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Attorneys for Plaintiffs and the Certified Subclasses

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

STACIA STINER, et al., on behalf of themselves
and all others similarly situated,

Plaintiffs,

vs.

BROOKDALE SENIOR LIVING, INC.;
BROOKDALE SENIOR LIVING
COMMUNITIES, INC.; et al.,

Defendants.

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

CLASS ACTION

**PLAINTIFFS' NOTICE OF ERRATA
REGARDING OF DECLARATION OF
GUY B. WALLACE IN SUPPORT OF
PLAINTIFFS' MOTION FOR
REASONABLE ATTORNEYS' FEES,
COSTS AND EXPENSES**

1 **TO THE COURT AND COUNSEL OF RECORD FOR ALL PARTIES:**

2 Plaintiffs respectfully submit this Notice of Errata to correct an error in the filing
3 of Declaration of Guy B. Wallace in Support of Plaintiffs' Motion for Reasonable
4 Attorneys' Fees, Costs and Expenses, Dkt. 1058.

5 Due to an administrative error while filing Exhibit A, was inadvertently not filed
6 with the declaration.

7 Plaintiffs respectfully request this document to be attached to the Declaration of
8 Guy B. Wallace in Support of Plaintiffs' Motion for Reasonable Attorneys' Fees, Costs
9 and Expenses, Dkt. 1058.

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13 Dated: August 8, 2025

/s/ Guy B. Wallace
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18 Attorneys for Plaintiffs and
19 the Certified Subclasses
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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing document with the Clerk of the Court for the United States District Court, Northern District of California, by using the Court's CM/ECF system on August 8, 2025.

I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the Court's CM/ECF system.

Dated: August 8, 2025

/s/ Guy B. Wallace
Guy B. Wallace

EXHIBIT A

Date	Initials	Hours	Rate	Amount Description	ProjectName
1/5/2017	Sarah Colby	0.1	\$950	\$95 emails with GBW/KK re potential staffing case	Case Organization, Planning and Strategy
1/9/2017	Sarah Colby	0.1	\$950	\$95 TC KK re potential case	Case Organization, Planning and Strategy
1/9/2017	Sarah Colby	0.1	\$950	\$95 Emails KK/GBW re potential case	Case Organization, Planning and Strategy
1/9/2017	Sarah Colby	0.2	\$950	\$190 CW GBW re potential legal theories and injunctive relief	Case Organization, Planning and Strategy
1/10/2017	Sarah Colby	1.9	\$950	\$1,805 Legal research on elder abuse and neglect cases interpreting 15610.07(b)	Case Organization, Planning and Strategy
1/11/2017	Sarah Colby	0.2	\$950	\$190 TC GBW re abstention/DSS issues	Case Organization, Planning and Strategy
1/17/2017	Sarah Colby	0.2	\$950	\$190 Emails from and to Tony at CANHR re potential expert; emails with GBW re potential staffing injunction/expert	Case Organization, Planning and Strategy
1/18/2017	Sarah Colby	0.3	\$950	\$285 Emails with JAU re ADAAG application to RCFEs; TC JAU re same	Case Organization, Planning and Strategy
1/18/2017	Sarah Colby	0.3	\$950	\$285 Review/edit JAU memo re ADAAG requirements for RCFEs/email JAU re same	Case Organization, Planning and Strategy
1/19/2017	Sarah Colby	0.7	\$950	\$665 TC Sharon Eidler re possible complaint against Brookdale	Pleadings and Motions Re: Pleadings
1/20/2017	Sarah Colby	0.2	\$950	\$190 CW Eidler re meeting with BSR residents; CW GBW/JAU re same	Case Organization, Planning and Strategy
1/20/2017	Sarah Colby	0.3	\$950	\$285 TC KK re possible case against Brookdale; emails with GBW/KAS re same	Case Organization, Planning and Strategy
1/20/2017	Sarah Colby	0.3	\$950	\$285 CW KK re Eidler/Brookdale case; review emails from Eidler; CW GBW re same	Case Organization, Planning and Strategy
1/31/2017	Guy Wallace	1.7	\$1,350	\$2,295 com's with KAS; KJK; SC re legal theory re access violations and understaffing at Brookdale	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/1/2017	Sarah Colby	0.1	\$950	\$95	emails with KK re records request and Brookdale contract	Pleadings and Motions Re: Pleadings
2/1/2017	Sarah Colby	0.2	\$950	\$190	Review Brookdale Resident Handbook	Pleadings and Motions Re: Pleadings
2/3/2017	Sarah Colby	0.3	\$950	\$285	cw gbw re meeting with the Eidlrs; tc GBW/JAU re drafting complaint	Case Organization, Planning and Strategy
2/3/2017	Sarah Colby	0.1	\$950	\$95	emails from and to class members re documents	Case Organization, Planning and Strategy
2/3/2017	Sarah Colby	0.1	\$950	\$95	MF Tim Kordes, LM Tim Kordes re mother's docs	Pleadings and Motions Re: Pleadings
2/3/2017	Sarah Colby	1.1	\$950	\$1,045	tc sharon eidler re current status, other residents, getting documentation, meeting	Pleadings and Motions Re: Pleadings
2/3/2017	Sarah Colby	1.2	\$950	\$1,140	Review docs from class members for drafting complaint	Pleadings and Motions Re: Pleadings
2/3/2017	Sarah Colby	0.2	\$950	\$190	research on Title III of the ADA and assistance	Pleadings and Motions Re: Pleadings
2/7/2017	Sarah Colby	0.1	\$950	\$95	emails with class members re docs for complaint	Pleadings and Motions Re: Pleadings
2/7/2017	Sarah Colby	0.2	\$950	\$190	review docs from residents and website info	Pleadings and Motions Re: Pleadings
2/8/2017	Guy Wallace	2.9	\$1,350	\$3,915	prepare for and attend meeting with Eidlrs, SC re conditions at Brookdale San Ramon, and preparation of pre-litigation letter and complaint	Case Organization, Planning and Strategy
2/8/2017	Sarah Colby	2.5	\$950	\$2,375	Meeting with Sharon Eidler and Chris Eidler re filing complaint/claims to assert	Case Organization, Planning and Strategy
2/8/2017	Sarah Colby	0.2	\$950	\$190	Review/edit PRA request re Brookdale San Ramon drafted by KK	Misc. Research
2/8/2017	Sarah Colby	0.4	\$950	\$380	Prep for meeting with clients (Eidlrs) re complaint; review docs for same	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/8/2017	Sarah Colby	1.0	\$950	\$950	Review client docs for drafting complaint	Pleadings and Motions Re: Pleadings
2/8/2017	Sarah Colby	0.3	\$950	\$285	CW GBW re notice letter and complaint	Pleadings and Motions Re: Pleadings
2/9/2017	Sarah Colby	0.3	\$950	\$285	CW GBW re retainer; emails with KK/KAS re same	Class Outreach and Contact
2/10/2017	Sarah Colby	0.6	\$950	\$570	TC client re meeting with ombuds and potential class reps;	Pleadings and Motions Re: Pleadings
2/10/2017	Sarah Colby	0.3	\$950	\$285	Research on issues of ombudsman confidentiality	Pleadings and Motions Re: Pleadings
2/10/2017	Sarah Colby	0.2	\$950	\$190	CW GBW re Sharon call re ombuds	Pleadings and Motions Re: Pleadings
2/13/2017	Sarah Colby	0.1	\$950	\$95	CW Sharon and Chris re concerns and Resident Council questions	Pleadings and Motions Re: Pleadings
2/14/2017	Sarah Colby	0.3	\$950	\$285	Emails with clients re questions re representation and cw GBW re same	Pleadings and Motions Re: Pleadings
2/16/2017	Guy Wallace	0.6	\$1,350	\$810	com's with client and SC re preparation of demand letter and complaint	Case Organization, Planning and Strategy
2/16/2017	Sarah Colby	0.5	\$950	\$475	TC Sharon and Chris re conv. with BOD and other potential class reps/letter to Brookdale	Case Organization, Planning and Strategy
2/16/2017	Sarah Colby	0.4	\$950	\$380	Draft letter requesting records to Brookdale; research code; email client re same	Case Organization, Planning and Strategy
2/17/2017	Guy Wallace	0.3	\$1,350	\$405	com's with clients and SC re potential retaliation by Defendant; client meetings	Case Organization, Planning and Strategy
2/17/2017	Sarah Colby	0.3	\$950	\$285	CW clients re meeting and filing complaint; cw GBW re same	Case Organization, Planning and Strategy
2/17/2017	Sarah Colby	0.1	\$950	\$95	LM Rita Stiner re meeting to discuss case	Case Organization, Planning and Strategy
2/17/2017	Sarah Colby	0.4	\$950	\$380	CW Chris/Sharon re agreement and meeting; CW GBW re same; MF Rita re meeting	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/17/2017	Sarah Colby	0.5	\$950	\$475	emails to and from KK re meetings with clients; TC resident's mother; email GBW re client meetings; email resident re meetings	Case Organization, Planning and Strategy
2/17/2017	Sarah Colby	0.2	\$950	\$190	Emails with resident; email with GBW re same; review notes	Class Outreach and Contact
2/21/2017	Guy Wallace	0.5	\$1,350	\$675	com's with clients re form of complaint	Case Organization, Planning and Strategy
2/22/2017	Guy Wallace	0.7	\$1,350	\$945	com's with clients; SC re demand letter, preparation of complaint	Case Organization, Planning and Strategy
2/27/2017	Guy Wallace	0.3	\$1,350	\$405	com's with SC re demand letter to Brookdale	Case Organization, Planning and Strategy
2/27/2017	Sarah Colby	5.2	\$950	\$4,940	draft CLRA/notice of violations letter to Brookdale, includes reviewing documents	Communications With Opposing Counsel
2/27/2017	Sarah Colby	1.9	\$950	\$1,805	Draft/edit demand letter to Brookdale	Communications With Opposing Counsel
2/28/2017	Guy Wallace	3.6	\$1,350	\$4,860	revise and edit pre-litigation letter to Brookdale; com's with SC and clients re same	Case Organization, Planning and Strategy
2/28/2017	Sarah Colby	1.6	\$950	\$1,520	Draft/edit demand letter to Brookdale	Communications With Opposing Counsel
2/28/2017	Sarah Colby	0.2	\$950	\$190	Research for demand letter to Brookdale	Communications With Opposing Counsel
2/28/2017	Sarah Colby	0.3	\$950	\$285	CW GBW re changes to demand letter	Communications With Opposing Counsel
3/1/2017	Guy Wallace	1.1	\$1,350	\$1,485	revise and edit demand and notice letter; com's with SC re same	Case Organization, Planning and Strategy
3/1/2017	Sarah Colby	0.2	\$950	\$190	Confirm meetings with clients and co-counsel	Case Organization, Planning and Strategy
3/1/2017	Sarah Colby	0.5	\$950	\$475	Review changes to letter to brookdale/additional edits, tc GBW re same (.1); forward letter to client	Communications With Opposing Counsel

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/1/2017	Sarah Colby	0.3	\$950	\$285	Research on Brookdale San Ramon ratings for drafting complaint	Pleadings and Motions Re: Pleadings
3/1/2017	Sarah Colby	0.2	\$950	\$190	CW family member witness re resident experience for drafting complaint	Pleadings and Motions Re: Pleadings
3/2/2017	Guy Wallace	6.5	\$1,350	\$8,775	travel to and from meeting with clients; meeting with same and analysis of clients' problems with Brookdale San Ramon and analysis of revisions of demand letter and approach to Complaint	Case Organization, Planning and Strategy
3/2/2017	Sarah Colby	0.5	\$950	\$475	Prepare for meeting with possible class reps	Case Organization, Planning and Strategy
3/2/2017	Sarah Colby	7.0	\$950	\$6,650	Meetings with Sharon and Pat Eidler; Paul Fracolli; and Stacia and Rita Stiner (includes travel to and from San Ramon)	Case Organization, Planning and Strategy
3/2/2017	Sarah Colby	0.4	\$950	\$380	Review client's comments to letter to Brookdale; edit letter	Communications With Opposing Counsel
3/3/2017	Guy Wallace	0.8	\$1,350	\$1,080	revise and edit demand letter; com's with SC re same and re issue of elder abuse claim	Case Organization, Planning and Strategy
3/3/2017	Sarah Colby	0.7	\$950	\$665	Review docs from class members	Class Outreach and Contact
3/3/2017	Sarah Colby	0.3	\$950	\$285	edits to letter to Brookdale; forward letter to client	Communications With Opposing Counsel
3/3/2017	Sarah Colby	0.4	\$950	\$380	CW GBW re correspondence to Brookdale and drafting of complaint	Pleadings and Motions Re: Pleadings
3/3/2017	Sarah Colby	0.9	\$950	\$855	TC Darryl Davis re his aunt's experience at Brookdale	Pleadings and Motions Re: Pleadings
3/5/2017	Sarah Colby	2.5	\$950	\$2,375	Legal research on issues of elder abuse (neglect) and ADA in longterm care; emails with GBW re same (.1)	Pleadings and Motions Re: Pleadings
3/6/2017	Sarah Colby	0.1	\$950	\$95	Email KK re contacting class members	Class Outreach and Contact
3/6/2017	Sarah Colby	1.2	\$950	\$1,140	legal research on elder abuse/understaffing issues	Pleadings and Motions Re: Pleadings
3/8/2017	Sarah Colby	0.1	\$950	\$95	Emails with KK re cw class members	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/9/2017	Guy Wallace	2.5	\$1,350	\$3,375	legal research and analysis re named plaintiff's duties to pay costs in event of losing outcome of case; com's with SC; Fishkin re same	Misc. Research
3/9/2017	Jennifer Bybee	0.2	\$925	\$185	Review research re plaintiffs responsible for costs; com's with GBW re same	Misc. Research
3/9/2017	Sarah Colby	0.1	\$950	\$95	cw gbw re class member calls and staffing incidents	Case Organization, Planning and Strategy
3/9/2017	Sarah Colby	1.7	\$950	\$1,615	LR re responsibility of Class reps for fees/costs	Class Certification
3/9/2017	Sarah Colby	0.2	\$950	\$190	TC and email GBW re issue of costs to prevailing party	Class Outreach and Contact
3/9/2017	Sarah Colby	0.8	\$950	\$760	legal research on issue of class rep responsibility for costs if loss	Class Outreach and Contact
3/9/2017	Sarah Colby	0.4	\$950	\$380	CW GBW re class member questions	Class Outreach and Contact
3/9/2017	Sarah Colby	0.1	\$950	\$95	CW GBW re class member questions	Class Outreach and Contact
3/9/2017	Sarah Colby	0.7	\$950	\$665	TC Tony at CANHR re cw ombudsman re staffing issues at Brookdale San Ramon; email from TC and ombudsman re same	Pleadings and Motions Re: Pleadings
3/10/2017	Sarah Colby	0.2	\$950	\$190	cw jau re understaffing issues	Case Organization, Planning and Strategy
3/16/2017	Sarah Colby	0.1	\$950	\$95	email from client re family council meeting and receipt of letter by Brookdale; email to EC re same	Communications With Opposing Counsel
3/21/2017	Sarah Colby	0.3	\$950	\$285	TC Carmen Becker; draft record request re Eva Becker	Case Organization, Planning and Strategy
3/21/2017	Sarah Colby	1.0	\$950	\$950	TC Sharon re situation in facility/class member outreach	Class Outreach and Contact
3/22/2017	Sarah Colby	0.7	\$950	\$665	TC Debbie Stinson re her experience at Brookdale SR	Class Outreach and Contact
4/3/2017	Sarah Colby	0.2	\$950	\$190	Emails re communication from Brookdale, tC GBW re same	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/4/2017	Sarah Colby	0.4	\$950	\$380	CW GBW re cw Brookdale counsel and call with co-co x 2; tc KAS re cw Brookdale counsel; emails re same	Case Organization, Planning and Strategy
4/4/2017	Sarah Colby	0.6	\$950	\$570	TC resident's granddaughter about fall; emails to and from co-co re communications with OC; emails with client re communications with OC	Case Organization, Planning and Strategy
4/5/2017	Guy Wallace	0.9	\$1,350	\$1,215	com's with Stebner; KJK; SC; Waters re potential relief and access requirements for assisted living facilities	Case Organization, Planning and Strategy
4/5/2017	Sarah Colby	0.5	\$950	\$475	TC KAS/KK/GBW re scope of relief seeking/meeting with Brookdale	Communications With Opposing Counsel
4/6/2017	Sarah Colby	1.0	\$950	\$950	TC Sharon re co from oc, recent developments at facility, prep for meeting with OC.	Case Organization, Planning and Strategy
4/6/2017	Sarah Colby	2.4	\$950	\$2,280	legal research on standards for RCFEs, case law re ALFs and Title III, research on administrator licensing	Case Organization, Planning and Strategy
4/10/2017	Jennifer Bybee	0.1	\$925	\$93	Leave message with Alan Evans re his mother's experience at Brookdale San Ramon	Class Outreach and Contact
4/11/2017	Sarah Colby	0.1	\$950	\$95	Email with KK re LR on fees and class rep	Class Outreach and Contact
4/11/2017	Sarah Colby	0.5	\$950	\$475	LR on class reps/responsibility for fees/costs; email KK re same	Class Outreach and Contact
4/12/2017	Sarah Colby	0.2	\$950	\$190	TC Prescott re resident's fall	Case Organization, Planning and Strategy
4/13/2017	Sarah Colby	0.7	\$950	\$665	TC Kelly Knapp re access theories and development on staffing claims	Case Organization, Planning and Strategy
4/13/2017	Sarah Colby	0.4	\$950	\$380	TC GBW re access theories x 2	Case Organization, Planning and Strategy
4/14/2017	Guy Wallace	1.2	\$1,350	\$1,620	com's with KAS; KJK; SC re systemic access challenge to California Brookdale facilities and theory and co-counsel re same	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount Description	ProjectName
4/14/2017	Sarah Colby	0.1	\$950	\$95 emails with potential witnesses	Case Organization, Planning and Strategy
4/14/2017	Sarah Colby	0.9	\$950	\$855 TC KK/KAS/GBW re access theories	Case Organization, Planning and Strategy
4/14/2017	Sarah Colby	0.5	\$950	\$475 TC KK re access theories	Case Organization, Planning and Strategy
4/14/2017	Sarah Colby	0.2	\$950	\$190 TC Kelly Knapp re meeting with Gay Grunfeld	Case Organization, Planning and Strategy
4/14/2017	Sarah Colby	0.2	\$950	\$190 vm from sharon; search for retainer; email to rita stiner with retainer	Case Organization, Planning and Strategy
4/14/2017	Sarah Colby	0.4	\$950	\$380 Review arbitration/injunction cases	Case Organization, Planning and Strategy
4/17/2017	Guy Wallace	2.6	\$1,350	\$3,510 legal research and analysis re readily achievable barrier removal duties and application to ALFs and SNFs	Misc. Research
4/17/2017	Sarah Colby	0.7	\$950	\$665 Research on standards for LTCF	Case Organization, Planning and Strategy
4/17/2017	Sarah Colby	0.2	\$950	\$190 TC GBW re ALFs and 2010 standards	Case Organization, Planning and Strategy
4/17/2017	Sarah Colby	1.7	\$950	\$1,615 research on application of title III to ALFs and Brookdale renovations	Case Organization, Planning and Strategy
4/18/2017	Guy Wallace	1.9	\$1,350	\$2,565 legal research and analysis re "long term care facility" coverage; readily achievable barrier removal duty; com's with SC and Steinfeld re same	Misc. Research
4/18/2017	Guy Wallace	1.8	\$1,350	\$2,430 legal research and analysis re 2010 ADA Standards and application to long term care facilities; com's with SC re same (.4)	Misc. Research
4/18/2017	Jennifer Bybee	0.8	\$925	\$740 Review arbitration agreements; draft email to GBW and SSC re arbitration agreements; com's with GBW re same; com's with SSC re case	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/18/2017	Sarah Colby	1.4	\$950	\$1,330	Research on "long-term care facility" issue; tc GBW re same (.2)	Case Organization, Planning and Strategy
4/18/2017	Sarah Colby	0.2	\$950	\$190	TC GBW re damages theory	Case Organization, Planning and Strategy
4/18/2017	Sarah Colby	0.2	\$950	\$190	emails from and to client re call and recent FC BOD meeting with ED	Case Organization, Planning and Strategy
4/18/2017	Sarah Colby	1.0	\$950	\$950	Review of 2010 Title III regs and CBC 11B	Case Organization, Planning and Strategy
4/18/2017	Sarah Colby	0.3	\$950	\$285	CW GBW re Title III, CBC and regs	Case Organization, Planning and Strategy
4/19/2017	Guy Wallace	4.4	\$1,350	\$5,940	prepare for and attend meeting at RBGG with Grundeld, Hu, Stebner, KJK, SC re Brookdale and putative statewide challenge re same	Case Organization, Planning and Strategy
4/19/2017	Sarah Colby	1.0	\$950	\$950	TC Sharon re developments at Brookdale/meeting with Acting ED	Case Organization, Planning and Strategy
4/19/2017	Sarah Colby	1.4	\$950	\$1,330	Review/read 2010 ADA Standards and 2010 Title 3 regs	Case Organization, Planning and Strategy
4/19/2017	Sarah Colby	1.1	\$950	\$1,045	Meeting with GBW in prep for meeting with Brookdale Gen Counsel	Case Organization, Planning and Strategy
4/19/2017	Sarah Colby	2.0	\$950	\$1,900	Meeting with Gay Grunfeld/KAS/GBW/KK/Chris re possible CA class case and legal theories	Case Organization, Planning and Strategy
4/19/2017	Sarah Colby	0.3	\$950	\$285	Meeting with KAS/KK/GBW post Rosen Bien meeting re contacting client and possible legal theories on statewide basis	Case Organization, Planning and Strategy
4/19/2017	Sarah Colby	0.1	\$950	\$95	emails with KK/GBW re potential legal theories	Case Organization, Planning and Strategy
4/20/2017	Guy Wallace	0.9	\$1,350	\$1,215	com's with SE; SC re putative statewide challenge	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/20/2017	Guy Wallace	1.6	\$1,350	\$2,160	analysis of potential statewide claims and approach to class certification, potential problems re CLRA damages claims pursued on a classwide basis	Case Organization, Planning and Strategy
4/20/2017	Jennifer Bybee	0.3	\$925	\$278	Com's with GBW and SSC re meeting with Rosen Bien and potential case against Brookdale	Class Outreach and Contact
4/20/2017	Sarah Colby	0.8	\$950	\$760	TC CoCo County Ombudspersons re conditions at Brookdale SR	Case Organization, Planning and Strategy
4/20/2017	Sarah Colby	0.6	\$950	\$570	TC Kelly re ombudsman info and legal theories	Case Organization, Planning and Strategy
4/20/2017	Sarah Colby	0.6	\$950	\$570	TC Sharon and GBW re recent developments at facility and Brookdale Sonoma issues	Case Organization, Planning and Strategy
4/20/2017	Sarah Colby	0.8	\$950	\$760	CW GBW x 4 re legal theories, claims, damages	Case Organization, Planning and Strategy
4/20/2017	Sarah Colby	0.2	\$950	\$190	emails from and to GBW and KK re class/damages/injunctive relief theories	Case Organization, Planning and Strategy
4/20/2017	Sarah Colby	0.2	\$950	\$190	TC GBW re conv with ombudsmen	Case Organization, Planning and Strategy
4/21/2017	Jennifer Bybee	0.4	\$925	\$370	Draft email to GBW and SSC re conversation with class member A. Evans	Class Outreach and Contact
4/21/2017	Jennifer Bybee	0.7	\$925	\$648	Phone call with class member's son (Alan Evans) re mother's experience at Brookdale San Ramon	Class Outreach and Contact
4/21/2017	Sarah Colby	0.4	\$950	\$380	TC JAU re developments at Brookdale and with potential co-counsel and re expert on staffing	Case Organization, Planning and Strategy
4/21/2017	Sarah Colby	0.1	\$950	\$95	Emails JAU/GBW re CW class members	Case Organization, Planning and Strategy
4/21/2017	Sarah Colby	1.4	\$950	\$1,330	Review ADA in facilities/ADA staffing opinions	Pleadings and Motions Re: Pleadings
4/22/2017	Sarah Colby	0.1	\$950	\$95	email from KK re developing experts	Experts (Including Retention)
4/24/2017	Guy Wallace	0.4	\$1,350	\$540	tc with Grunfeld; SC re preparation of complaint and legal theories	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/24/2017	Jennifer Bybee	2.0	\$925	\$1,850	Research re reasonable modifications in long term care facilities; research regulations and DOJ guidance re same; com's with SSC and GBW re same	Misc. Research
4/24/2017	Sarah Colby	0.1	\$950	\$95	TC JAU re research on RMIP in care context; email case law to JAU	Case Organization, Planning and Strategy
4/24/2017	Sarah Colby	0.2	\$950	\$190	CW other attorneys re issue of class reps being responsible for costs.	Case Organization, Planning and Strategy
4/24/2017	Sarah Colby	0.2	\$950	\$190	TC Gay Grunfeld/GBW re class members and legal theories	Case Organization, Planning and Strategy
4/24/2017	Sarah Colby	0.6	\$950	\$570	CW GBW re legal theories/class members/meeting with OC on Wed.	Case Organization, Planning and Strategy
4/24/2017	Sarah Colby	1.2	\$950	\$1,140	Research on taxable costs	Case Organization, Planning and Strategy
4/24/2017	Sarah Colby	0.2	\$950	\$190	TC Fishkin re cost issue	Case Organization, Planning and Strategy
4/24/2017	Sarah Colby	0.3	\$950	\$285	CW GBW re legal research on costs issue	Case Organization, Planning and Strategy
4/24/2017	Sarah Colby	0.4	\$950	\$380	Research on Title 22 regs re access features; TC Knapp re those issues in San Pablo facility (.1)	Case Organization, Planning and Strategy
4/24/2017	Sarah Colby	0.4	\$950	\$380	Additional Title 22 research	Case Organization, Planning and Strategy
4/24/2017	Sarah Colby	0.2	\$950	\$190	TC GBW re title 22 regs and San Pablo resident	Case Organization, Planning and Strategy
4/24/2017	Sarah Colby	0.1	\$950	\$95	Emails with Sharon re discussions with witnesses	Case Organization, Planning and Strategy
4/24/2017	Sarah Colby	0.1	\$950	\$95	emails w/ client re client docs and download docs	Case Organization, Planning and Strategy
4/24/2017	Sarah Colby	0.1	\$950	\$95	TC Knapp re meeting client at San Pablo	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/24/2017	Sarah Colby	0.6	\$950	\$570	TC Kelly Knapp re possible experts	Experts (Including Retention)
4/24/2017	Sarah Colby	0.1	\$950	\$95	TC no. 2 with Kelly re experts	Experts (Including Retention)
4/25/2017	Sarah Colby	0.1	\$950	\$95	TC GBW re SNF standards; class outreach	Case Organization, Planning and Strategy
4/26/2017	Guy Wallace	0.5	\$1,350	\$675	legal research and analysis re potential reasonable modification in policy and practice re staffing	Misc. Research
4/26/2017	Guy Wallace	4.8	\$1,350	\$6,480	prepare for and attend meeting with Cesar; KAS; SC re mediation; analysis of results thereof	Settlement
4/26/2017	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re reasonable modification research	Misc. Research
4/26/2017	Jennifer Bybee	0.4	\$925	\$370	Research reasonable modifications granted in context of nursing homes or nursing facilities	Misc. Research
4/26/2017	Sarah Colby	1.6	\$950	\$1,520	TC Sharon re recent developments and upcoming meeting with Brookdale	Case Organization, Planning and Strategy
4/26/2017	Sarah Colby	0.5	\$950	\$475	Meeting with GBW to prep for meeting with Brookdale counsel	Case Organization, Planning and Strategy
4/26/2017	Sarah Colby	0.6	\$950	\$570	Meeting with GBW/KAS to prepare for meeting with Brookdale counsel	Case Organization, Planning and Strategy
4/26/2017	Sarah Colby	1.6	\$950	\$1,520	Meeting with Tim Cesar (KAS/GBW also present)	Case Organization, Planning and Strategy
4/26/2017	Sarah Colby	0.3	\$950	\$285	Meeting with KAS/GBW post-meeting with Brookdale counsel to prioritize next steps	Case Organization, Planning and Strategy
4/26/2017	Sarah Colby	0.3	\$950	\$285	Meeting with GBW to discuss next steps/drafting complaint/expert work	Case Organization, Planning and Strategy
4/26/2017	Sarah Colby	0.2	\$950	\$190	emails from and to client re dining and fees issues	Case Organization, Planning and Strategy
4/26/2017	Sarah Colby	0.2	\$950	\$190	CW GBW re staffing models	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/27/2017	Guy Wallace	3.3	\$1,350	\$4,455	analysis of potential understaffing claim and facts and legal theory re same; com's with SC; JAU re same (.5)	Pleadings and Motions Re: Pleadings
4/27/2017	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re facts on staffing claim; review notes on client interviews re same	Discovery (Non-Deposition)
4/27/2017	Sarah Colby	0.6	\$950	\$570	Research re staffing in ALFs	Case Organization, Planning and Strategy
4/27/2017	Sarah Colby	0.5	\$950	\$475	TC Sharon re meeting yesterday with Tim Cesar	Case Organization, Planning and Strategy
4/27/2017	Sarah Colby	0.4	\$950	\$380	TC Sharon x 2 re meeting with Brookdale counsel and complaint drafting	Case Organization, Planning and Strategy
4/27/2017	Sarah Colby	0.1	\$950	\$95	emails with client and GBW re communication with brookdale management	Case Organization, Planning and Strategy
4/27/2017	Sarah Colby	0.1	\$950	\$95	LM Debbie Stinson; email Kelly re resident in other facility re surcharge	Class Outreach and Contact
4/27/2017	Sarah Colby	1.0	\$950	\$950	CW Kelly re investigation for drafting complaint	Pleadings and Motions Re: Pleadings
4/27/2017	Sarah Colby	0.5	\$950	\$475	research on reasonable modification issues	Pleadings and Motions Re: Pleadings
4/27/2017	Sarah Colby	0.2	\$950	\$190	TC GBW re modification issue for complaint	Pleadings and Motions Re: Pleadings
4/27/2017	Sarah Colby	3.8	\$950	\$3,610	Research on staffing models and reasonable modifications for complaint	Pleadings and Motions Re: Pleadings
4/28/2017	Jennifer Bybee	1.3	\$925	\$1,203	Review Winans and Carnes complaints for staffing allegations applicable to this case; com's with GBW re same	Case Organization, Planning and Strategy
4/28/2017	Sarah Colby	0.2	\$950	\$190	emails with KK and GBW re staffing models/experts/complaint	Case Organization, Planning and Strategy
4/28/2017	Sarah Colby	0.1	\$950	\$95	TC Sharon re other class members; dining changes	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/28/2017	Sarah Colby	0.1	\$950	\$95	emails with potential expert re staffing	Case Organization, Planning and Strategy
4/28/2017	Sarah Colby	0.1	\$950	\$95	Email to disability rights attorneys re staffing experts	Case Organization, Planning and Strategy
4/28/2017	Sarah Colby	0.3	\$950	\$285	TC KK re Hager call; email memo to KK and GBW re same	Class Outreach and Contact
4/28/2017	Sarah Colby	0.3	\$950	\$285	TC Knapp re division of labor re staffing experts and drafting complaint	Pleadings and Motions Re: Pleadings
4/28/2017	Sarah Colby	3.3	\$950	\$3,135	Review expert articles on Quality of Care measures/staffing/other states' approaches for complaint drafting	Pleadings and Motions Re: Pleadings
4/28/2017	Sarah Colby	0.2	\$950	\$190	TC GBW re ADA claims	Pleadings and Motions Re: Pleadings
4/30/2017	Sarah Colby	0.6	\$950	\$570	research/articles re QoC and staffing measurements in CA and other states	Pleadings and Motions Re: Pleadings
5/1/2017	Guy Wallace	1.4	\$1,350	\$1,890	prepare for and participate in tc with Grunfeld, Hu, KAS, KJK, SC re potential state class action against Brookdale; analysis of results of same	Case Organization, Planning and Strategy
5/1/2017	Jennifer Bybee	2.6	\$925	\$2,405	Research what reasonable accommodations have been granted in nursing home context; notes re same	Misc. Research
5/1/2017	Sarah Colby	0.9	\$950	\$855	TC Gay from RBGG/KAS/KK/GBW/CH re various Brookdale facilities	Case Organization, Planning and Strategy
5/1/2017	Sarah Colby	0.2	\$950	\$190	Emails with photos re WC users on trips from client; forward to GBW/KK/JAU; emails to client; tc GBW re same	Pleadings and Motions Re: Pleadings
5/1/2017	Sarah Colby	0.1	\$950	\$95	Emails with potential expert to set up call; tc KK re same	Pleadings and Motions Re: Pleadings
5/1/2017	Sarah Colby	0.4	\$950	\$380	TC KAS/GBW/KK re drafting complaint	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/2/2017	Guy Wallace	1.5	\$1,350	\$2,025	review and analysis of release from Emeritus case; com's with GCG; KAS; SC re claims	Case Management Conferences
5/2/2017	Sarah Colby	0.1	\$950	\$95	emails with coco re scope of Winans release	Case Organization, Planning and Strategy
5/4/2017	Sarah Colby	0.6	\$950	\$570	TC KK re expert development and staffing model issues	Case Organization, Planning and Strategy
5/4/2017	Sarah Colby	0.4	\$950	\$380	Research on staffing data	Case Organization, Planning and Strategy
5/4/2017	Sarah Colby	0.2	\$950	\$190	VM x 2 from Cookie White re Brookdale Rancho Mirage problems; TC KK re same	Case Organization, Planning and Strategy
5/4/2017	Sarah Colby	0.1	\$950	\$95	Emails from and to KK re potential class member; tc KK re potential class member	Case Organization, Planning and Strategy
5/4/2017	Sarah Colby	0.1	\$950	\$95	Emails from and to client re developments at BSR	Case Organization, Planning and Strategy
5/4/2017	Sarah Colby	0.8	\$950	\$760	TC potential expert and KK re staffing models	Pleadings and Motions Re: Pleadings
5/5/2017	Sarah Colby	0.7	\$950	\$665	TC Dr. Carla Perisinotto re staffing at RCFEs	Case Organization, Planning and Strategy
5/5/2017	Sarah Colby	0.3	\$950	\$285	TC KK re expert on staffing issues	Case Organization, Planning and Strategy
5/5/2017	Sarah Colby	2.4	\$950	\$2,280	Research regarding staffing models/measurements/outcomes in assisted living or comparable facilities	Case Organization, Planning and Strategy
5/5/2017	Sarah Colby	0.4	\$950	\$380	Review requirements for demand letters and complaints on construction access cases under CA law	Case Organization, Planning and Strategy
5/5/2017	Sarah Colby	0.1	\$950	\$95	emails with Dr. Perissinotto and KK	Experts (Including Retention)
5/9/2017	Sarah Colby	0.6	\$950	\$570	TC FRancis White/witness re Brookdale Rancho Mirage (.5); CW GBW re same	Case Organization, Planning and Strategy
5/9/2017	Sarah Colby	0.1	\$950	\$95	Email from Tony re potential class member	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/9/2017	Sarah Colby	0.1	\$950	\$95	email Tim Cesar re BSR billing for Patricia Eidler	Communications With Opposing Counsel
5/9/2017	Sarah Colby	0.6	\$950	\$570	Review professional articles re staffing and AL	Experts (Including Retention)
5/9/2017	Sarah Colby	0.1	\$950	\$95	CW GBW re CW potential expert	Experts (Including Retention)
5/10/2017	Guy Wallace	0.6	\$1,350	\$810	com's with GG and KAS; SC re preparation of complaint	Pleadings and Motions Re: Pleadings
5/10/2017	Sarah Colby	0.1	\$950	\$95	Email from Sharon re Pat moving rooms/email GBW re same	Case Organization, Planning and Strategy
5/11/2017	Sarah Colby	0.3	\$950	\$285	CW GBW re Patricia Eidler's potential room move/possible new class rep/and sending co to oc	Case Organization, Planning and Strategy
5/11/2017	Sarah Colby	0.2	\$950	\$190	Review articles about Brookdale's finances/potential purchase	Case Organization, Planning and Strategy
5/11/2017	Sarah Colby	0.1	\$950	\$95	CW GBW re potential expert	Experts (Including Retention)
5/12/2017	Jennifer Bybee	2.5	\$925	\$2,313	Research re reasonable modifications in policy in nursing homes; notes re same	Misc. Research
5/15/2017	Jennifer Bybee	1.7	\$925	\$1,573	Research re reasonable modifications granted in nursing home context.	Misc. Research
5/15/2017	Sarah Colby	0.7	\$950	\$665	Draft memo re TC with Brookdale Hemet ex-resident	Case Organization, Planning and Strategy
5/15/2017	Sarah Colby	0.2	\$950	\$190	CW GBW re potential class rep from Hemet facility	Class Outreach and Contact
5/15/2017	Sarah Colby	0.4	\$950	\$380	Draft email to Tim Cesar re Patricia Eidler's room, includes review of documents and correspondence.	Communications With Opposing Counsel
5/15/2017	Sarah Colby	0.1	\$950	\$95	TC Kelly re meeting with expert; email to coco and Flores re meeting	Experts (Including Retention)
5/16/2017	Jennifer Bybee	0.4	\$925	\$370	Research reasonable modifications granted in assisted living context	Misc. Research
5/16/2017	Sarah Colby	0.8	\$950	\$760	Review memos and emails from RBGG re meetings with class members/cw ombuds/review of CCL records	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/16/2017	Sarah Colby	0.1	\$950	\$95	CW KK re preparation for meeting on Thursday	Case Organization, Planning and Strategy
5/17/2017	Jennifer Bybee	2.6	\$925	\$2,405	Research what reasonable modifications in policy have been ordered in assisted living	Misc. Research
5/17/2017	Jennifer Bybee	0.9	\$925	\$833	Research re what reasonable modifications have been ordered in skilled nursing context	Misc. Research
5/17/2017	Jennifer Bybee	0.6	\$925	\$555	Research what reasonable modifications have been ordered in hospital context	Misc. Research
5/17/2017	Sarah Colby	0.1	\$950	\$95	MF Sharon re Patricia's BSR/move; email co-co re same	Case Organization, Planning and Strategy
5/17/2017	Sarah Colby	0.4	\$950	\$380	TC KK re preparation for meeting/informal discovery measures/information from class members	Case Organization, Planning and Strategy
5/17/2017	Sarah Colby	0.9	\$950	\$855	TC Sharon re developments on our side and at BSR	Case Organization, Planning and Strategy
5/17/2017	Sarah Colby	0.1	\$950	\$95	CW GBW re planning for meeting tomorrow with RRBG and CW Sharon	Case Organization, Planning and Strategy
5/17/2017	Sarah Colby	0.3	\$950	\$285	TC Carmen Becker re mom's records and condition/Paso Robles facility	Case Organization, Planning and Strategy
5/17/2017	Sarah Colby	1.9	\$950	\$1,805	review and organize notes from client meetings and calls with witnesses in preparation for meeting with co-counsel	Case Organization, Planning and Strategy
5/17/2017	Sarah Colby	0.2	\$950	\$190	CW KK re visiting class member and recent developments	Case Organization, Planning and Strategy
5/17/2017	Sarah Colby	0.2	\$950	\$190	CW GBW re class reps and meeting with co-counsel	Case Organization, Planning and Strategy
5/17/2017	Sarah Colby	0.4	\$950	\$380	Review new contract for Patricia Eidler's move; emails with Sharon, Chris and GBW re same	Case Organization, Planning and Strategy
5/17/2017	Sarah Colby	0.1	\$950	\$95	TC Hager; email Sharon re setting up meeting with Hager	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/18/2017	Guy Wallace	2.6	\$1,350	\$3,510	prepare for and attend conf with co-counsel re fact investigation; legal theories; preparation of further demand letter and draft of complaint	Case Organization, Planning and Strategy
5/18/2017	Jennifer Bybee	1.5	\$925	\$1,388	Research what types of reasonable modifications have been granted in hospitals	Misc. Research
5/18/2017	Sarah Colby	0.5	\$950	\$475	Review and edit memos from KK re calls with consultants and ombudsman; email same to co-co	Case Organization, Planning and Strategy
5/18/2017	Sarah Colby	0.2	\$950	\$190	Email from client/notes from FC meeting; send to co-co	Case Organization, Planning and Strategy
5/18/2017	Sarah Colby	1.7	\$950	\$1,615	REview memos, notes and client docs in preparation for meeting with RBGG	Case Organization, Planning and Strategy
5/18/2017	Sarah Colby	0.9	\$950	\$855	Review new agreement from Brookdale, CW GBW re same, email Sharon and Chris re same, TC Sharon and Chris re same (.6)	Case Organization, Planning and Strategy
5/18/2017	Sarah Colby	0.1	\$950	\$95	email from GG re potential experts	Experts (Including Retention)
5/18/2017	Sarah Colby	3.8	\$950	\$3,610	Meeting with RBGG (Gay, Chris, Ben), KK, GBW re investigations/legal claims/demand letter/complaint-- includes travel to and from SF (1.1)	Pleadings and Motions Re: Pleadings
5/19/2017	Sarah Colby	0.1	\$950	\$95	TC GBW re CW Eidlrs/Brookdale agreement	Case Organization, Planning and Strategy
5/22/2017	Guy Wallace	0.6	\$1,350	\$810	com's with SC; JAU re preparation of complaint; demand letter; ADA legal theory	Pleadings and Motions Re: Pleadings
5/22/2017	Jennifer Bybee	0.7	\$925	\$648	Com's with GBW and SSC re drafting complaint, next steps, case history	Case Organization, Planning and Strategy
5/22/2017	Jennifer Bybee	2.7	\$925	\$2,498	Review all emails and memos from Brookdale case in prep for meeting today; fact research on Brookdale Sonoma facilities	Misc. Research

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/22/2017	Sarah Colby	0.2	\$950	\$190	Emails with coco re assignments/memos from interviews/forwarded emails from RBGG clients, emails with Sharon and Chris re OC communications and agreement with MG/Brookdale	Case Organization, Planning and Strategy
5/22/2017	Sarah Colby	0.5	\$950	\$475	Review files and email Eidl原因 re residency agreement	Case Organization, Planning and Strategy
5/22/2017	Sarah Colby	0.6	\$950	\$570	Review Eidler docs to draft demand letter	Communications With Opposing Counsel
5/22/2017	Sarah Colby	1.0	\$950	\$950	Drafting CLRA/55.31 letter to Brookdale	Communications With Opposing Counsel
5/22/2017	Sarah Colby	0.2	\$950	\$190	Review docs from Sharon in prep for drafting demand letter	Pleadings and Motions Re: Pleadings
5/22/2017	Sarah Colby	0.5	\$950	\$475	CW JAU/GBW re drafting demand letter, complaint and PRA requests	Pleadings and Motions Re: Pleadings
5/23/2017	Sarah Colby	0.3	\$950	\$285	TC Cookie White re Brookdale settlement agreement; CW GBW re same	Class Outreach and Contact
5/23/2017	Sarah Colby	0.1	\$950	\$95	Email from and to Mike West re BSR for Patricia Eidler and scheduling a phone call	Communications With Opposing Counsel
5/23/2017	Sarah Colby	4.1	\$950	\$3,895	Draft 1780 and 55.31 letter to Brookdale re all CA facilities; includes reviewing notes and documents	Communications With Opposing Counsel
5/24/2017	Guy Wallace	0.8	\$1,350	\$1,080	revise and edit CA-wide demand letter; com's with SC re same (.4)	Settlement
5/24/2017	Sarah Colby	0.2	\$950	\$190	CW Sharon Eidler/KK re cw OC	Case Organization, Planning and Strategy
5/24/2017	Sarah Colby	0.2	\$950	\$190	Email from Chris Eidler re contract and current rates; review contract from Chris/Brookdale	Case Organization, Planning and Strategy
5/24/2017	Sarah Colby	2.1	\$950	\$1,995	Meeting with Bonita Hager (includes travel to and from San Ramon)	Class Outreach and Contact
5/24/2017	Sarah Colby	0.2	\$950	\$190	CW KK re potential class representatives	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount Description	ProjectName
5/24/2017	Sarah Colby	0.6	\$950	\$570 TC Mike West re Patricia Eidler BSR x 2	Communications With Opposing Counsel
5/24/2017	Sarah Colby	0.2	\$950	\$190 REview documents for information to communicate to OC re Patricia Eidler BSR	Communications With Opposing Counsel
5/24/2017	Sarah Colby	0.2	\$950	\$190 TC Sharon re BSR issue and contract with Brookdale	Communications With Opposing Counsel
5/24/2017	Sarah Colby	1.1	\$950	\$1,045 DRafting Letter to Brookdale, includes LR on emergency evacuation	Communications With Opposing Counsel
5/24/2017	Sarah Colby	1.2	\$950	\$1,140 Draft/edit co to Brookdale	Communications With Opposing Counsel
5/24/2017	Sarah Colby	0.3	\$950	\$285 CW GBW re changes to letter to Brookdale	Communications With Opposing Counsel
5/24/2017	Sarah Colby	0.2	\$950	\$190 Additional edits to letter to Brookdale	Communications With Opposing Counsel
5/25/2017	Sarah Colby	0.1	\$950	\$95 Email to Sharon and Chris re Brookdale offer on BSR	Case Organization, Planning and Strategy
5/25/2017	Sarah Colby	0.1	\$950	\$95 Emails with KK and Tony at CANHR re Orange County facility	Class Outreach and Contact
5/25/2017	Sarah Colby	0.1	\$950	\$95 Emails from and to Hemet facility family member	Class Outreach and Contact
5/25/2017	Sarah Colby	0.1	\$950	\$95 TC Cookie White re communications with Brookdale	Communications With Opposing Counsel
5/25/2017	Sarah Colby	0.2	\$950	\$190 Review KK changes to CO to Brookdale; review website re dining; email to co-co re same	Communications With Opposing Counsel
5/25/2017	Sarah Colby	0.1	\$950	\$95 Emails with co-co re Brookdale letter and call system update	Communications With Opposing Counsel
5/26/2017	Sarah Colby	0.5	\$950	\$475 TC Chris and Sharon re Brookdale offer re BSR/class ramifications	Case Organization, Planning and Strategy
5/26/2017	Sarah Colby	0.2	\$950	\$190 Review KK memo on Elder Abuse claim; emails with co-co re same	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/30/2017	Sarah Colby	1.0	\$950	\$950	Draft email memo re BSR/PSR issue for co-co; review docs re same	Case Organization, Planning and Strategy
5/30/2017	Sarah Colby	0.1	\$950	\$95	Review forwarded emails from Loresia with Brookdale Hemet	Class Outreach and Contact
5/30/2017	Sarah Colby	0.1	\$950	\$95	email gbw re offer from Brookdale	Communications With Opposing Counsel
5/30/2017	Sarah Colby	1.0	\$950	\$950	Edit letter to Brookdale (includes additional research on facility complaints and marketing); tc GBW re same	Communications With Opposing Counsel
5/30/2017	Sarah Colby	0.2	\$950	\$190	TC GBW re Brookdale offer re BSR	Communications With Opposing Counsel
5/31/2017	Jennifer Bybee	0.2	\$925	\$185	Review email com's from SSC and C. Wu re residency agreement and staffing issues	Communications With Opposing Counsel
5/31/2017	Jennifer Bybee	1.9	\$925	\$1,758	Research what reasonable accommodations have been granted in hospital context; notes re same	Misc. Research
5/31/2017	Sarah Colby	0.1	\$950	\$95	CW GBW re cw potential class rep from Hemet facility	Class Outreach and Contact
5/31/2017	Sarah Colby	0.4	\$950	\$380	TC Loresia Vallette re Brookdale Hemet;	Class Outreach and Contact
5/31/2017	Sarah Colby	0.2	\$950	\$190	Revise record request for Hemet facility; email Loresia re same	Class Outreach and Contact
5/31/2017	Sarah Colby	0.3	\$950	\$285	Review Eva Becker file	Class Outreach and Contact
6/1/2017	Guy Wallace	1.1	\$1,350	\$1,485	revise and edit demand letter	Settlement
6/1/2017	Sarah Colby	0.1	\$950	\$95	MF/LM Cookie White re discussion with OC	Class Outreach and Contact
6/2/2017	Jennifer Bybee	0.7	\$925	\$648	Research what reasonable modifications have been granted in hospital context; notes on same	Misc. Research
6/4/2017	Sarah Colby	0.1	\$950	\$95	Emails with co-counsel re setting up call	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/5/2017	Jennifer Bybee	3.9	\$925	\$3,608	Research what reasonable accommodations have been ordered in hospital context; research what reasonable accommodations have been ordered in prison context	Misc. Research
6/5/2017	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW and SSC re complaint and theory re reasonable accommodation	Pleadings and Motions Re: Pleadings
6/5/2017	Sarah Colby	0.1	\$950	\$95	Review JCE memo re injunctive relief/arbitration	Case Organization, Planning and Strategy
6/5/2017	Sarah Colby	0.1	\$950	\$95	TC Cookie White/GBW re discussions with OC	Case Organization, Planning and Strategy
6/5/2017	Sarah Colby	0.1	\$950	\$95	Emails from and to Tony re possible witnesses/class members	Class Outreach and Contact
6/5/2017	Sarah Colby	0.1	\$950	\$95	CW GBW re meeting with client; email client re same	Class Outreach and Contact
6/5/2017	Sarah Colby	0.2	\$950	\$190	cw GBW re drafting ADA section of complaint	Pleadings and Motions Re: Pleadings
6/5/2017	Sarah Colby	0.8	\$950	\$760	CW GBW re allegations for ADA claims in complaint	Pleadings and Motions Re: Pleadings
6/5/2017	Sarah Colby	0.2	\$950	\$190	CW GBW/JAU re allegations for ADA portion of complaint	Pleadings and Motions Re: Pleadings
6/6/2017	Guy Wallace	1.4	\$1,350	\$1,890	tc with GCG; Hu; KAS; SC re claims to be included in complaint and follow up com's with SC re ADA claim	Pleadings and Motions Re: Pleadings
6/6/2017	Jennifer Bybee	0.1	\$925	\$93	Email coms from SSC to co-counsel re various Brookdale agreements and arbitration clauses	Case Organization, Planning and Strategy
6/6/2017	Jennifer Bybee	2.4	\$925	\$2,220	Research what reasonable modifications have been granted in prison context; notes re same	Misc. Research
6/6/2017	Sarah Colby	0.5	\$950	\$475	TC Gay/Chris/Kathryn/George/GBW re demand letter/Eidler offer/CLRA and ADA claims	Case Organization, Planning and Strategy
6/6/2017	Sarah Colby	0.1	\$950	\$95	CW GBW re CLRA claim/Brookdale agreement	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/6/2017	Sarah Colby	0.5	\$950	\$475	Review MG and Brookdale Residency Agreements for several clients; email co-counsel re same	Case Organization, Planning and Strategy
6/6/2017	Sarah Colby	1.2	\$950	\$1,140	TC employee witness re Conditions at Brookdale Danville	Case Organization, Planning and Strategy
6/6/2017	Sarah Colby	1.1	\$950	\$1,045	Review docs from Eva Becker file	Case Organization, Planning and Strategy
6/6/2017	Sarah Colby	0.2	\$950	\$190	CW GBW and CW SG re letter to CCDA	Case Organization, Planning and Strategy
6/6/2017	Sarah Colby	0.1	\$950	\$95	LM for Claudia Coke; LM for Marilyn Tilton; reviewed emails about Marilyn from Tony at CANHR	Class Outreach and Contact
6/6/2017	Sarah Colby	0.1	\$950	\$95	Email to KK re meeting with Bonita Hager	Class Outreach and Contact
6/6/2017	Sarah Colby	0.2	\$950	\$190	Review notes for drafting complaint	Pleadings and Motions Re: Pleadings
6/7/2017	Guy Wallace	0.8	\$1,350	\$1,080	analysis of ADA claim for RMIP and com's with SC re same	Pleadings and Motions Re: Pleadings
6/7/2017	Jennifer Bybee	0.1	\$925	\$93	Com's with SSC re phone call to class member for complaint	Class Outreach and Contact
6/7/2017	Jennifer Bybee	0.2	\$925	\$185	Review email from C. Chicotel re Marilyn Tilton; review voicemail from SSC from M. Tilton; phone call to M. Tilton, will call me back at better time	Class Outreach and Contact
6/7/2017	Jennifer Bybee	0.7	\$925	\$648	Phone call with M. Tilton re Brookdale Brookhurst until connection lost; attempts at calling M. Tilton back; email to M. Tilton re same	Class Outreach and Contact
6/7/2017	Jennifer Bybee	2.2	\$925	\$2,035	Research what reasonable modifications have been ordered in prison context; notes on same	Misc. Research
6/7/2017	Jennifer Bybee	2.1	\$925	\$1,943	Research re what reasonable modifications have been ordered in the transportation context; notes re same	Misc. Research
6/7/2017	Sarah Colby	0.5	\$950	\$475	TC Sharon re offer/cw co-co and status of complaint	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/7/2017	Sarah Colby	0.2	\$950	\$190	TC JAU re class member at Brookhurst facility. Forwarded emails re same	Class Outreach and Contact
6/7/2017	Sarah Colby	0.1	\$950	\$95	Emails with KK/GBW re visitingBonita Hager	Class Outreach and Contact
6/7/2017	Sarah Colby	0.1	\$950	\$95	CW GBW re class member outreach	Class Outreach and Contact
6/7/2017	Sarah Colby	0.3	\$950	\$285	Email to Claudia Coke re responsibilities of class representative; include duties document	Class Outreach and Contact
6/7/2017	Sarah Colby	0.1	\$950	\$95	Email from CCDA re submission of demand letter; forward to co-counsel	Communications With Opposing Counsel
6/7/2017	Sarah Colby	0.2	\$950	\$190	CW GBW re complaint and cw Sharon and other class members	Pleadings and Motions Re: Pleadings
6/7/2017	Sarah Colby	0.2	\$950	\$190	CW GBW re injunctive relief request	Pleadings and Motions Re: Pleadings
6/7/2017	Sarah Colby	2.7	\$950	\$2,565	Drafting ADA, intro and class allegations portion of complaint	Pleadings and Motions Re: Pleadings
6/8/2017	Jennifer Bybee	0.1	\$925	\$93	Phone call to M. Tilton re continuing call from yesterday; voicemail; message to SSC re same	Class Outreach and Contact
6/8/2017	Jennifer Bybee	1.4	\$925	\$1,295	Research re what reasonable modifications have been ordered by courts re transportation; notes re same	Misc. Research
6/8/2017	Jennifer Bybee	0.8	\$925	\$740	Research re what reasonable modifications have been ordered by courts re paratransit; notes re same	Misc. Research
6/8/2017	Jennifer Bybee	1.4	\$925	\$1,295	Draft summary of all reasonable modification / accommodation research; email GBW re same	Misc. Research
6/8/2017	Sarah Colby	5.0	\$950	\$4,750	Drafting complaint	Pleadings and Motions Re: Pleadings
6/9/2017	Guy Wallace	2.8	\$1,350	\$3,780	legal research and analysis re ADA duty to make reasonable modifications in policy and/or practice; com's with JAU re same	Pleadings and Motions Re: Pleadings
6/9/2017	Jennifer Bybee	0.7	\$925	\$648	Com's with M. Tilton re Brookdale Brookhurst	Class Outreach and Contact
6/9/2017	Jennifer Bybee	1.0	\$925	\$925	Draft memo / email of conversation with M. Tilton to GBW, SSC and K. Knapp	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/9/2017	Jennifer Bybee	2.1	\$925	\$1,943	Research re reasonable accommodations and undue burden are questions of fact; email GBW re results of same	Misc. Research
6/9/2017	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re research and complaint	Pleadings and Motions Re: Pleadings
6/9/2017	Sarah Colby	4.4	\$950	\$4,180	Drafting complaint	Pleadings and Motions Re: Pleadings
6/10/2017	Sarah Colby	2.7	\$950	\$2,565	Drafting complaint	Pleadings and Motions Re: Pleadings
6/11/2017	Sarah Colby	4.2	\$950	\$3,990	Drafting complaint	Pleadings and Motions Re: Pleadings
6/12/2017	Guy Wallace	3.3	\$1,350	\$4,455	review and analysis of draft of ADA allegations for complaint; com's with JAU re same (.4); analysis of issues re RMIP theory and duty	Pleadings and Motions Re: Pleadings
6/12/2017	Jennifer Bybee	0.6	\$925	\$555	Review Brookdale complaint; com's with GBW re next steps and who does what	Pleadings and Motions Re: Pleadings
6/12/2017	Sarah Colby	2.9	\$950	\$2,755	Drafting complaint	Pleadings and Motions Re: Pleadings
6/13/2017	Jennifer Bybee	0.3	\$925	\$278	Com's with S. Eidler re Complaint	Pleadings and Motions Re: Pleadings
6/13/2017	Jennifer Bybee	0.3	\$925	\$278	Email to S. Eidler re complaint; email to S. Stiner re complaint; email to K. Knapp re S. Stiner	Pleadings and Motions Re: Pleadings
6/13/2017	Jennifer Bybee	3.4	\$925	\$3,145	Draft and revise complaint	Pleadings and Motions Re: Pleadings
6/14/2017	Guy Wallace	1.7	\$1,350	\$2,295	preparation of theory and allegations re ADA claim and RMIP	Pleadings and Motions Re: Pleadings
6/14/2017	Jennifer Bybee	0.7	\$925	\$648	Com's with S. Stiner and R. Stiner re complaint	Pleadings and Motions Re: Pleadings
6/14/2017	Jennifer Bybee	1.3	\$925	\$1,203	Com's with S. Eidler re complaint	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/14/2017	Jennifer Bybee	1.3	\$925	\$1,203	Research re standard for awarding treble damages under Unruh act; com's with GBW re same	Pleadings and Motions Re: Pleadings
6/14/2017	Jennifer Bybee	2.0	\$925	\$1,850	Draft and revise complaint; email same to GBW	Pleadings and Motions Re: Pleadings
6/15/2017	Guy Wallace	1.3	\$1,350	\$1,755	preparation and drafting of P's Complaint; com's with GG re same (.3)	Pleadings and Motions Re: Pleadings
6/16/2017	Guy Wallace	0.7	\$1,350	\$945	preparation of draft complaint	Pleadings and Motions Re: Pleadings
6/16/2017	Jennifer Bybee	0.6	\$925	\$555	Com's with GBW re complaint	Pleadings and Motions Re: Pleadings
6/18/2017	Guy Wallace	3.8	\$1,350	\$5,130	preparation and drafting of allegations re RMIP and common questions re same	Pleadings and Motions Re: Pleadings
6/19/2017	Guy Wallace	7.2	\$1,350	\$9,720	preparation and drafting of complaint re ADA claim; com's with JAU re same (.5)	Pleadings and Motions Re: Pleadings
6/19/2017	Jennifer Bybee	2.0	\$925	\$1,850	Research complaints detailing emergency evacuation procedures; com's with GBW and K. Knapp re same	Misc. Research
6/19/2017	Jennifer Bybee	0.1	\$925	\$93	Review emails to and from co-counsel re filing complaint	Pleadings and Motions Re: Pleadings
6/20/2017	Guy Wallace	1.4	\$1,350	\$1,890	preparation and drafting of ADA allegations	Pleadings and Motions Re: Pleadings
6/20/2017	Guy Wallace	2.7	\$1,350	\$3,645	preparation and drafting of ADA allegations for draft complaint	Pleadings and Motions Re: Pleadings
6/20/2017	Guy Wallace	0.6	\$1,350	\$810	tc with GG; CH; KAS; KJK; JAU re preparation of complaint and timeline re same	Pleadings and Motions Re: Pleadings
6/20/2017	Guy Wallace	0.5	\$1,350	\$675	com's with JAU re preparation of complaint; CLRA letter	Pleadings and Motions Re: Pleadings
6/20/2017	Jennifer Bybee	0.2	\$925	\$185	Com's with SSC re delivery of 6/3 letter; com's with GBW re same; look up service rule; look up delivery date on USPS website	Misc. Research

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/20/2017	Jennifer Bybee	0.6	\$925	\$555	Conference call with GBW, G. Grunfeld, C. Hu, K. Stebner and K. Knapp re complaint	Pleadings and Motions Re: Pleadings
6/20/2017	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re complaint	Pleadings and Motions Re: Pleadings
6/20/2017	Jennifer Bybee	2.9	\$925	\$2,683	Merge GBW and G. Grunfeld version of complaint	Pleadings and Motions Re: Pleadings
6/21/2017	Guy Wallace	3.6	\$1,350	\$4,860	conf with Bonita Hager re problems at Brookdale and draft Complaint; travel to and from meeting	Pleadings and Motions Re: Pleadings
6/21/2017	Guy Wallace	0.8	\$1,350	\$1,080	preparation of notes re meeting with Bonita Hager & com's with JAU re same and preparation of draft Complaint	Pleadings and Motions Re: Pleadings
6/21/2017	Jennifer Bybee	7.6	\$925	\$7,030	Merge GBW draft complaint and draft RBGG complaint into single draft complaint; edit same; com's with GBW re same	Pleadings and Motions Re: Pleadings
6/22/2017	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of draft complaint and com's with JAU re same	Pleadings and Motions Re: Pleadings
6/22/2017	Jennifer Bybee	5.4	\$925	\$4,995	Edit and revise complaint; email same to GBW	Pleadings and Motions Re: Pleadings
6/23/2017	Guy Wallace	1.4	\$1,350	\$1,890	review and analysis of draft complaint; revise and edit same	Pleadings and Motions Re: Pleadings
6/23/2017	Jennifer Bybee	4.2	\$925	\$3,885	Create redline of draft complaint	Pleadings and Motions Re: Pleadings
6/24/2017	Jennifer Bybee	2.0	\$925	\$1,850	Create redline of draft complaint; create clean version; email both to GBW	Pleadings and Motions Re: Pleadings
6/25/2017	Guy Wallace	2.7	\$1,350	\$3,645	revise and edit draft complaint	Pleadings and Motions Re: Pleadings
6/26/2017	Guy Wallace	4.1	\$1,350	\$5,535	review and analysis of draft complaint; revise and edit same	Pleadings and Motions Re: Pleadings
6/26/2017	Guy Wallace	0.7	\$1,350	\$945	tc with SC; JAU re revisions to the draft complaint and issues re legal theory	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/26/2017	Jennifer Bybee	0.9	\$925	\$833	Com's with GBW and SSC re complaint	Pleadings and Motions Re: Pleadings
6/26/2017	Sarah Colby	0.1	\$950	\$95	TC Kelly Knapp re GAL allegations in complaint	Pleadings and Motions Re: Pleadings
6/26/2017	Sarah Colby	0.2	\$950	\$190	TC Kelly re class members for complaint	Pleadings and Motions Re: Pleadings
6/26/2017	Sarah Colby	4.8	\$950	\$4,560	review/edit complaint	Pleadings and Motions Re: Pleadings
6/26/2017	Sarah Colby	0.2	\$950	\$190	Emails from and to co-co re GAL declaration, including probate code sections	Pleadings and Motions Re: Pleadings
6/26/2017	Sarah Colby	2.1	\$950	\$1,995	Meeting with GBW to discuss edits/changes to complaint; includes call with JAU/GBW re same (.8)	Pleadings and Motions Re: Pleadings
6/26/2017	Sarah Colby	1.4	\$950	\$1,330	Editing complaint	Pleadings and Motions Re: Pleadings
6/27/2017	Guy Wallace	5.2	\$1,350	\$7,020	revise and edit draft complaint; com's with co-counsel re same (.6)	Pleadings and Motions Re: Pleadings
6/27/2017	Jennifer Bybee	0.1	\$925	\$93	Com's with SSC re complaint	Pleadings and Motions Re: Pleadings
6/27/2017	Sarah Colby	0.5	\$950	\$475	TC Prescott from CANHR re potential witness	Case Organization, Planning and Strategy
6/27/2017	Sarah Colby	0.2	\$950	\$190	Review JAU memo re Brookhurst resident and email to and from KK/JAU/GBW re possible witnesses/class reps	Class Outreach and Contact
6/27/2017	Sarah Colby	0.2	\$950	\$190	TC JAU re complaint, CLRA claim	Pleadings and Motions Re: Pleadings
6/27/2017	Sarah Colby	0.1	\$950	\$95	TC GBW re status of complaint and issues to discuss with co-counsel	Pleadings and Motions Re: Pleadings
6/27/2017	Sarah Colby	0.1	\$950	\$95	Draft list of issues to discuss with co-counsel on complaint	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/27/2017	Sarah Colby	0.7	\$950	\$665	Editing complaint	Pleadings and Motions Re: Pleadings
6/27/2017	Sarah Colby	0.1	\$950	\$95	TC Kelly re complaint/witness/clra claim	Pleadings and Motions Re: Pleadings
6/27/2017	Sarah Colby	0.1	\$950	\$95	Emails with co-counsel re complaint and CLRA claim	Pleadings and Motions Re: Pleadings
6/27/2017	Sarah Colby	0.1	\$950	\$95	TC GBW re CLRA claim and potential CNA witness	Pleadings and Motions Re: Pleadings
6/27/2017	Sarah Colby	2.3	\$950	\$2,185	Drafting/Editing complaint	Pleadings and Motions Re: Pleadings
6/27/2017	Sarah Colby	0.1	\$950	\$95	Review latest draft of complaint and draft list of issues to discuss with GBW	Pleadings and Motions Re: Pleadings
6/27/2017	Sarah Colby	0.1	\$950	\$95	Email to Mark Redmond re potential witness	Pleadings and Motions Re: Pleadings
6/27/2017	Sarah Colby	1.0	\$950	\$950	Research on profits and finances of Brookdale; emails and TC GBW re same (.3)	Pleadings and Motions Re: Pleadings
6/28/2017	Guy Wallace	4.1	\$1,350	\$5,535	revise and edit draft complaint; preparation of list of issues to discuss with co-counsel re same	Pleadings and Motions Re: Pleadings
6/28/2017	Guy Wallace	1.1	\$1,350	\$1,485	prepare for and participate in team call with GG; Chris Hu; Ben Bien-Kahn; KJK; SC	Pleadings and Motions Re: Pleadings
6/28/2017	Jennifer Bybee	1.1	\$925	\$1,018	Conference call with co-counsel re complaint	Pleadings and Motions Re: Pleadings
6/28/2017	Sarah Colby	0.5	\$950	\$475	Review resident agreement, disability definitions, and GBW list of issues remaining for complaint	Pleadings and Motions Re: Pleadings
6/28/2017	Sarah Colby	1.1	\$950	\$1,045	Conf call with co-counsel re remaining issues re complaint	Pleadings and Motions Re: Pleadings
6/28/2017	Sarah Colby	0.1	\$950	\$95	CW GBW re outstanding issues re complaint	Pleadings and Motions Re: Pleadings
6/28/2017	Sarah Colby	1.0	\$950	\$950	Research on availability of treble and punitive damages	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/29/2017	Guy Wallace	0.4	\$1,350	\$540	com's with SC and KJK re further revisions to draft Complaint	Pleadings and Motions Re: Pleadings
6/29/2017	Sarah Colby	1.0	\$950	\$950	Research on Civ. Code 3345/3294	Pleadings and Motions Re: Pleadings
6/29/2017	Sarah Colby	0.2	\$950	\$190	CW GBW re Civ. Code 3345/3294	Pleadings and Motions Re: Pleadings
6/29/2017	Sarah Colby	0.4	\$950	\$380	TC KK/GBW re framing of ADA claim in complaint	Pleadings and Motions Re: Pleadings
6/29/2017	Sarah Colby	1.3	\$950	\$1,235	Review docs signed/received by Stiner, Eidler; review changes to complaint and cw gbw re same	Pleadings and Motions Re: Pleadings
6/30/2017	Sarah Colby	0.1	\$950	\$95	Emails from and to GBW re misrepresentation claim and meeting with class member	Pleadings and Motions Re: Pleadings
6/30/2017	Sarah Colby	0.2	\$950	\$190	CW KK re misrepresentation allegations and staffing salaries	Pleadings and Motions Re: Pleadings
6/30/2017	Sarah Colby	0.9	\$950	\$855	Research on salary levels and reviews of management by current and former employees; emails with kk/gbw re same	Pleadings and Motions Re: Pleadings
6/30/2017	Sarah Colby	0.4	\$950	\$380	Reviewed residency agreements and notes; lm for Rita Stiner, Sharon Eidler, and Danielle Hafdal to discuss those with them in terms of complaint allegations	Pleadings and Motions Re: Pleadings
6/30/2017	Sarah Colby	0.1	\$950	\$95	TC Kelly re class rep allegations in complaint	Pleadings and Motions Re: Pleadings
6/30/2017	Sarah Colby	1.0	\$950	\$950	Draft memo re punis/trebling	Pleadings and Motions Re: Pleadings
7/3/2017	Sarah Colby	0.2	\$950	\$190	Review memo from KK re successor liability	Case Organization, Planning and Strategy
7/3/2017	Sarah Colby	0.6	\$950	\$570	Review misrepresentation/omission claim language in complaint, review resident agreements and form letters, LM for Sharon Eidler and for Rita Stiner	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/3/2017	Sarah Colby	1.3	\$950	\$1,235	TC Sharon Eidler re recent developments; GAL declaration; misrepresentation claims.	Pleadings and Motions Re: Pleadings
7/3/2017	Sarah Colby	0.6	\$950	\$570	TC Rita Stiner re residency agreement/misrepresentation claim/docs from Brookdal/complaint	Pleadings and Motions Re: Pleadings
7/3/2017	Sarah Colby	0.1	\$950	\$95	TC Rita Stiner (2nd) re documents from Brookdale	Pleadings and Motions Re: Pleadings
7/3/2017	Sarah Colby	0.4	\$950	\$380	Research on reasonable modifications of policy for drafting complaint	Pleadings and Motions Re: Pleadings
7/5/2017	Guy Wallace	3.4	\$1,350	\$4,590	review and analysis of draft complaint; revise and edit same	Pleadings and Motions Re: Pleadings
7/5/2017	Guy Wallace	2.2	\$1,350	\$2,970	conf with GG; CH; KJK; SC re draft complaint and revisions re same	Pleadings and Motions Re: Pleadings
7/5/2017	Sarah Colby	0.3	\$950	\$285	Research on several facilities for complaint allegations	Pleadings and Motions Re: Pleadings
7/5/2017	Sarah Colby	3.9	\$950	\$3,705	Review/edit latest draft of complaint	Pleadings and Motions Re: Pleadings
7/5/2017	Sarah Colby	2.1	\$950	\$1,995	Meeting re complaint	Pleadings and Motions Re: Pleadings
7/5/2017	Sarah Colby	0.3	\$950	\$285	CW GBW re making edits to complaint	Pleadings and Motions Re: Pleadings
7/6/2017	Guy Wallace	2.9	\$1,350	\$3,915	legal research and analysis re fees and costs provisions of ADA and Unruh Act, including prevailing party provision as applied to plaintiffs and defendants	Pleadings and Motions Re: Pleadings
7/6/2017	Guy Wallace	0.3	\$1,350	\$405	com's with SC re preparation of complaint	Pleadings and Motions Re: Pleadings
7/6/2017	Sarah Colby	1.1	\$950	\$1,045	TC Chris and Sharon Eidler re misrepresentation allegations and guardian ad litem declaration	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/6/2017	Sarah Colby	0.1	\$950	\$95	Review memo re fee-shifting in CLRA/Elder abuse	Pleadings and Motions Re: Pleadings
7/6/2017	Sarah Colby	0.2	\$950	\$190	CW GBW re POA/GAL issues and potential class rep	Pleadings and Motions Re: Pleadings
7/6/2017	Sarah Colby	0.2	\$950	\$190	TC Gay Grunfeld re POA/GAL issues	Pleadings and Motions Re: Pleadings
7/6/2017	Sarah Colby	0.3	\$950	\$285	Research on GAL and email codes and examples to GGrunfeld	Pleadings and Motions Re: Pleadings
7/6/2017	Sarah Colby	2.3	\$950	\$2,185	editing complaint	Pleadings and Motions Re: Pleadings
7/6/2017	Sarah Colby	2.0	\$950	\$1,900	Editing complaint, includes reviewing client docs/notes	Pleadings and Motions Re: Pleadings
7/7/2017	Guy Wallace	4.2	\$1,350	\$5,670	preparation and drafting of memo re fee shifting provisions of ADA; Unruh Act; com's with co-counsel re same (.2)	Pleadings and Motions Re: Pleadings
7/7/2017	Guy Wallace	0.4	\$1,350	\$540	com's with SC re preparation of complaint	Pleadings and Motions Re: Pleadings
7/7/2017	Sarah Colby	0.1	\$950	\$95	Emails from and to Sharon re CCL appearance at facility	Case Organization, Planning and Strategy
7/7/2017	Sarah Colby	0.1	\$950	\$95	Emails with PNC and GBW re meeting in Riverside	Class Outreach and Contact
7/7/2017	Sarah Colby	0.5	\$950	\$475	TC GBW re misrepresentations claim and docs from client in relation to complaint	Pleadings and Motions Re: Pleadings
7/7/2017	Sarah Colby	4.9	\$950	\$4,655	Editing complaint; email GG with latest draft	Pleadings and Motions Re: Pleadings
7/8/2017	Guy Wallace	4.4	\$1,350	\$5,940	legal research and analysis re class certification standards re ascertainability; typicality; types of damages claims	Pleadings and Motions Re: Pleadings
7/8/2017	Sarah Colby	0.1	\$950	\$95	Emails from GG re meetings with clients and client comments on draft complaint	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/9/2017	Sarah Colby	5.8	\$950	\$5,510	Editing complaint (includes review of documents from client)	Pleadings and Motions Re: Pleadings
7/10/2017	Guy Wallace	2.7	\$1,350	\$3,645	revise and edit further draft of complaint; com's with SC re same (.5)	Pleadings and Motions Re: Pleadings
7/10/2017	Sarah Colby	3.7	\$950	\$3,515	Editing complaint; email to co-counsel with latest draft and issues to discuss	Pleadings and Motions Re: Pleadings
7/10/2017	Sarah Colby	0.1	\$950	\$95	Email draft of complaint to client with questions	Pleadings and Motions Re: Pleadings
7/10/2017	Sarah Colby	0.1	\$950	\$95	Email from Chris and Sharon Eidler re GAL; email from and to GBW re same	Pleadings and Motions Re: Pleadings
7/10/2017	Sarah Colby	0.3	\$950	\$285	TC Gay Grunfeld re complaint/GAL applications/defendant allegations	Pleadings and Motions Re: Pleadings
7/10/2017	Sarah Colby	0.1	\$950	\$95	Email to KK and GK re GAL applications	Pleadings and Motions Re: Pleadings
7/10/2017	Sarah Colby	0.1	\$950	\$95	Email to co-co re issue of co-defendants	Pleadings and Motions Re: Pleadings
7/10/2017	Sarah Colby	0.8	\$950	\$760	TC Chris and Sharon Eidler re complaint/claims alleged/GAL issues	Pleadings and Motions Re: Pleadings
7/10/2017	Sarah Colby	0.1	\$950	\$95	Email Chris/Sharon Eidler re complaint/getting docs/GAL	Pleadings and Motions Re: Pleadings
7/10/2017	Sarah Colby	0.1	\$950	\$95	Emails with co-counsel re press release	Pleadings and Motions Re: Pleadings
7/10/2017	Sarah Colby	0.2	\$950	\$190	Review GAL declarations in other cases as models for declarations in this case	Pleadings and Motions Re: Pleadings
7/10/2017	Sarah Colby	0.8	\$950	\$760	Online research re relationship between defendants; review SEC filings	Pleadings and Motions Re: Pleadings
7/11/2017	Guy Wallace	6.6	\$1,350	\$8,910	review and analysis of further draft of Complaint; revise and edit same	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/11/2017	Guy Wallace	2.4	\$1,350	\$3,240	legal research and analysis re CLRA claims and sufficiency of same for class allegations; reasonable consumer and reasonable expectations standards	Pleadings and Motions Re: Pleadings
7/11/2017	Jennifer Bybee	0.5	\$925	\$463	Com's with class member M. Tilton; email summary to convo to SSC and GBW	Class Outreach and Contact
7/11/2017	Sarah Colby	2.8	\$950	\$2,660	Meeting with Stacia Stiner (includes travel to and from) to go over complaint	Pleadings and Motions Re: Pleadings
7/11/2017	Sarah Colby	0.4	\$950	\$380	TC Rita Stiner re complaint/residency agreements/meeting with stacy	Pleadings and Motions Re: Pleadings
7/11/2017	Sarah Colby	0.3	\$950	\$285	Review docs from Stacia/Rita Stiner for complaint	Pleadings and Motions Re: Pleadings
7/11/2017	Sarah Colby	0.3	\$950	\$285	TC GBW re status of complaint/GAL declarations/getting Hager docs	Pleadings and Motions Re: Pleadings
7/11/2017	Sarah Colby	0.1	\$950	\$95	Emails with GG et al re getting documents from clients and GAL decs	Pleadings and Motions Re: Pleadings
7/11/2017	Sarah Colby	0.5	\$950	\$475	TC Sharon and Chris re complaint and GAL declaration	Pleadings and Motions Re: Pleadings
7/11/2017	Sarah Colby	0.4	\$950	\$380	TC GBW x 2 re issues re complaint, GAL and meeting with class rep	Pleadings and Motions Re: Pleadings
7/11/2017	Sarah Colby	0.5	\$950	\$475	TC JAU re remaining issues left to complete complaint	Pleadings and Motions Re: Pleadings
7/11/2017	Sarah Colby	2.0	\$950	\$1,900	Editing complaint	Pleadings and Motions Re: Pleadings
7/12/2017	Guy Wallace	2.4	\$1,350	\$3,240	meet with potential class representative re Brookdale Hemet; SC re complaint	Pleadings and Motions Re: Pleadings
7/12/2017	Guy Wallace	0.5	\$1,350	\$675	com's with GG; SC re revisions to draft complaint, finalization of same	Pleadings and Motions Re: Pleadings
7/12/2017	Sarah Colby	0.3	\$950	\$285	TC Gay Grunfeld re remaining changes to complaint/GAL declarations/filing	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/12/2017	Sarah Colby	0.6	\$950	\$570	Review Co-counsel and GBW edits to complaint; CW GBW re same	Pleadings and Motions Re: Pleadings
7/13/2017	Guy Wallace	3.8	\$1,350	\$5,130	revise and edit Complaint; briefs re guardian ad litem; com's with GG; SC re same (.9)	Pleadings and Motions Re: Pleadings
7/13/2017	Guy Wallace	0.3	\$1,350	\$405	com's with AK re D's message and complaint, meeting between counsel	Pleadings and Motions Re: Pleadings
7/13/2017	Sarah Colby	0.1	\$950	\$95	Emails from and to Kelly re calls with residents from other Brookdale facilities	Class Outreach and Contact
7/13/2017	Sarah Colby	0.1	\$950	\$95	Edit Chris Eidler GAL declaration and email to him re same	Pleadings and Motions Re: Pleadings
7/13/2017	Sarah Colby	1.3	\$950	\$1,235	TC Sharon Eidler going over the complaint and making edits	Pleadings and Motions Re: Pleadings
7/13/2017	Sarah Colby	3.1	\$950	\$2,945	Incorporate edits and comments into complaint	Pleadings and Motions Re: Pleadings
7/13/2017	Sarah Colby	0.1	\$950	\$95	TC Sharon re MG agreement and other docs in Patricia's file; email with GBW and Sharon re same	Pleadings and Motions Re: Pleadings
7/13/2017	Sarah Colby	0.1	\$950	\$95	Emails with Chris Eidler re GAL declaration and additional edits to declaration	Pleadings and Motions Re: Pleadings
7/13/2017	Sarah Colby	0.6	\$950	\$570	Draft administrative motion for GAL appointment; discussion with GBW; incorporate gBW's edits	Pleadings and Motions Re: Pleadings
7/13/2017	Sarah Colby	5.9	\$950	\$5,605	incorporate edits into complaint; cw GBW re additional edits/comments to complaint and finalize all papers for filing; multiple cw SM and GBW re finalizing papers for filing	Pleadings and Motions Re: Pleadings
7/14/2017	Guy Wallace	1.3	\$1,350	\$1,755	review and analysis of assignment to Judge Donato and Court's Standing Orders	Case Organization, Planning and Strategy
7/14/2017	Guy Wallace	0.7	\$1,350	\$945	com's with co-counsel re media and inquiries from same	Case Organization, Planning and Strategy
7/14/2017	Sarah Colby	0.2	\$950	\$190	TC GBW to discuss Judge's standing orders and summons	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/14/2017	Sarah Colby	0.5	\$950	\$475	Email from GBW re judicial assignment; research re Judge Donato; CW GBW re research re Judge Donato; download and email standing orders to co-counsel	Case Organization, Planning and Strategy
7/14/2017	Sarah Colby	0.1	\$950	\$95	Emails to and from GG re ECF notice to co-counsel; cw SM re contacting clerk re same	Case Organization, Planning and Strategy
7/14/2017	Sarah Colby	0.1	\$950	\$95	Emails with GG/GBW re McKnight's and other inquiries and re distribution of press release	Case Organization, Planning and Strategy
7/14/2017	Sarah Colby	0.2	\$950	\$190	TC GBW re next steps following service of complaint	Case Organization, Planning and Strategy
7/14/2017	Sarah Colby	0.1	\$950	\$95	Email from and to JAU re cw class member in Orange County	Class Outreach and Contact
7/14/2017	Sarah Colby	0.4	\$950	\$380	Review Judge's standing orders and emails to JAU/GBW re same	Pleadings and Motions Re: Pleadings
7/14/2017	Sarah Colby	0.1	\$950	\$95	Review Summons and cw SM re edit	Pleadings and Motions Re: Pleadings
7/14/2017	Sarah Colby	0.3	\$950	\$285	Draft proposed order on administrative motion re GAL	Pleadings and Motions Re: Pleadings
7/14/2017	Sarah Colby	0.2	\$950	\$190	Emails with Sharon and Chris re filing of complaint and getting Patricia's and Bonita's files; cw gbw re same	Pleadings and Motions Re: Pleadings
7/14/2017	Sarah Colby	0.1	\$950	\$95	Emails and CW SM re summons	Pleadings and Motions Re: Pleadings
7/15/2017	Sarah Colby	0.1	\$950	\$95	Email from GG; email to GBW re strategy/next steps	Case Organization, Planning and Strategy
7/17/2017	Sarah Colby	0.1	\$950	\$95	Email from and to Sharon re meeting with class rep	Case Organization, Planning and Strategy
7/17/2017	Sarah Colby	0.1	\$950	\$95	Email with TS/GBW re putting article on website as class member outreach	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/18/2017	Sarah Colby	0.1	\$950	\$95	TC KK re experts	Case Organization, Planning and Strategy
7/18/2017	Sarah Colby	1.1	\$950	\$1,045	Review articles regarding staffing and outcomes in LTC for development of injunctive relief requests	Case Organization, Planning and Strategy
7/19/2017	Sarah Colby	0.3	\$950	\$285	MF Sharon re complaint and recent developments; review family council notes	Case Organization, Planning and Strategy
7/19/2017	Sarah Colby	0.1	\$950	\$95	LM KK re status at BSR	Case Organization, Planning and Strategy
7/19/2017	Sarah Colby	0.2	\$950	\$190	TC GBW re site inspections/discovery plan/meeting with co-co	Case Organization, Planning and Strategy
7/19/2017	Sarah Colby	0.4	\$950	\$380	TC Sharon re records/status re staffing at facility/problems with transportation; email articles to Sharon and Chris	Case Organization, Planning and Strategy
7/19/2017	Sarah Colby	0.1	\$950	\$95	TCF Rita Stiner re docs provided to Stacy by Brookdale	Case Organization, Planning and Strategy
7/19/2017	Sarah Colby	0.1	\$950	\$95	TC Sharon re Stacy's records	Case Organization, Planning and Strategy
7/19/2017	Sarah Colby	0.2	\$950	\$190	tc GBW re GO 56/site inspections for Brookdale facilities	Discovery (Non-Deposition)
7/20/2017	Jennifer Bybee	0.5	\$925	\$463	Review emails between co-counsel re judicial assignment; review J. Donato's standing orders; review articles re case filing	Case / Document Administration
7/20/2017	Jennifer Bybee	1.3	\$925	\$1,203	Draft PRA requests for Brookdale San Ramon; com's with B. Bien-Kahn re same; set up producteev for mailing of same	Discovery (Non-Deposition)
7/20/2017	Sarah Colby	2.3	\$950	\$2,185	meeting with Sharon Eidler to discuss family council meeting/discussions with residents/discussions with brook dale management re burglary/staffing issues	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/20/2017	Sarah Colby	0.4	\$950	\$380	TC Sandy Horowitz re his previous case against Fountaingrove facility (.2); review case docs from Sandy	Case Organization, Planning and Strategy
7/20/2017	Sarah Colby	0.1	\$950	\$95	Email and tC JAU re public information requests from emergency responders to facilities	Case Organization, Planning and Strategy
7/20/2017	Sarah Colby	0.1	\$950	\$95	Review email from GG from Rohnert Park facility resident with co to facility	Case Organization, Planning and Strategy
7/20/2017	Sarah Colby	2.2	\$950	\$2,090	Meeting with Bonita Hager to go over complaint and her chart (includes travel time to and from San Ramon)	Pleadings and Motions Re: Pleadings
7/21/2017	Sarah Colby	0.1	\$950	\$95	Email to co-counsel about evidence preservation letters	Case Organization, Planning and Strategy
7/21/2017	Sarah Colby	0.1	\$950	\$95	Email to GG et al re amended complaint/class member contacts and chart/potential class reps	Pleadings and Motions Re: Pleadings
7/21/2017	Sarah Colby	0.2	\$950	\$190	TC GBW re outstanding issues with complaint and preparation for filing	Pleadings and Motions Re: Pleadings
7/24/2017	Jennifer Bybee	0.1	\$925	\$93	Review RBGG memos re recent conversations with putative class members	Class Outreach and Contact
7/25/2017	Jennifer Bybee	0.3	\$925	\$278	Com's with SSC re requests from emergency providers; email to co-counsel re same	Discovery (Non-Deposition)
7/25/2017	Sarah Colby	0.1	\$950	\$95	VM from Sharon re FC meeting; email Sharon re same	Case Organization, Planning and Strategy
7/25/2017	Sarah Colby	0.1	\$950	\$95	Review KK memo re Anaheim Hills resident; email with co-co re same; emails with KK re visiting resident	Class Outreach and Contact
7/25/2017	Sarah Colby	0.2	\$950	\$190	Review articles in McKnights and Senior Housing News re case	Misc. Research
7/26/2017	Sarah Colby	0.1	\$950	\$95	Email from Sharon Eidler with notes of FC meeting last night	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/26/2017	Sarah Colby	0.1	\$950	\$95	VM x 2 from client; review email from client to ED Brookdale San Ramon and response; email client re same	Case Organization, Planning and Strategy
7/26/2017	Sarah Colby	0.6	\$950	\$570	Research on cases filed against Brookdale in N.D. Cal.	Case Organization, Planning and Strategy
7/26/2017	Sarah Colby	0.1	\$950	\$95	Emails to and from coco re litigation hold issues	Case Organization, Planning and Strategy
7/26/2017	Sarah Colby	0.4	\$950	\$380	Edit memo to clients re preserving docs and data	Discovery (Non-Deposition)
7/26/2017	Sarah Colby	0.1	\$950	\$95	CW GBW re potential motions to file	Other Motions
7/26/2017	Sarah Colby	0.1	\$950	\$95	TC GBW re potential class rep in Anaheim	Pleadings and Motions Re: Pleadings
7/26/2017	Sarah Colby	0.1	\$950	\$95	Email with co-co re potential class rep	Pleadings and Motions Re: Pleadings
7/26/2017	Sarah Colby	0.1	\$950	\$95	Review proofs of service; instruct SM to file	Pleadings and Motions Re: Pleadings
7/27/2017	Guy Wallace	1.8	\$1,350	\$2,430	preparation of preservation letter to Defendant and review of legal issues re same including ESI preservation requirements	Discovery (Non-Deposition)
7/27/2017	Jennifer Bybee	0.1	\$925	\$93	Review emails re potential class rep Prusia and recent email re Helen Carlson post case filing	Class Outreach and Contact
7/27/2017	Sarah Colby	0.1	\$950	\$95	Review email from Sharon and forward to co-co with questions re additional claims and possible class rep	Case Organization, Planning and Strategy
7/27/2017	Sarah Colby	0.1	\$950	\$95	Email with co-co re edits to litigation hold memo to clients	Discovery (Non-Deposition)
7/27/2017	Sarah Colby	0.2	\$950	\$190	Disc with GBW re sending out a litigation hold memo; review previous hold letter send in another case; send standing order to GBW	Discovery (Non-Deposition)
7/27/2017	Sarah Colby	2.4	\$950	\$2,280	Legal research/CW GBW/Draft memo re issue of class certification and standing wrt class reps with different disabilities	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/27/2017	Sarah Colby	0.3	\$950	\$285	Emails with co-co re possible class rep and issues raised in complaint; email Sharon re same.	Pleadings and Motions Re: Pleadings
7/27/2017	Sarah Colby	0.2	\$950	\$190	CW GBW about adding potential rep/amending complaint	Pleadings and Motions Re: Pleadings
7/28/2017	Guy Wallace	0.9	\$1,350	\$1,215	preparation of letter re preservation of documents and ESI; legal research and analysis re same	Case Organization, Planning and Strategy
7/28/2017	Sarah Colby	0.1	\$950	\$95	CW GBW re emails from Chris Eidler; Email to Chris Eidler re moving mom	Case Organization, Planning and Strategy
7/29/2017	Guy Wallace	1.9	\$1,350	\$2,565	legal research and analysis re preservation duty re ESI and Rule 26 obligations of defendant	Discovery (Non-Deposition)
7/29/2017	Sarah Colby	0.1	\$950	\$95	Email from and to GG re Brookdale's retaliation and threatening behavior toward ombudsman and residents/family members in relation to the lawsuit.	Case Organization, Planning and Strategy
7/30/2017	Guy Wallace	2.8	\$1,350	\$3,780	preparation and drafting of letter to Defendant re document preservation and ESI	Discovery (Non-Deposition)
7/31/2017	Guy Wallace	0.9	\$1,350	\$1,215	preparation and drafting of preservation letter re ESI	Discovery (Non-Deposition)
7/31/2017	Sarah Colby	0.3	\$950	\$285	Review memos re JD opinions and conversations with class members	Case Organization, Planning and Strategy
7/31/2017	Sarah Colby	0.2	\$950	\$190	Email from and to Loresia re complaint/amended complaint	Case Organization, Planning and Strategy
8/1/2017	Sarah Colby	0.2	\$950	\$190	listen to message from CCL investigator re substantiation of complaint; review complaint investigation reports on CCL website	Case Organization, Planning and Strategy
8/1/2017	Sarah Colby	0.1	\$950	\$95	Email client records and case update to Loresia	Case Organization, Planning and Strategy
8/2/2017	Guy Wallace	0.7	\$1,350	\$945	com's with APK re request for extension of time re response to Complaint and meeting between counsel; com's with GCG and KAS re same	Case Organization, Planning and Strategy
8/2/2017	Sarah Colby	0.1	\$950	\$95	Email Loresia re records	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/2/2017	Sarah Colby	0.2	\$950	\$190	TC GG/GBW re Ds request for extension/meeting with OC	Case Organization, Planning and Strategy
8/2/2017	Sarah Colby	0.2	\$950	\$190	Review CCL report from Sharon/find and email CCL report on burglary to Sharon	Case Organization, Planning and Strategy
8/2/2017	Sarah Colby	0.1	\$950	\$95	TC KK re visiting class member in Anaheim	Class Outreach and Contact
8/2/2017	Sarah Colby	0.2	\$950	\$190	CW GBW re PNC in Paso Robles/records from facility and case issues/meeting with client	Class Outreach and Contact
8/2/2017	Sarah Colby	0.1	\$950	\$95	TC KAS/GBW re meeting with OC	Communications With Opposing Counsel
8/3/2017	Guy Wallace	4.7	\$1,350	\$6,345	preparation and drafting of letter to Defendant re preservation of records and ESI; revise and edit same	Depositions
8/3/2017	Sarah Colby	0.2	\$950	\$190	Email from Sharon re ED's refusal to respond to FC questions; look up H&S Code re same; respond to Sharon	Case Organization, Planning and Strategy
8/3/2017	Sarah Colby	0.4	\$950	\$380	Edit CO to clients re litigation hold	Case Organization, Planning and Strategy
8/3/2017	Sarah Colby	0.2	\$950	\$190	TC JAU re SRPD response to PRA request	Case Organization, Planning and Strategy
8/3/2017	Sarah Colby	0.2	\$950	\$190	Emails to each client re doc preservation	Case Organization, Planning and Strategy
8/3/2017	Sarah Colby	0.2	\$950	\$190	Review client communications and records; email client re meeting	Class Outreach and Contact
8/4/2017	Guy Wallace	2.7	\$1,350	\$3,645	prepare for and attend planning meeting re initial disclosures; motions on the pleadings; preparation for class certification; discovery with GCG; CH; KJK; SC; JAU	Case Organization, Planning and Strategy
8/4/2017	Guy Wallace	1.7	\$1,350	\$2,295	preparation and drafting of preservation letter to Defendants	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/4/2017	Guy Wallace	0.4	\$1,350	\$540	com's with APK re schedule on P's FAC and motions on the pleadings; revise and edit proposed stipulation re same	Pleadings and Motions Re: Pleadings
8/4/2017	Sarah Colby	0.1	\$950	\$95	CW GBW re FAC and Ds' response to complaint; review emails between GBW and OC re same	Pleadings and Motions Re: Pleadings
8/5/2017	Sarah Colby	0.1	\$950	\$95	Review opinion on MTD Fla case alleging misrepresentations re staffing against Brookdale	Case Organization, Planning and Strategy
8/5/2017	Sarah Colby	0.1	\$950	\$95	emails with class member re mother's condition and meeting	Class Outreach and Contact
8/5/2017	Sarah Colby	0.1	\$950	\$95	emails with Carmen Becker re mom's condition and meeting	Class Outreach and Contact
8/7/2017	Guy Wallace	0.3	\$1,350	\$405	review and analysis of stipulation re schedule; com's with OC re same and meet and confer	Case Organization, Planning and Strategy
8/7/2017	Jennifer Bybee	0.2	\$925	\$185	Review San Ramon PD response and documents provided in response to PRA request	Discovery (Non-Deposition)
8/10/2017	Guy Wallace	0.6	\$1,350	\$810	revise and edit document preservation letter	Discovery (Non-Deposition)
8/10/2017	Jennifer Bybee	0.1	\$925	\$93	Review email com's with co-counsel re Kaiser media contact, sale of Brookdale	Case Organization, Planning and Strategy
8/10/2017	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re CMC, call on 8/17, sale of Brookdale, etc.	Case Organization, Planning and Strategy
8/10/2017	Jennifer Bybee	0.1	\$925	\$93	Com's with San Ramon Fire Dept re PRA request	Discovery (Non-Deposition)
8/10/2017	Sarah Colby	0.1	\$950	\$95	Emails with KK re possible experts	Experts (Including Retention)
8/11/2017	Guy Wallace	0.4	\$1,350	\$540	revise and edit preservation letter to Ds	Discovery (Non-Deposition)
8/11/2017	Sarah Colby	0.1	\$950	\$95	Emails from and to KK re daughter of class member communications	Class Outreach and Contact
8/13/2017	Sarah Colby	0.1	\$950	\$95	Emails with KK re witness investigation	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/14/2017	Jennifer Bybee	0.7	\$925	\$648	Phone call with M. Tilton re current conditions at Brookdale Brookhurst; draft letter to M. Tilton enclosing Complaint and press release; create producteev for mailing of same	Class Outreach and Contact
8/14/2017	Jennifer Bybee	0.6	\$925	\$555	Research which PD and Fire Dept service Brookdale Brookhurst; draft PRA request letters to Westminster Police Department and Orange County Fire Authority; create producteev for mailing of same	Discovery (Non-Deposition)
8/14/2017	Jennifer Bybee	0.5	\$925	\$463	Review email from C. Hu re PRA requests; review Complaint for other facilities where we should make PRA requests; email to C. Hu re same	Discovery (Non-Deposition)
8/14/2017	Sarah Colby	0.2	\$950	\$190	Review Brookdale contract; draft write-in language; email GBW re same	Case Organization, Planning and Strategy
8/14/2017	Sarah Colby	0.1	\$950	\$95	email from and to client re moving mother and family council issues	Case Organization, Planning and Strategy
8/14/2017	Sarah Colby	0.1	\$950	\$95	Emails with co-co re flyers at Brookdale/file sharing	Case Organization, Planning and Strategy
8/15/2017	Jennifer Bybee	0.1	\$925	\$93	Review emails from co-counsel re press	Class Outreach and Contact
8/15/2017	Jennifer Bybee	0.8	\$925	\$740	Review call logs received from San Ramon PD in response to PRA request; call records person at San Ramon PD to get information on call type codes; create spreadsheet explaining call type codes; draft email to co-counsel with results of same	Discovery (Non-Deposition)
8/15/2017	Sarah Colby	0.1	\$950	\$95	Emails with CHu and AML re sharing of documents and class lists	Case Organization, Planning and Strategy
8/15/2017	Sarah Colby	0.1	\$950	\$95	Emails from and to clients re document preservation	Case Organization, Planning and Strategy
8/16/2017	Guy Wallace	0.4	\$1,350	\$540	com's with co-counsel re FAC, scheduling meet and confer with D's	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/16/2017	Sarah Colby	0.6	\$950	\$570	Review documents and law; draft CO to KohSweeney re Cull/Family Council.	Communications With Opposing Counsel
8/16/2017	Sarah Colby	0.1	\$950	\$95	CW GBW re letter to OC re Cull/Family council/forward to co-co for review	Communications With Opposing Counsel
8/16/2017	Sarah Colby	0.1	\$950	\$95	CW GBW re meeting with OC tomorrow; emails between GBW and OC re meeting	Communications With Opposing Counsel
8/17/2017	Guy Wallace	0.7	\$1,350	\$945	review and analysis of General Order 56 and its unsuitability for class action litigation and the non-access allegations in P's Complaint; com's with SC re preparation of admin motion to be relieved of GO 56	Case Organization, Planning and Strategy
8/17/2017	Guy Wallace	0.9	\$1,350	\$1,215	com's with APK; SC re preparation of FAC and stipulation and proposed order re schedule on same as well as D's response thereto	Pleadings and Motions Re: Pleadings
8/17/2017	Sarah Colby	0.5	\$950	\$475	TC Sharon Eidler about family's decision to move Pat; conditions at facility--firings, 5 employees have quit, AD and caregivers are serving food	Case Organization, Planning and Strategy
8/17/2017	Sarah Colby	0.1	\$950	\$95	Emails with co-co re FAC	Pleadings and Motions Re: Pleadings
8/17/2017	Sarah Colby	0.2	\$950	\$190	TC GBW re FAC allegations and applicability of G.O. 56 to case; email GBW and client re potential class rep	Pleadings and Motions Re: Pleadings
8/17/2017	Sarah Colby	4.4	\$950	\$4,180	review Bonita Hager files from BSR; review Lawrence Quinlan files from BH; edit FAC to include allegations re Bonita Hager and Lawrence Quinlan	Pleadings and Motions Re: Pleadings
8/17/2017	Sarah Colby	0.2	\$950	\$190	Emails between GBW and OC re stipulation on FAC; Draft stipulation; email to and from OC re stip	Pleadings and Motions Re: Pleadings
8/18/2017	Sarah Colby	0.2	\$950	\$190	TC GBW re meeting with class member	Class Outreach and Contact
8/18/2017	Sarah Colby	0.1	\$950	\$95	Emails with Sharon x 3 re class member's issues/family council	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/18/2017	Sarah Colby	0.1	\$950	\$95	TC GBW re stip re FAC and Ds response deadline; email from GBW re same	Pleadings and Motions Re: Pleadings
8/18/2017	Sarah Colby	0.1	\$950	\$95	Email from OC re stip; review stip; send to SG	Pleadings and Motions Re: Pleadings
8/18/2017	Sarah Colby	2.9	\$950	\$2,755	Editing FAC with LQ allegations (includes review of LQ file)	Pleadings and Motions Re: Pleadings
8/18/2017	Sarah Colby	0.1	\$950	\$95	Email LQ allegations to LV for review	Pleadings and Motions Re: Pleadings
8/18/2017	Sarah Colby	1.2	\$950	\$1,140	Editing FAC; review/edit GAL declarations	Pleadings and Motions Re: Pleadings
8/21/2017	Jennifer Bybee	0.1	\$925	\$93	Review emails with co-counsel re FAC, disclosures, etc.	Case Organization, Planning and Strategy
8/21/2017	Sarah Colby	0.2	\$950	\$190	Review communications from class members re problems at BSF	Case Organization, Planning and Strategy
8/21/2017	Sarah Colby	0.5	\$950	\$475	Prep for meeting with Eva Becker	Case Organization, Planning and Strategy
8/21/2017	Sarah Colby	0.1	\$950	\$95	review co from class members re ongonig problems at B Fountaingrove	Case Organization, Planning and Strategy
8/21/2017	Sarah Colby	1.0	\$950	\$950	Review Eva Becker records	Class Outreach and Contact
8/21/2017	Sarah Colby	0.4	\$950	\$380	Review/prepare file and retainers for meeting with clients	Class Outreach and Contact
8/21/2017	Sarah Colby	0.1	\$950	\$95	Emails from coco re edits to FAC	Pleadings and Motions Re: Pleadings
8/21/2017	Sarah Colby	1.2	\$950	\$1,140	Draft declaration of Loresia Vallette for GAL appointment; emails to Loresia re POA and declaration	Pleadings and Motions Re: Pleadings
8/21/2017	Sarah Colby	0.2	\$950	\$190	Edits to FAC	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/21/2017	Sarah Colby	0.1	\$950	\$95	Emails with Sharon re Karg; LM Karg	Pleadings and Motions Re: Pleadings
8/21/2017	Sarah Colby	1.7	\$950	\$1,615	Editing complaint; CW GBW re same	Pleadings and Motions Re: Pleadings
8/22/2017	Guy Wallace	5.5	\$1,350	\$7,425	travel from East Bay to San Luis Obispo / Los Osos for meeting with Beckers re potential plaintiff and class representative	Pleadings and Motions Re: Pleadings
8/22/2017	Guy Wallace	3.8	\$1,350	\$5,130	meeting with Beckers re potential plaintiff and class representative; com's with SC re same and analysis of potential allegations (.5)	Pleadings and Motions Re: Pleadings
8/22/2017	Jennifer Bybee	0.8	\$925	\$740	Review PRA request response from San Ramon Fire Department; email co-counsel re same; email to EPG re billing re same	Discovery (Non-Deposition)
8/22/2017	Sarah Colby	7.5	\$950	\$7,125	Meeting with PNC/class member Eva Becker (includes travel to Morro Bay)	Class Outreach and Contact
8/22/2017	Sarah Colby	0.5	\$950	\$475	CW GBW re drafting FAC/new class reps/possible arguments in MTD and how to oppose	Pleadings and Motions Re: Pleadings
8/23/2017	Guy Wallace	5.5	\$1,350	\$7,425	travel from San Luis Obispo to East Bay & com's with SC re preparation of FAC (.6)	Pleadings and Motions Re: Pleadings
8/23/2017	Jennifer Bybee	0.2	\$925	\$185	Phone call to Admin Assistant at Orange County Fire re PRA request	Discovery (Non-Deposition)
8/23/2017	Sarah Colby	4.0	\$950	\$3,800	Return from meeting with class member/potential class rep	Class Outreach and Contact
8/24/2017	Guy Wallace	1.4	\$1,350	\$1,890	review and analysis of draft of FAC; allegations re Eva Becker; issues re Thomas Becker's power of attorney on behalf of his mother; com's with SC re same (.3)	Pleadings and Motions Re: Pleadings
8/24/2017	Guy Wallace	0.5	\$1,350	\$675	com's with co-counsel re potential addition of plaintiff and putative class representative Eva Becker	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/24/2017	Jennifer Bybee	0.2	\$925	\$185	Email to GBW and SSC re PRA request to Orange County Fire	Discovery (Non-Deposition)
8/24/2017	Sarah Colby	0.1	\$950	\$95	Email from and to Sharon re potential class rep/ED/meeting with OC	Case Organization, Planning and Strategy
8/24/2017	Sarah Colby	0.1	\$950	\$95	Email from and to JAU re PRA request Orange County Fire Department	Case Organization, Planning and Strategy
8/24/2017	Sarah Colby	2.9	\$950	\$2,755	Draft/edit FAC, includes review of Hager notes/file and Becker file	Pleadings and Motions Re: Pleadings
8/25/2017	Guy Wallace	2.4	\$1,350	\$3,240	review and analysis of and revise and edit FAC; P's administrative motion for appointment of guardian ad litem; com's with SC re same (.4)	Pleadings and Motions Re: Pleadings
8/25/2017	Sarah Colby	4.1	\$950	\$3,895	Incorporate edits to and review FAC; CW GBW x 2 re same; emails with coco re same	Pleadings and Motions Re: Pleadings
8/25/2017	Sarah Colby	1.0	\$950	\$950	draft/edit Application for GAL and proposed order; cw Vallette re same	Pleadings and Motions Re: Pleadings
8/25/2017	Sarah Colby	0.6	\$950	\$570	Finalizing FAC and GAL application docs for filing	Pleadings and Motions Re: Pleadings
8/28/2017	Jennifer Bybee	0.7	\$925	\$648	Review PRA request responses from Westminster PD; email co-counsel re PRA request responses from Westminster PD and Orange County Fire	Discovery (Non-Deposition)
8/28/2017	Jennifer Bybee	0.5	\$925	\$463	Draft PRA requests to Oceanside Police Department and Oceanside Fire Department; create producteev re mailing of same	Discovery (Non-Deposition)
8/29/2017	Sarah Colby	0.1	\$950	\$95	TC KK re potential experts and meeting	Experts (Including Retention)
8/30/2017	Sarah Colby	0.1	\$950	\$95	VM from sharon about potential witness; email to Sharon and Chris re same and FAC	Case Organization, Planning and Strategy
8/30/2017	Sarah Colby	0.1	\$950	\$95	VM x 2 from potential witnesses/current residents	Case Organization, Planning and Strategy
8/31/2017	Sarah Colby	0.2	\$950	\$190	TCW daughter of class member with questions about the claims	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/31/2017	Sarah Colby	0.3	\$950	\$285	Review witness interview and meeting notes and draft memo re plan	Case Organization, Planning and Strategy
8/31/2017	Sarah Colby	1.2	\$950	\$1,140	TC Sharon re staffing update/witnesses/survey/response to FC questions	Case Organization, Planning and Strategy
8/31/2017	Sarah Colby	0.1	\$950	\$95	Emails from CH and KK re communications from class members; respond to emails	Case Organization, Planning and Strategy
8/31/2017	Sarah Colby	0.3	\$950	\$285	Research on issues of commonality in multiple facility cases	Class Certification
8/31/2017	Sarah Colby	0.3	\$950	\$285	TC family member/B Santa Rosa; email to co-counsel re conversation	Class Outreach and Contact
9/5/2017	Sarah Colby	0.9	\$950	\$855	research on potential staffing experts	Experts (Including Retention)
9/6/2017	Jennifer Bybee	0.1	\$925	\$93	Com's with SSC and K. Knapp re rescheduling meeting re experts	Case Organization, Planning and Strategy
9/6/2017	Sarah Colby	0.4	\$950	\$380	TC Sharon re Brookdale survey; email co-co re same	Case Organization, Planning and Strategy
9/6/2017	Sarah Colby	0.1	\$950	\$95	TC KK re staffing expert search	Experts (Including Retention)
9/7/2017	Jennifer Bybee	0.2	\$925	\$185	Review email com's between co-counsel re Brookdale survey; review Brookdale survey	Case Organization, Planning and Strategy
9/8/2017	Sarah Colby	0.9	\$950	\$855	TC Sharon re additional issues at facility/possible witnesses	Case Organization, Planning and Strategy
9/8/2017	Sarah Colby	0.9	\$950	\$855	Research on Brookdale management employees	Case Organization, Planning and Strategy
9/8/2017	Sarah Colby	0.2	\$950	\$190	TC GG re initial disclosures/letter to OC/plan for response	Case Organization, Planning and Strategy
9/8/2017	Sarah Colby	0.2	\$950	\$190	CW GBW x 2 re changes at BSR/CW GG	Case Organization, Planning and Strategy
9/8/2017	Sarah Colby	1.8	\$950	\$1,710	Legal research on multi-facility/standing and class cert	Class Certification
9/10/2017	Jennifer Bybee	0.8	\$925	\$740	Review documents shared by K. Knapp re potential ways expert could calculate care minutes for ADLs	Misc. Research

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/10/2017	Sarah Colby	0.3	\$950	\$285	TC Sharon re Brookdale surveys	Case Organization, Planning and Strategy
9/11/2017	Jennifer Bybee	2.1	\$925	\$1,943	Meeting with SSC and K. Knapp re expert witnesses, Brookdale surveys, and class member declarations	Case Organization, Planning and Strategy
9/11/2017	Sarah Colby	0.1	\$950	\$95	CW JAU re class cert declarations and expert research	Class Certification
9/11/2017	Sarah Colby	2.1	\$950	\$1,995	Meeting w/ KK/JAU re expert development/class cert declarations	Experts (Including Retention)
9/11/2017	Sarah Colby	0.1	\$950	\$95	Email to Charlene Harrington re RCFE staffing expert suggestions	Experts (Including Retention)
9/12/2017	Sarah Colby	0.4	\$950	\$380	TC Debra Jones, POA for EB, re Eva's condition and wishes	Class Outreach and Contact
9/12/2017	Sarah Colby	0.5	\$950	\$475	TC Joan Broadhurst re EB's status and wishes	Class Outreach and Contact
9/12/2017	Sarah Colby	0.1	\$950	\$95	TC GBW re cw EB attorney and POA	Class Outreach and Contact
9/12/2017	Sarah Colby	0.1	\$950	\$95	TC again with DEbra JONES re EB's wishes	Class Outreach and Contact
9/12/2017	Sarah Colby	0.7	\$950	\$665	Review client docs for initial disclosure prep	Discovery (Non-Deposition)
9/12/2017	Sarah Colby	0.1	\$950	\$95	Email from Charlene HArrington re RCFE staffing expert, emails with KK/JAU re same	Experts (Including Retention)
9/13/2017	Jennifer Bybee	0.3	\$925	\$278	Com's with GBW and SSC re experts and class member declarations	Case Organization, Planning and Strategy
9/13/2017	Sarah Colby	0.3	\$950	\$285	Review notes from meetings with co-counsel and class members; memo to self re next steps	Case Organization, Planning and Strategy
9/13/2017	Sarah Colby	0.1	\$950	\$95	mf and email to Sharon re meeting with ex-employee	Case Organization, Planning and Strategy
9/13/2017	Sarah Colby	0.1	\$950	\$95	Emails w/ co-counsel re Kaiser article and potential witnesses	Case Organization, Planning and Strategy
9/13/2017	Sarah Colby	0.1	\$950	\$95	TC GBW re Kaiser article and potential witnesses	Case Organization, Planning and Strategy
9/13/2017	Sarah Colby	0.3	\$950	\$285	CW JAU/GBW re class declarations/outreach/experts	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/13/2017	Sarah Colby	0.2	\$950	\$190	email and letter from and email to Debra Jones re class member's participation in lawsuit	Class Outreach and Contact
9/13/2017	Sarah Colby	0.7	\$950	\$665	Review articles re staffing and quality of care--search for expert	Experts (Including Retention)
9/14/2017	Jennifer Bybee	0.1	\$925	\$93	Email to SSC and K. Knapp enclosing GBW memo re class cert and re class member declarations	Case Organization, Planning and Strategy
9/14/2017	Sarah Colby	0.4	\$950	\$380	LR on class member declarations and when they are disclosed; emails with co-co re same.	Class Certification
9/14/2017	Sarah Colby	0.1	\$950	\$95	Review memo re blind class member; email co-co re same	Class Outreach and Contact
9/14/2017	Sarah Colby	0.5	\$950	\$475	cw gbw re door issue; review regs and TAM; draft letter to OC re door	Communications With Opposing Counsel
9/14/2017	Sarah Colby	0.4	\$950	\$380	Review docs from clients for initial disclosures	Discovery (Non-Deposition)
9/14/2017	Sarah Colby	1.1	\$950	\$1,045	research Melanie Harrington as possible expert; email MH re meeting/conversation re case	Experts (Including Retention)
9/15/2017	Guy Wallace	0.4	\$1,350	\$540	com's with GG and reporter re newspaper story for Riverside area publication	Case Organization, Planning and Strategy
9/15/2017	Guy Wallace	0.3	\$1,350	\$405	com's with SC re potential class representatives	Case Organization, Planning and Strategy
9/15/2017	Guy Wallace	0.3	\$1,350	\$405	com's with Waters re site inspections	Discovery (Non-Deposition)
9/15/2017	Jennifer Bybee	0.1	\$925	\$93	Review response to PRA request from Oceanside police department	Discovery (Non-Deposition)
9/15/2017	Sarah Colby	1.0	\$950	\$950	TC Sharon re updates re BSR/class reps	Case Organization, Planning and Strategy
9/15/2017	Sarah Colby	0.1	\$950	\$95	Emails with KK re potential consultant/expert on staffing	Experts (Including Retention)
9/18/2017	Jennifer Bybee	0.1	\$925	\$93	Review email responses forwarded by K. Knapp re defending experts at imperfect institutions	Case Organization, Planning and Strategy
9/18/2017	Sarah Colby	2.8	\$950	\$2,660	Meeting with ex-employee from BSR (includes travel to and from Danville)	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/18/2017	Sarah Colby	0.6	\$950	\$570	TC Sharon Eidler re updates on staffing and class members	Class Certification
9/18/2017	Sarah Colby	0.2	\$950	\$190	Review photos of Hager room/housekeeping/staffing issues	Class Certification
9/18/2017	Sarah Colby	0.1	\$950	\$95	Emails from class members in response to newspaper articles; emails with co-co re same	Class Outreach and Contact
9/18/2017	Sarah Colby	0.1	\$950	\$95	Emails with KK/JAU re experts/email with potential expert	Experts (Including Retention)
9/19/2017	Guy Wallace	2.2	\$1,350	\$2,970	review and analysis of drafting of topics and points for class cert declarations from putative class members; com's with GG; KJK; SC re same (.4)	Class Certification
9/19/2017	Jennifer Bybee	0.3	\$925	\$278	Email to K. Knapp re class member declarations; review and email K. Knapp past class member declarations from access cases	Class Outreach and Contact
9/19/2017	Jennifer Bybee	0.2	\$925	\$185	Review email com's from deceased class member's family re conditions at Brookdale; review emails from co-counsel re com's with class members	Class Outreach and Contact
9/19/2017	Sarah Colby	0.2	\$950	\$190	Review article re FAC; emails to class reps re same	Case Organization, Planning and Strategy
9/19/2017	Sarah Colby	0.1	\$950	\$95	TC Rita Stiner re meeting with her and Stacy	Class Certification
9/19/2017	Sarah Colby	0.1	\$950	\$95	Emails with co-co re class certification declarations	Class Certification
9/19/2017	Sarah Colby	1.0	\$950	\$950	TC KK re class cert declarations from residents/expert search/emergency procedures	Class Certification
9/19/2017	Sarah Colby	0.3	\$950	\$285	TC GBW re class member declarations; review GBW declaration outline	Class Certification
9/19/2017	Sarah Colby	0.2	\$950	\$190	Research on requirements for emergency evacuation/procedures under ADAAG et al	Class Certification
9/19/2017	Sarah Colby	0.2	\$950	\$190	Review staffign evaluation form from CMS	Class Certification
9/19/2017	Sarah Colby	0.1	\$950	\$95	Emails with Sharon re FAC/news articles/meeting with class reps	Class Certification

Date	Initials	Hours	Rate	Amount Description	ProjectName
9/19/2017	Sarah Colby	1.0	\$950	\$950 Review evacuation procedures docs from Lopez	Class Certification
9/19/2017	Sarah Colby	0.3	\$950	\$285 VM x 4 from family members of residents and ex-employees/TC GBW re same	Class Outreach and Contact
9/19/2017	Sarah Colby	0.3	\$950	\$285 TC Carmen Becker re letter from Jones; LM Thomas Becker	Class Outreach and Contact
9/19/2017	Sarah Colby	0.2	\$950	\$190 TC Thomas Becker re Paso Robles/Eva Becker	Class Outreach and Contact
9/19/2017	Sarah Colby	0.2	\$950	\$190 Revise CO to KohSweeney re door opener x 2; email to co-counsel re same	Communications With Opposing Counsel
9/19/2017	Sarah Colby	0.2	\$950	\$190 CW GBW re emergency procedures and expert	Experts (Including Retention)
9/20/2017	Sarah Colby	0.4	\$950	\$380 TC Amanda Raboin re MIL's experience in Ontario facility/class member declaration/getting records	Class Certification
9/20/2017	Sarah Colby	0.8	\$950	\$760 VM from former DSD; TCT former DSD; email to same	Class Certification
9/20/2017	Sarah Colby	0.1	\$950	\$95 VM from class member; LM Class member	Class Outreach and Contact
9/20/2017	Sarah Colby	1.0	\$950	\$950 TC Melanie Harrington re staffing/expert consulting	Experts (Including Retention)
9/20/2017	Sarah Colby	0.3	\$950	\$285 TC KK re potential expert and class declarations	Experts (Including Retention)
9/20/2017	Sarah Colby	0.2	\$950	\$190 CW KK re work for expert; lm melanie harrington	Experts (Including Retention)
9/21/2017	Sarah Colby	1.4	\$950	\$1,330 Research on current management employees; LR re contact with represented parties	Class Certification
9/22/2017	Sarah Colby	2.5	\$950	\$2,375 MEeting with Stacy Stiner re case developments (includes travel to and from Danville)	Case Organization, Planning and Strategy
9/22/2017	Sarah Colby	0.2	\$950	\$190 CW GBW re recent developments at the BSR facility and meeting with class rep	Case Organization, Planning and Strategy
9/22/2017	Sarah Colby	0.3	\$950	\$285 draft email memo re Melanie Harrington to co-co	Experts (Including Retention)
9/22/2017	Sarah Colby	0.1	\$950	\$95 Order granting GAL motions	Pleadings and Motions Re: Pleadings
9/25/2017	Sarah Colby	0.1	\$950	\$95 MF Sharon Eidler re Family Council; email Sharon re same	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/25/2017	Sarah Colby	0.1	\$950	\$95	Emails with co-co re potential expert/class rep's move	Case Organization, Planning and Strategy
9/25/2017	Sarah Colby	0.1	\$950	\$95	TC GBW re Pat Eidler's move	Case Organization, Planning and Strategy
9/25/2017	Sarah Colby	1.1	\$950	\$1,045	TC Sharon Eidler re Pat's move/family council/update on changes at facility	Case Organization, Planning and Strategy
9/25/2017	Sarah Colby	0.7	\$950	\$665	TC Stephanie Calkins re mom's experience at Rancho Mirage facility; prep for call (.1)	Class Certification
9/25/2017	Sarah Colby	0.2	\$950	\$190	Research on former employees of Brookdale	Class Certification
9/25/2017	Sarah Colby	0.3	\$950	\$285	Review materials from Stephanie Calkins (communications with DSS); CO Stephanie re speaking with private caregivers; email to and from SC re ROI	Class Certification
9/25/2017	Sarah Colby	0.1	\$950	\$95	Email from and to LV re ex-employee	Class Certification
9/25/2017	Sarah Colby	0.2	\$950	\$190	Review JD's standing orders re civil cases and civil discovery	Discovery (Non-Deposition)
9/26/2017	Sarah Colby	0.1	\$950	\$95	TC GBW re family council/BSR	Case Organization, Planning and Strategy
9/26/2017	Sarah Colby	0.1	\$950	\$95	Email from S. Calkins re cw sister and home care providers for declaration	Class Certification
9/27/2017	Sarah Colby	0.4	\$950	\$380	TC DRC attorney re IHSS staffing (.3); TC KK re same (.1)	Case Organization, Planning and Strategy
9/27/2017	Sarah Colby	0.1	\$950	\$95	VM from former resident's family member re problems at Brookdale; VM from Sharon re Family Council meeting	Class Certification
9/27/2017	Sarah Colby	0.1	\$950	\$95	Emails from and to S. Calkins re contact with home health agency	Class Outreach and Contact
9/27/2017	Sarah Colby	0.1	\$950	\$95	emails with Melanie Harrington re injunction; emails with KK re same	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/28/2017	Sarah Colby	0.6	\$950	\$570	Review Ds' MTD/MTS/MTC arb; emails with GBW re same	Other Motions
9/29/2017	Guy Wallace	1.5	\$1,350	\$2,025	review and analysis of D's motion to compel arbitration; motion to dismiss; motion to strike class allegations	Pleadings and Motions Re: Pleadings
9/29/2017	Guy Wallace	0.8	\$1,350	\$1,080	com's with GG; CH; KJK; SC; JAU re D's three motions on the pleadings	Pleadings and Motions Re: Pleadings
9/29/2017	Jennifer Bybee	4.4	\$925	\$4,070	Review and analyze Defendants' motion to compel arbitration, motion to dismiss, motion to strike, and request for judicial notice and related documents; misc research re same; com's with GBW and SSC re same	Pleadings and Motions Re: Pleadings
9/29/2017	Sarah Colby	0.1	\$950	\$95	Emails with GBW/JAU re MTD/release in Winans	Other Motions
9/29/2017	Sarah Colby	2.3	\$950	\$2,185	Review D's MTD/MTS/MTC arb	Pleadings and Motions Re: Pleadings
9/30/2017	Sarah Colby	0.3	\$950	\$285	Emails with Sharon re move and resident working front desk; research on resident working for facility	Case Organization, Planning and Strategy
10/1/2017	Guy Wallace	3.8	\$1,350	\$5,130	review and analysis of D's three motions on the pleadings	Pleadings and Motions Re: Pleadings
10/1/2017	Guy Wallace	1.2	\$1,350	\$1,620	com's with SC (.6); JAU (.6) re D's three motions on the pleadings and preparation of responses thereto	Pleadings and Motions Re: Pleadings
10/1/2017	Jennifer Bybee	0.5	\$925	\$463	Com's with GBW re defendant's motion to compel arbitration; motion to dismiss; motion to strike and motion for judicial notice; review motion to compel arbitration in prep for same	Pleadings and Motions Re: Pleadings
10/1/2017	Sarah Colby	0.4	\$950	\$380	CW GBW re D's MTD/MTS/MTC arb and our oppositions	Other Motions
10/2/2017	Guy Wallace	2.2	\$1,350	\$2,970	prepare for and attend mtg w/ GG; Hu; Mauny; KJK; SC; JAU re D's motions on the pleadings	Pleadings and Motions Re: Pleadings
10/2/2017	Guy Wallace	0.2	\$1,350	\$270	com's with KohSweeney re schedule on D's motions on the pleadings	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/2/2017	Jennifer Bybee	1.5	\$925	\$1,388	Meeting with GBW, SSC, K. Knapp, G. Grunfeld, and C. Hu at RBGG re responding to defendants' motions to compel arbitration, dismiss, strike and take judicial notice	Case Organization, Planning and Strategy
10/2/2017	Jennifer Bybee	0.3	\$925	\$278	Com's with GBW and SSC re re oppositions to motions/class member declarations/updates re class reps	Case Organization, Planning and Strategy
10/2/2017	Sarah Colby	0.1	\$950	\$95	Emails with CHu and KK re potential class member declaration	Class Outreach and Contact
10/2/2017	Sarah Colby	2.8	\$950	\$2,660	Meeting with co-counsel re oppositions to MTD/MTC arb/MTS; assigning tasks (includes travel to and from SF to attend--1.3)	Other Motions
10/2/2017	Sarah Colby	0.3	\$950	\$285	CW GBW/JAU re oppositions to motions/class member declarations/updates re class reps	Other Motions
10/2/2017	Sarah Colby	0.1	\$950	\$95	Review email memo from CHu re arbitration research	Other Motions
10/2/2017	Sarah Colby	0.7	\$950	\$665	Review motions in prep for meeting with co-co	Other Motions
10/3/2017	Guy Wallace	0.2	\$1,350	\$270	com's with Defendants re schedule on motions on pleadings and analysis of response re same	Pleadings and Motions Re: Pleadings
10/3/2017	Guy Wallace	1.1	\$1,350	\$1,485	legal research and analysis re D's motion to strike class allegations	Pleadings and Motions Re: Pleadings
10/3/2017	Jennifer Bybee	0.2	\$925	\$185	Review email com's from co-counsel re issues with Fountaingrove and research re responses to Defendants' motions to compel arbitration, dismiss, strike and take judicial notice	Case Organization, Planning and Strategy
10/3/2017	Sarah Colby	2.4	\$950	\$2,280	Review CHu and LR on ADA application to ALFs	Other Motions
10/4/2017	Guy Wallace	0.3	\$1,350	\$405	com's with OC re schedule on D's three motions on the pleadings	Pleadings and Motions Re: Pleadings
10/4/2017	Guy Wallace	0.7	\$1,350	\$945	legal research and analysis re ADA Title III regulations and 2010 ADA Standards re coverage of assisted living facilities; com's with SC re same (.2)	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/4/2017	Sarah Colby	0.1	\$950	\$95	Email to CHu and KK re getting declaration from BSR resident	Class Outreach and Contact
10/4/2017	Sarah Colby	0.1	\$950	\$95	Email to Melanie Harrington re retention	Experts (Including Retention)
10/4/2017	Sarah Colby	0.1	\$950	\$95	Email with CHu re relationship between MG/E/BD in analyzing MTC arbitration based on agreements with MG/E.	Other Motions
10/4/2017	Sarah Colby	0.6	\$950	\$570	Review of pleadings re arbitration in other RCFE cases; email to co-co summarizing same	Other Motions
10/4/2017	Sarah Colby	0.2	\$950	\$190	Emails from and to Eidlrs re MTD/MTC Arb/MTS	Pleadings and Motions Re: Pleadings
10/4/2017	Sarah Colby	0.1	\$950	\$95	CW GBW and discussing motions with Eidlrs	Pleadings and Motions Re: Pleadings
10/4/2017	Sarah Colby	0.9	\$950	\$855	TC Sharon re MTD/MTS/MTC arb; updates from residents/family members and getting declarations; FC meeting	Pleadings and Motions Re: Pleadings
10/4/2017	Sarah Colby	0.4	\$950	\$380	Legal research on arbitration and successors	Pleadings and Motions Re: Pleadings
10/5/2017	Guy Wallace	0.9	\$1,350	\$1,215	tc with consultant re expert issues; com's with SC; KJK re same	Discovery (Non-Deposition)
10/5/2017	Guy Wallace	2.2	\$1,350	\$2,970	review and analysis of D's proposed stipulation and order re schedule on pending motions and GO 56 and initial disclosures; revise and edit same	Pleadings and Motions Re: Pleadings
10/5/2017	Guy Wallace	0.3	\$1,350	\$405	com's with OC re stipulation on schedule	Pleadings and Motions Re: Pleadings
10/5/2017	Guy Wallace	0.5	\$1,350	\$675	com's with co-counsel re stipulation on schedule re pending motions	Pleadings and Motions Re: Pleadings
10/5/2017	Jennifer Bybee	0.3	\$925	\$278	Review email from C. Hu re public accommodations; email from D. Mauney re potential plaintiff; email from SSC re arbitration issue; email from GBW re stipulation	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/5/2017	Sarah Colby	0.1	\$950	\$95	Review document from class member	Case Organization, Planning and Strategy
10/5/2017	Sarah Colby	0.3	\$950	\$285	TC GBW re experts on staffing/theory of case	Case Organization, Planning and Strategy
10/5/2017	Sarah Colby	0.1	\$950	\$95	Emails with MH/GBW/KK re scheduling call to discuss case	Experts (Including Retention)
10/5/2017	Sarah Colby	0.9	\$950	\$855	TC Melanie Harrington about showing inadequate staffing/how to staff adequately	Experts (Including Retention)
10/5/2017	Sarah Colby	0.1	\$950	\$95	Review KK's section for opposition to elder financial abuse MTD; email KK re same	Other Motions
10/5/2017	Sarah Colby	0.2	\$950	\$190	Emails with co-co re stipulation on deadlines for opp and reply to D's motions; review stip	Other Motions
10/5/2017	Sarah Colby	1.3	\$950	\$1,235	Research on "public accommodation" issue	Other Motions
10/6/2017	Guy Wallace	0.5	\$1,350	\$675	com's with APK re filing of stipulation and order re schedule; review and analysis of supporting declaration re same	Pleadings and Motions Re: Pleadings
10/6/2017	Sarah Colby	0.1	\$950	\$95	TC GBW re opp to MTC arb and potential class reps	Other Motions
10/6/2017	Sarah Colby	0.3	\$950	\$285	emails with co-co re potential class reps/arb agreements; review client docs re same	Other Motions
10/9/2017	Jennifer Bybee	0.1	\$925	\$93	Review email com's with co-counsel re fires and facility closures	Case Organization, Planning and Strategy
10/9/2017	Sarah Colby	0.1	\$950	\$95	Emails with co-co re Fountaingrove evacuation/evacuation plans	Case Organization, Planning and Strategy
10/9/2017	Sarah Colby	0.3	\$950	\$285	TC GG re arbitration agreements and research/stipulation/potential class reps	Other Motions
10/9/2017	Sarah Colby	0.1	\$950	\$95	TC KK re opp to MTD	Other Motions
10/9/2017	Sarah Colby	0.1	\$950	\$95	Emails with co-co re Quinlan arb agreement and POAs	Other Motions
10/9/2017	Sarah Colby	1.9	\$950	\$1,805	Review "public accommodation" and "reasonable modification" cases for opps for MTD and MTS	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/10/2017	Guy Wallace	2.6	\$1,350	\$3,510	preparation and drafting of opposition to D's motion to strike	Pleadings and Motions Re: Pleadings
10/10/2017	Jennifer Bybee	0.4	\$925	\$370	Review briefing in past cases re standing in multi-facility cases for drafting portion re same in opposition to Defendant's motion to dismiss	Other Motions
10/10/2017	Sarah Colby	0.2	\$950	\$190	TC Sharon Eidler re potential class reps/records/Fountaingrove residents at BSR; email co-co re same	Case Organization, Planning and Strategy
10/10/2017	Sarah Colby	0.2	\$950	\$190	TC Sharon: update on situation at BSR	Case Organization, Planning and Strategy
10/10/2017	Sarah Colby	0.3	\$950	\$285	TC Debbie Stinson about possible declaration re mom's stay at BSR; email to Jenny Boom re mom's stay	Class Outreach and Contact
10/10/2017	Sarah Colby	0.2	\$950	\$190	TC Janet Woodward re mom's experience at BSR; set up meeting	Class Outreach and Contact
10/10/2017	Sarah Colby	0.1	\$950	\$95	LM for courtroom deputy about stip; email GG re same; TC court re same; email co-co re same	Other Motions
10/10/2017	Sarah Colby	0.2	\$950	\$190	LR arbitration/successors for opp MTC arb; emails to GG re same	Other Motions
10/10/2017	Sarah Colby	0.6	\$950	\$570	Review client file from Brookdale for POA docs for opp to arb motion; review other docs from client re same; email client re same; emails co-co re same	Other Motions
10/10/2017	Sarah Colby	0.2	\$950	\$190	review notes from cw residents/family members for potential declarations; email former resident family member re declaration	Other Motions
10/10/2017	Sarah Colby	0.3	\$950	\$285	LM x 4 class members re declaration potentially for opp; email class members re same; vmf class members x 3	Other Motions
10/10/2017	Sarah Colby	0.1	\$950	\$95	CW GBW re opp to MTD--equitable abstention and public accommodation issue	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/10/2017	Sarah Colby	0.5	\$950	\$475	LR equitable abstention for opp mtd	Other Motions
10/10/2017	Sarah Colby	0.6	\$950	\$570	drafting outline for opp to equitable abstenion argument in MTD	Other Motions
10/11/2017	Guy Wallace	1.1	\$1,350	\$1,485	com's with GG; CH; KJK; SC; JAU re D's motion to dismiss; D's motion to strike; draft of administrative motion re D's motion to compel arbitration and schedule re same	Pleadings and Motions Re: Pleadings
10/11/2017	Guy Wallace	7.8	\$1,350	\$10,530	preparation and drafting of opposition to D's motion to strike class allegations	Pleadings and Motions Re: Pleadings
10/11/2017	Jennifer Bybee	6.1	\$925	\$5,643	Draft and revise standing argument for opposition to defendant's motion to dismiss; review defendant's papers re same; legal research re same; com's with GBW re same; review emails with co-counsel re stip re deadline for same; email same to GBW	Other Motions
10/11/2017	Jennifer Bybee	2.5	\$925	\$2,313	Research re whether Under Applicable Law the Fact That Some (or Many) Class Members Signed Arbitration Agreements Does Not Defeat Class Certification; com's with GBW re same	Other Motions
10/11/2017	Sarah Colby	0.1	\$950	\$95	TC Sharon re family council/meeting with class members	Case Organization, Planning and Strategy
10/11/2017	Sarah Colby	0.1	\$950	\$95	Review co from GG to OC re resident files	Communications With Opposing Counsel
10/11/2017	Sarah Colby	0.3	\$950	\$285	TC KK/GBW re opp to MTD--release section	Other Motions
10/11/2017	Sarah Colby	0.3	\$950	\$285	CW GBW re introduction and statement of facts for opp to MTD	Other Motions
10/11/2017	Sarah Colby	0.2	\$950	\$190	TC GG/GBW re stipulation on filing deadlines/Opps to MTD/MTS and MTC arb	Other Motions
10/11/2017	Sarah Colby	0.6	\$950	\$570	CW GBW x 2 re opp to MTD (abstention/public accommodation/unruh act/discrimination sections)	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/11/2017	Sarah Colby	0.3	\$950	\$285	Research on issue of statements not seen for opp to MTD	Other Motions
10/11/2017	Sarah Colby	4.8	\$950	\$4,560	draft opp to equitable abstention argument on MTD, includes LR	Other Motions
10/11/2017	Sarah Colby	0.4	\$950	\$380	LR Public Accommodations for Opp to MTD	Other Motions
10/11/2017	Sarah Colby	0.2	\$950	\$190	Emails with Co-co and cw GBW re plan for filing if stipulation not signed	Other Motions
10/11/2017	Sarah Colby	0.1	\$950	\$95	TC GBW re MTS and MTD opps	Other Motions
10/11/2017	Sarah Colby	2.8	\$950	\$2,660	Draft opp to abstention arg MTD (includes LR)	Other Motions
10/12/2017	Guy Wallace	1.2	\$1,350	\$1,620	com's with GG; CH; KJK; SC; JAU re oppositions to D's motion to dismiss and D's motion to strike class allegations	Pleadings and Motions Re: Pleadings
10/12/2017	Guy Wallace	10.4	\$1,350	\$14,040	preparation and drafting of opposition to D's motion to strike class allegations	Pleadings and Motions Re: Pleadings
10/12/2017	Jennifer Bybee	1.3	\$925	\$1,203	Email to GBW re results of research re arbitration agreements not defeating class certification	Misc. Research
10/12/2017	Jennifer Bybee	0.1	\$925	\$93	Review reliance portions of opposition drafted by C. Hu and SSC and merged version	Other Motions
10/12/2017	Jennifer Bybee	1.1	\$925	\$1,018	Draft section of opposition to MTS re arbitration agreements don't bar class certification; look up cases Defendant cited in support of MTS; com's with GBW re same	Other Motions
10/12/2017	Sarah Colby	0.1	\$950	\$95	Email from Carl re Bdale facilities and wildfires	Case Organization, Planning and Strategy
10/12/2017	Sarah Colby	0.1	\$950	\$95	VM and email from Sharon re potential declarants	Class Outreach and Contact
10/12/2017	Sarah Colby	0.1	\$950	\$95	review CO from OC re Fountaingrove and client records	Communications With Opposing Counsel
10/12/2017	Sarah Colby	2.4	\$950	\$2,280	Draft/edit equitable abstention section on MTD opp (includes legal research)	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/12/2017	Sarah Colby	0.3	\$950	\$285	TC GBW x 4 re opp to MTD and opp to MTS and plan for filing if stip not signed	Other Motions
10/12/2017	Sarah Colby	0.2	\$950	\$190	Multiple emails with co-co re cw court re stip on extension and plan for filing if extension not granted.	Other Motions
10/12/2017	Sarah Colby	0.9	\$950	\$855	Draft/edit MTD opp re statements not seen; emails with CHu re same	Other Motions
10/12/2017	Sarah Colby	4.9	\$950	\$4,655	Draft/edit opp mtd public accommodations (includes legal research)	Other Motions
10/13/2017	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re opposition to MTD	Other Motions
10/13/2017	Sarah Colby	0.1	\$950	\$95	Email from Alan Evans re declaration	Class Outreach and Contact
10/13/2017	Sarah Colby	0.1	\$950	\$95	TC GBW re plan on editing MTD	Other Motions
10/15/2017	Sarah Colby	0.2	\$950	\$190	TC GBW re meeting with class members/arbitration opp/evacuation and other issues	Case Organization, Planning and Strategy
10/16/2017	Guy Wallace	0.4	\$1,350	\$540	com's with SC re efforts to find potential class representatives with no arbitration agreement; preparation of opposition briefs re pending motions on the pleadings	Pleadings and Motions Re: Pleadings
10/16/2017	Sarah Colby	0.1	\$950	\$95	Email from and to Sharon re meeting	Case Organization, Planning and Strategy
10/16/2017	Sarah Colby	3.0	\$950	\$2,850	Meeting with Janet Woodward re mother's experience at BSR (includes travel time to and from Danville)	Class Outreach and Contact
10/16/2017	Sarah Colby	0.1	\$950	\$95	TC GBW re meetings with class members	Class Outreach and Contact
10/16/2017	Sarah Colby	0.6	\$950	\$570	Review docs and draft outline for meeting with class member's daughter	Class Outreach and Contact
10/17/2017	Guy Wallace	0.4	\$1,350	\$540	com's with SC re D's pending dispositive motions and briefing re same	Pleadings and Motions Re: Pleadings
10/17/2017	Sarah Colby	0.2	\$950	\$190	Review CO from Brookdale Fountaingrove FC president to Brookdale EDs	Case Organization, Planning and Strategy
10/17/2017	Sarah Colby	0.1	\$950	\$95	VMF Brookdale Corona family member; TC KK re contacting same	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/17/2017	Sarah Colby	0.1	\$950	\$95	Email to and from BSR family member; TC GBW re same	Class Outreach and Contact
10/17/2017	Sarah Colby	0.4	\$950	\$380	Review Pat Eidler's file from Brookdale	Discovery (Non-Deposition)
10/17/2017	Sarah Colby	0.1	\$950	\$95	CW EG re retaining Melanie Harrington	Experts (Including Retention)
10/17/2017	Sarah Colby	0.2	\$950	\$190	Emails and text messages with Loresia Vallette re POA; review POA; emails with co-co re same for opp to MTC arb	Other Motions
10/17/2017	Sarah Colby	0.1	\$950	\$95	Review Declaration of Jeffrey Barker supporting MTC arb	Other Motions
10/17/2017	Sarah Colby	0.2	\$950	\$190	TC KK re opp to MTD--release issue	Other Motions
10/17/2017	Sarah Colby	0.2	\$950	\$190	TC GBW re opp MTC arb and MTD/waiver issue	Other Motions
10/18/2017	Guy Wallace	0.7	\$1,350	\$945	legal research and analysis re recent Ninth Circuit decisions re commonality; predominance and overbreadth of class definitions	Pleadings and Motions Re: Pleadings
10/18/2017	Sarah Colby	0.1	\$950	\$95	Email from and to Melanie re staffign research and memos	Experts (Including Retention)
10/19/2017	Sarah Colby	0.8	\$950	\$760	Review Patricia Eidler docs	Case Organization, Planning and Strategy
10/22/2017	Guy Wallace	1.9	\$1,350	\$2,565	legal research and analysis re recent Ninth Circuit class certification decisions re consumer cases and CLRA	Pleadings and Motions Re: Pleadings
10/23/2017	Sarah Colby	0.1	\$950	\$95	Emails with Chris Eidler re residency agreement	Case Organization, Planning and Strategy
10/23/2017	Sarah Colby	0.4	\$950	\$380	TC Chris Eidler re admission agreement	Case Organization, Planning and Strategy
10/23/2017	Sarah Colby	0.1	\$950	\$95	Review memo from DM re Vallejo Hills resident	Class Outreach and Contact
10/25/2017	Guy Wallace	0.8	\$1,350	\$1,080	legal research and analysis re whether a proposed class definition must exclude putative class members who signed valid and enforceable arbitration agreements	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/25/2017	Sarah Colby	0.2	\$950	\$190	Review release section of opp to MTD; cw gbw re same	Other Motions
10/26/2017	Guy Wallace	2.9	\$1,350	\$3,915	legal research and analysis re opposition to D's motion to strike; arguments re overbreadth and certification of ADA claims	Pleadings and Motions Re: Pleadings
10/26/2017	Guy Wallace	1.1	\$1,350	\$1,485	com's with GG; DM; KAS; KJK; SC re D's arguments re arbitration agreements, plaintiffs or potential plaintiffs who did not sign same; Emeritus release and its scope	Pleadings and Motions Re: Pleadings
10/26/2017	Jennifer Bybee	0.1	\$925	\$93	Review email com's between co-counsel re FAA preemption and letter to opposing counsel re filing SAC in prep for today's conference call	Case Organization, Planning and Strategy
10/26/2017	Jennifer Bybee	0.6	\$925	\$555	Conference call with co-counsel re amending complaint, status of Brookdale Fountaingrove, opposition to MTC arbitration, etc.	Case Organization, Planning and Strategy
10/26/2017	Sarah Colby	0.3	\$950	\$285	CW GBW re MTC arb and what needs to be done on opp to MTS/MTD	Other Motions
10/26/2017	Sarah Colby	0.1	\$950	\$95	Emails with co-co re adding reps and LR on MTC arb	Other Motions
10/26/2017	Sarah Colby	0.5	\$950	\$475	TC co-co re additional class reps/args on opp to MTC arb/editing sections to opps to MTS/MTD	Other Motions
10/26/2017	Sarah Colby	0.5	\$950	\$475	Review draft sections for opp to MTD; review standing order for civil cases	Other Motions
10/26/2017	Sarah Colby	0.4	\$950	\$380	TC GBW/KK re opp to MTD release of claims issue	Other Motions
10/26/2017	Sarah Colby	0.2	\$950	\$190	CW GBW re release of claims issue (opp to MTD)	Other Motions
10/26/2017	Sarah Colby	0.1	\$950	\$95	Emails with CH/GG/DM re declarations from Hager and Eidler for opp to MTC arb	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/27/2017	Guy Wallace	2.9	\$1,350	\$3,915	legal research and analysis re issues re proposed class definition; alleged overbreadth of same; issues re class members with potential valid and enforceable arbitration agreements	Pleadings and Motions Re: Pleadings
10/27/2017	Guy Wallace	1.4	\$1,350	\$1,890	preparation of argument re nature of injury to proposed class representations and putative class members re CLRA; ADA; com's with SC; KAS re same (.6)	Pleadings and Motions Re: Pleadings
10/27/2017	Guy Wallace	0.4	\$1,350	\$540	com's with GG re letter to defendants re potential additional plaintiffs	Pleadings and Motions Re: Pleadings
10/27/2017	Sarah Colby	2.4	\$950	\$2,280	Review/edit/organize MTD opp sections	Other Motions
10/28/2017	Guy Wallace	2.4	\$1,350	\$3,240	review and analysis of Defendant's motion to strike class allegations	Pleadings and Motions Re: Pleadings
10/29/2017	Guy Wallace	2.6	\$1,350	\$3,510	legal research and analysis re recent decisions re CLRA and class certification; motions to strike class allegations	Pleadings and Motions Re: Pleadings
10/29/2017	Guy Wallace	2.8	\$1,350	\$3,780	preparation and drafting of opposition to motion to strike class allegations	Pleadings and Motions Re: Pleadings
10/29/2017	Sarah Colby	0.1	\$950	\$95	Emails from and to CH/GG/DM re declarations from class reps on opp to mtc arb	Other Motions
10/30/2017	Guy Wallace	3.3	\$1,350	\$4,455	legal research and analysis re reasonable modification in policy duty under Title III, program access under Title II and class certification decisions re same	Pleadings and Motions Re: Pleadings
10/30/2017	Guy Wallace	3.4	\$1,350	\$4,590	preparation and drafting of opposition to D's motion to strike class allegations	Pleadings and Motions Re: Pleadings
10/30/2017	Sarah Colby	1.4	\$950	\$1,330	TC Sharon Eidler re caregiver witness, status with residents	Case Organization, Planning and Strategy
10/30/2017	Sarah Colby	1.4	\$950	\$1,330	Research Brookdale CCL records re med errors/food issues/staffing	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/30/2017	Sarah Colby	0.1	\$950	\$95	Email co-co re potential meeting with current caregiver	Case Organization, Planning and Strategy
10/30/2017	Sarah Colby	0.8	\$950	\$760	mf Terry Cochimba re mom's stay at Brookdale Sterling Heights (.6) and getting declaration; draft letter to TC	Class Certification
10/30/2017	Sarah Colby	0.1	\$950	\$95	Email plan from Melanie Harrington re staffing issues; email GBW/KK re same	Experts (Including Retention)
10/30/2017	Sarah Colby	0.4	\$950	\$380	CW GBW re opp to MTS/MTC arb/updates on class member status	Other Motions
10/30/2017	Sarah Colby	0.4	\$950	\$380	TC CHu re opp to motion to compel arb unconscionability arg; email CHu and Chris Eidler re setting up a time to talk about same.	Other Motions
10/30/2017	Sarah Colby	0.4	\$950	\$380	Review/edit release of claims section for opp to MTD	Other Motions
10/30/2017	Sarah Colby	0.6	\$950	\$570	Review/edit opp to MTD--factual allegations and abstention sections	Other Motions
10/30/2017	Sarah Colby	0.5	\$950	\$475	Editing opp to MTD--public accommodation section	Other Motions
10/31/2017	Guy Wallace	0.9	\$1,350	\$1,215	legal research and analysis re class certification decisions under ADA re reasonable modification in policy; multi-facility cases; damages	Pleadings and Motions Re: Pleadings
10/31/2017	Guy Wallace	2.4	\$1,350	\$3,240	preparation and drafting of section re Plaintiffs' claims under the ADA and the Unruh Act	Pleadings and Motions Re: Pleadings
10/31/2017	Guy Wallace	2.2	\$1,350	\$2,970	preparation and drafting of statement of facts re opposition to motion to strike class allegations	Pleadings and Motions Re: Pleadings
10/31/2017	Guy Wallace	3.2	\$1,350	\$4,320	preparation and drafting of opposition to D's motion to strike class allegations; statement of facts and legal standard re MTS class allegations; legal research and analysis re recent decisions re same	Pleadings and Motions Re: Pleadings
10/31/2017	Jennifer Bybee	0.1	\$925	\$93	Email com's with SSC re standing section and work on oppositions	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/31/2017	Jennifer Bybee	0.6	\$925	\$555	Edit statement of facts in opposition to MTS class allegations; review intro for same; com's with GBW re same; cite check same	Other Motions
10/31/2017	Sarah Colby	0.1	\$950	\$95	Emails with GBW/KK re requesting reasonable modification/notice letter and Stacy's room.	Case Organization, Planning and Strategy
10/31/2017	Sarah Colby	0.1	\$950	\$95	review article re Brookdale evacuation and wildfires	Case Organization, Planning and Strategy
10/31/2017	Sarah Colby	0.1	\$950	\$95	Email from and to DM re class member/arbitration agreement	Class Outreach and Contact
10/31/2017	Sarah Colby	0.1	\$950	\$95	Emails from and to Daughter of ex-resident re requesting records	Class Outreach and Contact
10/31/2017	Sarah Colby	0.3	\$950	\$285	Legal research on public accommodations issue for MTD opp	Other Motions
10/31/2017	Sarah Colby	2.1	\$950	\$1,995	Draft/edit opp to MTD public accommodation section; includes research	Other Motions
10/31/2017	Sarah Colby	0.5	\$950	\$475	Review/Edit standing section for opp to MTD; email co-co re same	Other Motions
10/31/2017	Sarah Colby	0.5	\$950	\$475	Edit discrimination section in opp to MTD; email co-co re same	Other Motions
10/31/2017	Sarah Colby	0.6	\$950	\$570	review edits to and further Edit abstention argument; email co-co re same	Other Motions
11/1/2017	Guy Wallace	6.8	\$1,350	\$9,180	preparation and drafting of opposition to D's motion to strike class allegations; sections re ADA, CLRA	Pleadings and Motions Re: Pleadings
11/1/2017	Guy Wallace	3.7	\$1,350	\$4,995	preparation and drafting of section re ADA claims and class certification	Pleadings and Motions Re: Pleadings
11/1/2017	Jennifer Bybee	0.3	\$925	\$278	Com's with SSC re oppositions to MTS, MTD	Other Motions
11/1/2017	Jennifer Bybee	2.9	\$925	\$2,683	Edit and revise statement of facts section of opposition to MTS; cite check same; fill in missing cites in same; email same to GBW	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/1/2017	Jennifer Bybee	1.0	\$925	\$925	Edit and revise opposition to MTD; email same to SSC	Other Motions
11/1/2017	Sarah Colby	0.1	\$950	\$95	CW GBW re opps to MTD/MTC arb and MTS	Other Motions
11/1/2017	Sarah Colby	3.3	\$950	\$3,135	Editing/drafting opp to MTD	Other Motions
11/1/2017	Sarah Colby	0.5	\$950	\$475	Opp on MTD: Edit factual allegations section and review standing order with briefing in mind; email JAU/GBW/KK re same	Other Motions
11/1/2017	Sarah Colby	2.0	\$950	\$1,900	LR on reasonable modification/class cert in Title III cases for opp to MTS; CW GBW re same	Other Motions
11/1/2017	Sarah Colby	0.1	\$950	\$95	Email from CHu re declarations for opp MTC arb; TC GBW re same	Other Motions
11/1/2017	Sarah Colby	0.1	\$950	\$95	CW JAU re opp to MTS and standing section of MTD app	Other Motions
11/1/2017	Sarah Colby	0.3	\$950	\$285	LR on harm for CLRA claims for opp to MTS	Other Motions
11/2/2017	Guy Wallace	3.7	\$1,350	\$4,995	preparation and drafting of opposition to D's motion to strike class allegations; com's with JAU re same (.5)	Pleadings and Motions Re: Pleadings
11/2/2017	Guy Wallace	5.8	\$1,350	\$7,830	preparation and drafting of oppositions to D's motions to dismiss and/or strike allegations; com's with GG; SC; JAU re same (.9)	Pleadings and Motions Re: Pleadings
11/2/2017	Jennifer Bybee	0.6	\$925	\$555	Research re commonality construed permissively	Other Motions
11/2/2017	Jennifer Bybee	3.3	\$925	\$3,053	Research re CLRA claims ideal for class cert for opposition to MTS; research re uniform misrepresentations yield common questions and common answers for opposition to MTS; com's with GBW re same; email GBW results of same	Other Motions
11/2/2017	Jennifer Bybee	2.5	\$925	\$2,313	Research common forms of proof in CLRA cases for opposition to MTD; email same to GBW	Other Motions
11/2/2017	Sarah Colby	0.5	\$950	\$475	TC Sharon Eidler re cw caregiver/policies/training	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/2/2017	Sarah Colby	2.7	\$950	\$2,565	Meeting with Stacia Stiner and with Bonita Hager (with CHu) (includes travel time to and from facility) to discuss issues related to opp to MTC arb and class cert	Other Motions
11/2/2017	Sarah Colby	1.5	\$950	\$1,425	Draft memo on LR re class cert of Title III reasonable modification claim for GBW	Other Motions
11/2/2017	Sarah Colby	0.7	\$950	\$665	CW GBW re elder financial abuse allegations and issue of who pays for opp to MTS class claims; review statute and case law	Other Motions
11/2/2017	Sarah Colby	0.3	\$950	\$285	CW GBW re possible declarations for MTC arb and release of claims amendment	Other Motions
11/2/2017	Sarah Colby	0.9	\$950	\$855	Draft introduction and Legal Standard for opp MTD; review other sections	Other Motions
11/2/2017	Sarah Colby	0.3	\$950	\$285	CW GBW re arguments on opp to MTS and release and arb issues	Other Motions
11/2/2017	Sarah Colby	0.2	\$950	\$190	Review Lytle declaration; cw gbw re same; email GG et al re same	Other Motions
11/3/2017	Guy Wallace	3.4	\$1,350	\$4,590	preparation and drafting of opposition to D's motion to strike class allegations	Pleadings and Motions Re: Pleadings
11/3/2017	Guy Wallace	4.6	\$1,350	\$6,210	review and analysis of drafts of oppositions to D's three pending motions on the pleadings; revise and edit same; com's with SC re same (.7)	Pleadings and Motions Re: Pleadings
11/3/2017	Guy Wallace	1.1	\$1,350	\$1,485	legal research and analysis re recent class cert decisions under ADA re policy and practice of denying accommodations	Pleadings and Motions Re: Pleadings
11/3/2017	Guy Wallace	1.2	\$1,350	\$1,620	review and analysis of D's 12(b)(6) motion	Pleadings and Motions Re: Pleadings
11/3/2017	Jennifer Bybee	1.3	\$925	\$1,203	Edit and revise opposition to MTS; email same to GBW and SSC	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/3/2017	Jennifer Bybee	1.5	\$925	\$1,388	Research whether damages model must be alleged at pleading stage; email results of same to GBW and SSC	Other Motions
11/3/2017	Jennifer Bybee	0.2	\$925	\$185	Com's with SSC re opposition to MTS	Other Motions
11/3/2017	Sarah Colby	0.3	\$950	\$285	TC SHaron re other class members and declarations	Class Outreach and Contact
11/3/2017	Sarah Colby	0.1	\$950	\$95	emails with Terry Kociemba re mother records and call	Class Outreach and Contact
11/3/2017	Sarah Colby	0.4	\$950	\$380	TC DM re declarations for opp to MTC arb (.2); TC GBW re same (.2)	Other Motions
11/3/2017	Sarah Colby	0.3	\$950	\$285	Draft Vallette Decl. for opp to mtc arb; includes review of docs	Other Motions
11/3/2017	Sarah Colby	2.7	\$950	\$2,565	Review/edit opp to MTS; cw gbw re same	Other Motions
11/3/2017	Sarah Colby	1.1	\$950	\$1,045	Review edits/changes to opps to MTD and MTS with GBW	Other Motions
11/3/2017	Sarah Colby	1.4	\$950	\$1,330	Edit opp to MTD FAC	Other Motions
11/4/2017	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of P's draft opposition to D's MCA; revise and edit same	Pleadings and Motions Re: Pleadings
11/4/2017	Guy Wallace	3.1	\$1,350	\$4,185	review and analysis of draft opposition to D's MCA; revise and edit same; com's with SC; DM re same (.5)	Pleadings and Motions Re: Pleadings
11/4/2017	Sarah Colby	0.5	\$950	\$475	TC GBW re arguments in opps to MTS/MTC arb regarding Emeritus/MG residents (.3); emails with co-co re same	Other Motions
11/5/2017	Sarah Colby	1.1	\$950	\$1,045	Review/edit opp to MTC arb	Other Motions
11/6/2017	Guy Wallace	6.7	\$1,350	\$9,045	revise and edit opposition to motion to strike class allegations; com's with GG; SC re same (.4)	Pleadings and Motions Re: Pleadings
11/6/2017	Sarah Colby	0.1	\$950	\$95	Emails with co-co re Harrington tasks; email MH re same	Experts (Including Retention)
11/6/2017	Sarah Colby	0.3	\$950	\$285	TC GG/DM re opp to MTC arb edits	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/6/2017	Sarah Colby	0.2	\$950	\$190	Review BH contract docs and send to RBGG for opp to MTC arb	Other Motions
11/6/2017	Sarah Colby	0.3	\$950	\$285	Review proposed order, filing checklist, and declaration of GG for opp to MTC arb;	Other Motions
11/6/2017	Sarah Colby	1.5	\$950	\$1,425	Edit opp to MTD FAC	Other Motions
11/7/2017	Guy Wallace	2.1	\$1,350	\$2,835	revise and edit oppositions to D's motions to strike class allegations and to compel arbitration	Pleadings and Motions Re: Pleadings
11/7/2017	Guy Wallace	2.9	\$1,350	\$3,915	revise and edit further draft of P.'s opposition to D.'s 12(b)(6) motion; com's with SC re same (.2)	Pleadings and Motions Re: Pleadings
11/7/2017	Guy Wallace	2.8	\$1,350	\$3,780	review and analysis of P.'s draft opposition to D.'s 12(b)(6) motion; revise and edit same and com's with SC re same (.6)	Pleadings and Motions Re: Pleadings
11/7/2017	Sarah Colby	0.4	\$950	\$380	Review DSS records for Brookdale facilities	Case Organization, Planning and Strategy
11/7/2017	Sarah Colby	0.5	\$950	\$475	TC Sharon Eidler re other class members and their involvement	Class Outreach and Contact
11/7/2017	Sarah Colby	1.1	\$950	\$1,045	Review/edit MTD opp with GBW (.7); make additional edits to opp	Other Motions
11/7/2017	Sarah Colby	0.1	\$950	\$95	CW GBW re released claims; email GG re same	Other Motions
11/7/2017	Sarah Colby	0.8	\$950	\$760	Further drafting on app to mtd	Other Motions
11/7/2017	Sarah Colby	0.1	\$950	\$95	Emails with GBW re further edits to opps to MTD and MTC	Other Motions
11/8/2017	Guy Wallace	7.6	\$1,350	\$10,260	revise and edit oppositions to D's three dispositive motions on the pleadings; com's with SC re same (.5)	Pleadings and Motions Re: Pleadings
11/8/2017	Guy Wallace	0.9	\$1,350	\$1,215	legal research and analysis re J. Donato decisions re motions to strike class allegations; preparation of proposed Order denying D's motion	Pleadings and Motions Re: Pleadings
11/8/2017	Sarah Colby	0.5	\$950	\$475	TC GBW x 5 re changes to opps to MTS and MTD	Other Motions
11/8/2017	Sarah Colby	0.1	\$950	\$95	Emails from and to co-co re opps to MTD/MTS/MTC arb	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/9/2017	Guy Wallace	7.2	\$1,350	\$9,720	revise and edit oppositions to D's motions to dismiss & to strike class allegations; com's with SC re same (.8)	Pleadings and Motions Re: Pleadings
11/9/2017	Sarah Colby	0.1	\$950	\$95	CW GBW re CLRA injunctive standing issue for opp to MTS class allegations	Other Motions
11/9/2017	Sarah Colby	1.4	\$950	\$1,330	Draft/edit proposed order denying D's MTD; cw gbw re same	Other Motions
11/9/2017	Sarah Colby	5.6	\$950	\$5,320	final edits, read-through and cite-check opp to MTD and proposed order to prepare for filing; various cw SG and GBW re same	Other Motions
11/10/2017	Sarah Colby	0.1	\$950	\$95	VM x 2 from Sharon re class members and witness	Case Organization, Planning and Strategy
11/13/2017	Guy Wallace	1.4	\$1,350	\$1,890	analysis of potential forms of common proof re understaffing; D's centralization and standardization of operations	Class Certification
11/13/2017	Sarah Colby	0.1	\$950	\$95	VM Brookdale Scotts Valley facility; emails with daughter of ex-resident of Brookdale Sterling Court facility.	Class Outreach and Contact
11/14/2017	Guy Wallace	1.6	\$1,350	\$2,160	legal research and analysis re recent decisions re predominance; damages models; and class certification	Class Certification
11/14/2017	Sarah Colby	1.7	\$950	\$1,615	Review DSS records/prep for class cert	Case Organization, Planning and Strategy
11/16/2017	Guy Wallace	1.6	\$1,350	\$2,160	prepare for and attend meeting with Harrington; GG; KJK; SC re discovery for class certification, staffing issues	Discovery (Non-Deposition)
11/16/2017	Guy Wallace	0.2	\$1,350	\$270	revise and edit letter to Brookdale re Stiner's access barriers	Discovery (Non-Deposition)
11/16/2017	Sarah Colby	0.6	\$950	\$570	TC Sharon re developments at BSR and class members' complaints	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/16/2017	Sarah Colby	0.2	\$950	\$190	CW GG/GBW/KK re class reps/class outreach/letter re rooms	Case Organization, Planning and Strategy
11/16/2017	Sarah Colby	0.5	\$950	\$475	Draft letter to Cull from Stiner re room	Case Organization, Planning and Strategy
11/16/2017	Sarah Colby	1.8	\$950	\$1,710	Meeting with Melanie Harrington/GBW/KK/GG to discuss discovery/staffing theories/DSS files/witnesses	Experts (Including Retention)
11/17/2017	Sarah Colby	0.1	\$950	\$95	Emails from Sharon re potential class rep	Class Outreach and Contact
11/18/2017	Sarah Colby	0.3	\$950	\$285	CW Melanie Harrington x 2 re staffing studies; communicating with potential expert	Experts (Including Retention)
11/18/2017	Sarah Colby	0.2	\$950	\$190	CW Prescott and GBW/KK re elder financial abuse issue re source of payment	Pleadings and Motions Re: Pleadings
11/19/2017	Sarah Colby	0.1	\$950	\$95	Review edits to letter to BSR ED re Stiner; email co-co re same	Communications With Opposing Counsel
11/20/2017	Sarah Colby	0.9	\$950	\$855	Review citations/deficiencies for Brookdale facilities	Case Organization, Planning and Strategy
11/20/2017	Sarah Colby	0.2	\$950	\$190	TC GBW re staffing theories and class cert	Class Certification
11/20/2017	Sarah Colby	0.1	\$950	\$95	Respond to email from former Brookdale Magnolia resident	Class Outreach and Contact
11/20/2017	Sarah Colby	0.1	\$950	\$95	Email from and to C Hu re letter re Stiner's room	Communications With Opposing Counsel
11/20/2017	Sarah Colby	0.2	\$950	\$190	Emails from and to co-counsel re amending complaint/memory care issues	Pleadings and Motions Re: Pleadings
11/21/2017	Guy Wallace	0.4	\$1,350	\$540	review and analysis of Schnelle study re time needed to assist elderly	Experts (Including Retention)
11/21/2017	Sarah Colby	0.7	\$950	\$665	Review Schnelle article re staffing to acuity; email to co-co re same	Class Certification
11/21/2017	Sarah Colby	0.1	\$950	\$95	Emails with daughter of former Bdale resident	Class Outreach and Contact
11/22/2017	Sarah Colby	0.1	\$950	\$95	MF/LM son of former Brookdale resident	Class Outreach and Contact
11/22/2017	Sarah Colby	0.5	\$950	\$475	TC class member at Bdale Chatsworth; email to same	Class Outreach and Contact
11/22/2017	Sarah Colby	0.5	\$950	\$475	TC son of former Brookdale Uplands resident	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/22/2017	Sarah Colby	0.7	\$950	\$665	Research on former ED, review docs to send to MH; emails to MH re same	Experts (Including Retention)
11/26/2017	Sarah Colby	0.4	\$950	\$380	Research on staffing to acuity models for class cert motion/email to KK re same	Class Certification
11/27/2017	Sarah Colby	0.1	\$950	\$95	EMail from and to GG re Stiner letter	Case Organization, Planning and Strategy
11/28/2017	Sarah Colby	1.8	\$950	\$1,710	Review DSS records for class cert	Class Certification
11/28/2017	Sarah Colby	0.2	\$950	\$190	CW GBW re DSS/abstention issue (prep for MTD hearing)	Other Motions
11/29/2017	Sarah Colby	2.1	\$950	\$1,995	Meeting with Stacy Stiner (.7), includes travel to and from BSR	Case Organization, Planning and Strategy
11/29/2017	Sarah Colby	0.1	\$950	\$95	edit Stiner letter to Cull	Communications With Opposing Counsel
12/2/2017	Sarah Colby	0.1	\$950	\$95	Texts with Stacy re rate increases and room accessibility	Case Organization, Planning and Strategy
12/4/2017	Guy Wallace	0.6	\$1,350	\$810	tc with GG; DM; KJK; SC re preparation for hearing on motions	Pleadings and Motions Re: Pleadings
12/4/2017	Sarah Colby	0.3	\$950	\$285	Review Fountaingrove FC meeting minutes; review DSS records	Case Organization, Planning and Strategy
12/4/2017	Sarah Colby	0.1	\$950	\$95	TC Rita Stiner re cw ED at BSR re rates rising	Case Organization, Planning and Strategy
12/4/2017	Sarah Colby	0.2	\$950	\$190	research on rate increases; email Jody at CANHR re same	Case Organization, Planning and Strategy
12/4/2017	Sarah Colby	0.2	\$950	\$190	TC DM re class member outreach	Class Outreach and Contact
12/4/2017	Sarah Colby	0.2	\$950	\$190	CW GBW re potential class reps	Class Outreach and Contact
12/4/2017	Sarah Colby	0.4	\$950	\$380	TC GG/DM/GBW/KK re plan for objections to reply/handling hearing/potential class reps	Other Motions
12/6/2017	Sarah Colby	0.2	\$950	\$190	Emails to and from outside attorneys re conservatorship issue; LR on same	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/8/2017	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of D's reply briefs re motion to compel arbitration; motion to dismiss; motion to strike class allegations	Pleadings and Motions Re: Pleadings
12/8/2017	Sarah Colby	0.2	\$950	\$190	Review opinion from JD in Zeng; email from GG re same	Other Motions
12/8/2017	Sarah Colby	1.2	\$950	\$1,140	Review Ds' replies on MTC arb/MTD/MTS; CW GBW re same	Pleadings and Motions Re: Pleadings
12/12/2017	Sarah Colby	0.2	\$950	\$190	Emails re call from ex-ee; tct ex-ee	Case Organization, Planning and Strategy
12/13/2017	Guy Wallace	2.4	\$1,350	\$3,240	review and analysis of D's reply briefs re motion to dismiss; motion to strike class allegations	Pleadings and Motions Re: Pleadings
12/13/2017	Guy Wallace	0.8	\$1,350	\$1,080	tc with GG; CH; DM; KJK; SC re preparation for hearings on D's motions	Pleadings and Motions Re: Pleadings
12/13/2017	Sarah Colby	0.5	\$950	\$475	Review Ds' Reply on MTD	Other Motions
12/13/2017	Sarah Colby	0.4	\$950	\$380	review Ds' reply on MTC arb	Other Motions
12/13/2017	Sarah Colby	0.2	\$950	\$190	Review Declaration filed in support of D's reply on MTC arb and Ps draft objections to it	Other Motions
12/13/2017	Sarah Colby	0.3	\$950	\$285	Review D's Reply on MTS	Other Motions
12/13/2017	Sarah Colby	0.9	\$950	\$855	Call with GG/DM/KK/GBW re replies to MTD/MTS/MTC arb and preparing for oral argument	Other Motions
12/13/2017	Sarah Colby	0.3	\$950	\$285	CW GBW re replies on MTS/MTD/MTC and prep for oral argument	Other Motions
12/14/2017	Sarah Colby	0.1	\$950	\$95	VM and email from and to Bdale employee	Case Organization, Planning and Strategy
12/14/2017	Sarah Colby	0.1	\$950	\$95	VM from R Stiner re docs; review billing docs from R Stiner	Case Organization, Planning and Strategy
12/14/2017	Sarah Colby	0.1	\$950	\$95	Letter to Koh-Sweeney re Stiner co with Cull	Communications With Opposing Counsel

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/14/2017	Sarah Colby	0.2	\$950	\$190	Email from MH; Emails with GBW re same; Email to MH; cw CW re payment	Experts (Including Retention)
12/15/2017	Guy Wallace	0.7	\$1,350	\$945	review and analysis of Order from J. Donato rescheduling hearing; draft letter from GG to Defendant re discovery; F.R.C.P. 26	Pleadings and Motions Re: Pleadings
12/15/2017	Sarah Colby	3.1	\$950	\$2,945	LR for hearing on MTS/MTD; draft memo re issues to prep for; review of briefs and draft potential Qs; review FAC	Other Motions
12/15/2017	Sarah Colby	0.4	\$950	\$380	Review order re hearing moved; emails with GG re same; cw GBW re same/discovery	Other Motions
12/18/2017	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of draft letter from GG to Defendants re proposed Second Amended Complaint, and proposal to serve 1st set of RFPs on Defendants; com's with co-counsel re same	Pleadings and Motions Re: Pleadings
12/18/2017	Guy Wallace	1.2	\$1,350	\$1,620	review and analysis of D's reply brief re motion to compel arbitration	Pleadings and Motions Re: Pleadings
12/18/2017	Sarah Colby	0.2	\$950	\$190	Email from and to GG re class rep move to memory care; find and review regulation re care for residents with dementia	Case Organization, Planning and Strategy
12/18/2017	Sarah Colby	0.4	\$950	\$380	Review newer residency agreement/arbitration provisions; email to co-co re same	Class Certification
12/18/2017	Sarah Colby	0.5	\$950	\$475	Review docs for Ed Boris/Michele Lytel; email to co-co re same	Class Outreach and Contact
12/18/2017	Sarah Colby	0.1	\$950	\$95	Email from and to class member re status of case	Class Outreach and Contact
12/18/2017	Sarah Colby	0.4	\$950	\$380	CW GBW re delay in hearing/SAC/discovery; review letter to OC re SAC/Discovery and emails with co-co re same	Discovery (Non-Deposition)
12/18/2017	Sarah Colby	0.3	\$950	\$285	Review Schnelle article and draft email to Schnelle re staffign expert work	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/19/2017	Sarah Colby	0.7	\$950	\$665	TC co-co re motion to amend complaint and drafting RFPs/getting client records	Case Organization, Planning and Strategy
12/19/2017	Sarah Colby	0.2	\$950	\$190	Emails and VM messages to two class members	Class Outreach and Contact
12/19/2017	Sarah Colby	0.1	\$950	\$95	CW GBW re outreach to class members in SoCal	Class Outreach and Contact
12/19/2017	Sarah Colby	0.2	\$950	\$190	TC Sterling Leonard re Chatsworth facility	Class Outreach and Contact
12/19/2017	Sarah Colby	0.1	\$950	\$95	Email from GG; review CO to OC re client files	Communications With Opposing Counsel
12/19/2017	Sarah Colby	0.1	\$950	\$95	Email J. Schnelle re possible consult; emails with GBW re same	Experts (Including Retention)
12/19/2017	Sarah Colby	0.2	\$950	\$190	Emails to and from Dr. Schnelle; email GG and KK re same; find Schnelle article	Experts (Including Retention)
12/20/2017	Guy Wallace	0.7	\$1,350	\$945	com's with SC re potential expert; review and analysis of article sent by expert re staffing	Discovery (Non-Deposition)
12/20/2017	Sarah Colby	0.1	\$950	\$95	TC Sim Leonard re arbitration agreement; email re same	Class Outreach and Contact
12/20/2017	Sarah Colby	0.2	\$950	\$190	CW GBW x 2 re potential expert	Experts (Including Retention)
12/20/2017	Sarah Colby	0.3	\$950	\$285	TC KK and GG re call with expert	Experts (Including Retention)
12/20/2017	Sarah Colby	0.8	\$950	\$760	review expert article re time studies in AL/dementia; email co-co re same	Experts (Including Retention)
12/21/2017	Guy Wallace	0.7	\$1,350	\$945	com's with APK and GG re P's proposed SAC; meet and confer re discovery and Rule 26(f) conference	Pleadings and Motions Re: Pleadings
12/21/2017	Sarah Colby	0.4	\$950	\$380	Review CO SS with SC; Drafting CO to OC re same	Communications With Opposing Counsel
12/21/2017	Sarah Colby	0.2	\$950	\$190	Review decs from schnelle in another case; cw gbw re same	Experts (Including Retention)
12/21/2017	Sarah Colby	1.0	\$950	\$950	Review email from OC re SAC/Rule 26/Carlson/Stiner; email from GG re CW with OC re same; emails with GG/GBW re SAC/Stiner/Cull; CW GBW re SAC/letter re Stiner	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/21/2017	Sarah Colby	2.8	\$950	\$2,660	Review notes re changes for SAC; drafting SAC	Pleadings and Motions Re: Pleadings
12/22/2017	Sarah Colby	0.1	\$950	\$95	Email from S.E. re B.H. moving	Class Certification
12/22/2017	Sarah Colby	0.1	\$950	\$95	Emails with GBW/KK re RPDs on access	Discovery (Non-Deposition)
12/22/2017	Sarah Colby	0.1	\$950	\$95	Email with Schnelle re D. Marks case	Experts (Including Retention)
12/22/2017	Sarah Colby	0.1	\$950	\$95	Email from GG re update on Schmidt as class rep/amend complaint	Pleadings and Motions Re: Pleadings
12/27/2017	Sarah Colby	0.3	\$950	\$285	Draft letter Stacy; email with co-co re same; text with Stacy re same	Case Organization, Planning and Strategy
12/27/2017	Sarah Colby	0.1	\$950	\$95	Emails to Rita Stiner re billign issues and Stacy letter	Case Organization, Planning and Strategy
12/27/2017	Sarah Colby	2.6	\$950	\$2,470	Drafting SAC (includes doc review and emails with GG re same)	Pleadings and Motions Re: Pleadings
12/27/2017	Sarah Colby	0.1	\$950	\$95	Emails from and to Sharon re Bonita's move and SAC	Pleadings and Motions Re: Pleadings
12/27/2017	Sarah Colby	0.6	\$950	\$570	Review DSS reports for pleading sAC	Pleadings and Motions Re: Pleadings
12/27/2017	Sarah Colby	0.1	\$950	\$95	Emails from GG and class reps re latest personal service plans and eviction notice for SAC	Pleadings and Motions Re: Pleadings
12/28/2017	Sarah Colby	0.5	\$950	\$475	Email and VM from Rita Stiner; TC Rita Stiner re billing (.4)	Case Organization, Planning and Strategy
12/28/2017	Sarah Colby	0.2	\$950	\$190	VM from Sharon; emails w/ Sharon re Bonita move and update on BSR	Case Organization, Planning and Strategy
12/28/2017	Sarah Colby	0.1	\$950	\$95	Review class rep's complaint to licensing re medication errors at BFG	Case Organization, Planning and Strategy
12/28/2017	Sarah Colby	0.1	\$950	\$95	VM from Brookdale Windsor resident re problems there	Class Outreach and Contact
12/28/2017	Sarah Colby	0.2	\$950	\$190	Review Probate petition re potential class rep; email GBW re same	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/2/2018	Sarah Colby	0.1	\$950	\$95	VM from SE; emails to and from SE	Case Organization, Planning and Strategy
1/3/2018	Sarah Colby	1.0	\$950	\$950	TC Sharon to update on case status/new class reps/current conditions at BSR	Case Organization, Planning and Strategy
1/3/2018	Sarah Colby	1.0	\$950	\$950	Review DSS records for class cert issues	Class Certification
1/4/2018	Sarah Colby	0.2	\$950	\$190	Emails with co-co re RFPDs/DSS records and additions to SAC	Case Organization, Planning and Strategy
1/5/2018	Sarah Colby	1.6	\$950	\$1,520	Editing SAC	Pleadings and Motions Re: Pleadings
1/8/2018	Sarah Colby	0.1	\$950	\$95	Email from KK re status of Florida case and potential cooperation	Case Organization, Planning and Strategy
1/10/2018	Guy Wallace	0.4	\$1,350	\$540	com's with SC re preparation of SAC	Pleadings and Motions Re: Pleadings
1/10/2018	Sarah Colby	0.2	\$950	\$190	VM from SE; emails with SE re possible witness; CW GBW re same	Case Organization, Planning and Strategy
1/10/2018	Sarah Colby	0.1	\$950	\$95	Emails with co-co re SAC	Pleadings and Motions Re: Pleadings
1/10/2018	Sarah Colby	0.8	\$950	\$760	Editing SAC, includes doc review	Pleadings and Motions Re: Pleadings
1/11/2018	Guy Wallace	2.2	\$1,350	\$2,970	review and analysis of draft of SAC	Pleadings and Motions Re: Pleadings
1/11/2018	Sarah Colby	2.5	\$950	\$2,375	Draft/edit SAC	Pleadings and Motions Re: Pleadings
1/12/2018	Guy Wallace	0.2	\$1,350	\$270	email and voicemail message to APK re P's requests for resident files of additional potential plaintiffs	Communications With Opposing Counsel
1/12/2018	Guy Wallace	0.5	\$1,350	\$675	com's with GG; CH; DM; SC re revisions to draft of SAC and requests for files to Defendant	Pleadings and Motions Re: Pleadings
1/12/2018	Guy Wallace	0.9	\$1,350	\$1,215	legal research and analysis re amendments to draft SAC re access allegations and policy and/or practice issues	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/12/2018	Sarah Colby	0.3	\$950	\$285	TC GG/DM/CH/GBW re additions/changes to the SAC and gettign clients' records	Pleadings and Motions Re: Pleadings
1/12/2018	Sarah Colby	2.4	\$950	\$2,280	Drafting/editing the SAC	Pleadings and Motions Re: Pleadings
1/12/2018	Sarah Colby	0.6	\$950	\$570	CW GBW x 3 re changes to the SAC	Pleadings and Motions Re: Pleadings
1/16/2018	Sarah Colby	0.2	\$950	\$190	CW GBW re SAC	Pleadings and Motions Re: Pleadings
1/17/2018	Sarah Colby	0.4	\$950	\$380	TC Sharon re developments at BSR; emails with Sharon re meeting	Case Organization, Planning and Strategy
1/17/2018	Sarah Colby	0.7	\$950	\$665	Review dSS records for B facilities statewide	Class Certification
1/17/2018	Sarah Colby	0.1	\$950	\$95	TC GG re RFPDs and letter to OC re Carlson agreement; CW GBW re same	Discovery (Non-Deposition)
1/19/2018	Guy Wallace	0.3	\$1,350	\$405	com's with APK and co-counsel re resident files	Pleadings and Motions Re: Pleadings
1/19/2018	Sarah Colby	0.1	\$950	\$95	Emails re resident records with co-counsel	Discovery (Non-Deposition)
1/21/2018	Sarah Colby	0.2	\$950	\$190	Emails from co-co re amended arb agreement and D's response to email re same; LR on transfer trauma issue; emails to co-co re same	Pleadings and Motions Re: Pleadings
1/23/2018	Sarah Colby	0.8	\$950	\$760	Review DSS updated records	Class Certification
1/24/2018	Sarah Colby	3.2	\$950	\$3,040	Meeting with SE and SS re case developments/situation at BSR (includes travel to and from)	Case Organization, Planning and Strategy
1/24/2018	Sarah Colby	0.1	\$950	\$95	Review letter to OC; emails with co-co re same and SAC	Communications With Opposing Counsel

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/25/2018	Guy Wallace	4.2	\$1,350	\$5,670	legal research and analysis re recent decisions re uniform corporate policies and practices; centralization; standardization; potential for uninjured members within the class; and implications for analysis of the commonality and predominance prongs	Class Certification
1/25/2018	Sarah Colby	1.7	\$950	\$1,615	Draft/edit SAC; TC GBW re same	Pleadings and Motions Re: Pleadings
1/26/2018	Guy Wallace	2.9	\$1,350	\$3,915	revise and edit draft of SAC; incorporate additional allegations re uniform policies and practices, centralization and standardization of corporate operations	Pleadings and Motions Re: Pleadings
1/26/2018	Guy Wallace	0.8	\$1,350	\$1,080	tc with GG; CH; DM; KJK; SC re draft of SAC and further revisions to same	Pleadings and Motions Re: Pleadings
1/26/2018	Guy Wallace	0.3	\$1,350	\$405	com's with SC; STM re draft of SAC	Pleadings and Motions Re: Pleadings
1/26/2018	Sarah Colby	1.6	\$950	\$1,520	REview/edit RFPDs set one	Discovery (Non-Deposition)
1/26/2018	Sarah Colby	3.0	\$950	\$2,850	Draft/edit SAC (includes review of client docs)	Pleadings and Motions Re: Pleadings
1/26/2018	Sarah Colby	0.8	\$950	\$760	TC GG/DM/CH/KK/GBW re SAC and RFPs	Pleadings and Motions Re: Pleadings
1/26/2018	Sarah Colby	0.2	\$950	\$190	TC GBW re discovery and SAC	Pleadings and Motions Re: Pleadings
1/29/2018	Guy Wallace	0.8	\$1,350	\$1,080	revise and edit draft RFPs; com's with SC re same	Discovery (Non-Deposition)
1/29/2018	Guy Wallace	0.4	\$1,350	\$540	com's with SC re revisions to draft SAC	Pleadings and Motions Re: Pleadings
1/29/2018	Sarah Colby	0.4	\$950	\$380	TC KK re RFPDs and ROGs	Discovery (Non-Deposition)
1/29/2018	Sarah Colby	3.0	\$950	\$2,850	Editing/drafting RFPs	Discovery (Non-Deposition)
1/29/2018	Sarah Colby	0.8	\$950	\$760	Drafting ROGs, includes research for definitions; review expert notes	Discovery (Non-Deposition)
1/29/2018	Sarah Colby	0.6	\$950	\$570	CW GBW going over RPDs and ROGs	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/29/2018	Sarah Colby	0.8	\$950	\$760	Review/Edit SAC, includes record review	Pleadings and Motions Re: Pleadings
1/29/2018	Sarah Colby	0.3	\$950	\$285	CW GBW re class reps/arbitration issue; review MG arbitration agreements	Pleadings and Motions Re: Pleadings
1/30/2018	Sarah Colby	1.7	\$950	\$1,615	Review Galvez MSJs from each party re issue of "requesting modifications"; look up cited cases and research statute	Case Organization, Planning and Strategy
1/30/2018	Sarah Colby	0.7	\$950	\$665	TC son of Vacaville resident re problems with understaffing	Class Outreach and Contact
1/30/2018	Sarah Colby	0.5	\$950	\$475	TC Sharon Eidler re 10-year resident's recent experiences	Class Outreach and Contact
1/30/2018	Sarah Colby	0.2	\$950	\$190	CW GBW re potential class rep and discovery	Class Outreach and Contact
1/31/2018	Sarah Colby	4.0	\$950	\$3,800	Meeting with Sharon Eidler re Ds' motions/documents/potential witnesses (2.6); meeting with Bonita Hager re arb motion (.4); travel to and from; TC GBW re class reps (.1)	Other Motions
2/1/2018	Guy Wallace	0.5	\$1,350	\$675	analysis of D's failure to produce resident files, and schedule re filing of proposed Second Amended Complaint; com's with GG re same	Pleadings and Motions Re: Pleadings
2/2/2018	Guy Wallace	0.5	\$1,350	\$675	com's with SC re revised draft of SAC; D's failure to produce resident files; Eidler	Pleadings and Motions Re: Pleadings
2/2/2018	Sarah Colby	0.4	\$950	\$380	TC Sharon Eidler re Shawn Cull calling police on her for hanging flyers re F.C. meeting	Case Organization, Planning and Strategy
2/2/2018	Sarah Colby	0.4	\$950	\$380	TC GBW x 3 re Shawn Cull calling police on Sharon Eidler for hanging flyers re F.C. meeting/edits to SAC	Case Organization, Planning and Strategy
2/2/2018	Sarah Colby	0.9	\$950	\$855	Edits to SAC based on CW GBW	Pleadings and Motions Re: Pleadings
2/2/2018	Sarah Colby	0.3	\$950	\$285	CW GBW re SAC/class reps issues	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/3/2018	Sarah Colby	0.2	\$950	\$190	Email to SE re issue with Cull; review email from SE re police report; forward to GBW	Case Organization, Planning and Strategy
2/3/2018	Sarah Colby	0.2	\$950	\$190	Emails from and to Chris Eidler re SAC; Emails to and from GBW re same	Pleadings and Motions Re: Pleadings
2/4/2018	Sarah Colby	0.1	\$950	\$95	Emails from SE re FC meeting/March hearing/Stacy's carpet	Case Organization, Planning and Strategy
2/5/2018	Guy Wallace	0.4	\$1,350	\$540	tc with GG and SC re draft SAC and motion for leave to amend	Pleadings and Motions Re: Pleadings
2/5/2018	Guy Wallace	0.5	\$1,350	\$675	com's with SC re Eidler and amendments to draft SAC re same	Pleadings and Motions Re: Pleadings
2/5/2018	Guy Wallace	0.6	\$1,350	\$810	review and analysis of draft SAC	Pleadings and Motions Re: Pleadings
2/5/2018	Sarah Colby	0.9	\$950	\$855	Draft letter to AKS re Friday incident with Cull/Eidler	Communications With Opposing Counsel
2/5/2018	Sarah Colby	0.4	\$950	\$380	Edit CO to OC re Cull incident	Communications With Opposing Counsel
2/5/2018	Sarah Colby	0.5	\$950	\$475	DRaft CO to CHris Eidler re arbitration motion/SAC; review retainer and Residency Agreement	Pleadings and Motions Re: Pleadings
2/5/2018	Sarah Colby	0.2	\$950	\$190	CW GBW re SAC and motion to amend if necessary	Pleadings and Motions Re: Pleadings
2/5/2018	Sarah Colby	0.1	\$950	\$95	CW GBW re TC with Chris Eidler and SAC	Pleadings and Motions Re: Pleadings
2/5/2018	Sarah Colby	0.4	\$950	\$380	TC Sharon Eidler re incident with Shawn Cull and time to talk to Chris Eidler	Pleadings and Motions Re: Pleadings
2/5/2018	Sarah Colby	0.3	\$950	\$285	TC Chris Eidler re SAC	Pleadings and Motions Re: Pleadings
2/5/2018	Sarah Colby	0.2	\$950	\$190	TC Rita Stiner re current charges for Stacy Stiner for SAC	Pleadings and Motions Re: Pleadings
2/5/2018	Sarah Colby	3.2	\$950	\$3,040	Editing SAC, includes emails with co-co re same and review of client docs	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/5/2018	Sarah Colby	0.4	\$950	\$380	TC GG/GBW re changes to SAC/withdrawal of class reps/addition of class reps	Pleadings and Motions Re: Pleadings
2/5/2018	Sarah Colby	2.0	\$950	\$1,900	Review and edit SAC draft	Pleadings and Motions Re: Pleadings
2/5/2018	Sarah Colby	0.2	\$950	\$190	Review co from GG to Jones family; draft letter to Eidlrs re dismissal.	Pleadings and Motions Re: Pleadings
2/6/2018	Guy Wallace	0.7	\$1,350	\$945	preparation and drafting of letter to APK re draft SAC; revise and edit same	Communications With Opposing Counsel
2/6/2018	Guy Wallace	6.4	\$1,350	\$8,640	review and analysis of draft of SAC and redlines of same; revise and edit same	Pleadings and Motions Re: Pleadings
2/6/2018	Guy Wallace	0.8	\$1,350	\$1,080	com's with GG; DM; CH; SC re draft SAC	Pleadings and Motions Re: Pleadings
2/6/2018	Sarah Colby	0.3	\$950	\$285	Review DSS updates	Case Organization, Planning and Strategy
2/6/2018	Sarah Colby	0.3	\$950	\$285	Review DSS reports and email to co-co re same	Case Organization, Planning and Strategy
2/6/2018	Sarah Colby	0.5	\$950	\$475	Edit SAC; emails with co-co re same	Pleadings and Motions Re: Pleadings
2/6/2018	Sarah Colby	0.3	\$950	\$285	TC GBW and Loesia re SAC allegations	Pleadings and Motions Re: Pleadings
2/6/2018	Sarah Colby	0.2	\$950	\$190	CW GBW re edits to the SAC	Pleadings and Motions Re: Pleadings
2/6/2018	Sarah Colby	0.1	\$950	\$95	TC DM re cw ex-conservator and Schmidt allegations in SAC	Pleadings and Motions Re: Pleadings
2/6/2018	Sarah Colby	0.1	\$950	\$95	TC GBW re latest draft of SAC and edits to Schmidt section	Pleadings and Motions Re: Pleadings
2/6/2018	Sarah Colby	1.7	\$950	\$1,615	Editing SAC	Pleadings and Motions Re: Pleadings
2/6/2018	Sarah Colby	0.4	\$950	\$380	edit letters to Eidlrs and Hager	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/6/2018	Sarah Colby	0.5	\$950	\$475	Review changes to Schmidt allegations and DM comments re same; incorporate allegations into SAC; make comparison document and email to GBW	Pleadings and Motions Re: Pleadings
2/6/2018	Sarah Colby	1.0	\$950	\$950	Fixing issues with redline and clean version of draft SAC to send to OC; TC GBW x 4 and TC SM re same	Pleadings and Motions Re: Pleadings
2/6/2018	Sarah Colby	0.5	\$950	\$475	TC GBW x 5 re SAC draft/letters to clients re same/resident records	Pleadings and Motions Re: Pleadings
2/6/2018	Sarah Colby	0.1	\$950	\$95	emails with co-co re resident records and SAC allegations	Pleadings and Motions Re: Pleadings
2/7/2018	Guy Wallace	0.7	\$1,350	\$945	com's with GG; DM; CH; SC re further revisions to draft SAC	Pleadings and Motions Re: Pleadings
2/7/2018	Sarah Colby	0.1	\$950	\$95	emails from and to Sharon re records	Case Organization, Planning and Strategy
2/7/2018	Sarah Colby	0.8	\$950	\$760	REvising 1st Set RFPs	Discovery (Non-Deposition)
2/7/2018	Sarah Colby	0.3	\$950	\$285	Emails with co-co re edits to SAC/client records; CW GBW re same	Pleadings and Motions Re: Pleadings
2/7/2018	Sarah Colby	0.1	\$950	\$95	Email with additional changes to SAC; review notes on same	Pleadings and Motions Re: Pleadings
2/7/2018	Sarah Colby	0.2	\$950	\$190	Edit CO to BH; emails with GBW and co-co re same; cw SM re sending letter	Pleadings and Motions Re: Pleadings
2/7/2018	Sarah Colby	0.1	\$950	\$95	Emails from and to SE/CE re TAC and dismissal	Pleadings and Motions Re: Pleadings
2/8/2018	Guy Wallace	1.9	\$1,350	\$2,565	revise and edit draft SAC; com's with co-counsel re same	Pleadings and Motions Re: Pleadings
2/8/2018	Sarah Colby	0.1	\$950	\$95	Email from and to Sharon re notices posted	Case Organization, Planning and Strategy
2/8/2018	Sarah Colby	0.3	\$950	\$285	Emails with co-co re edits to proposed SAC/motion for leave to file SAC/co to client	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/8/2018	Sarah Colby	2.2	\$950	\$2,090	Review/edit proposed SAC; emails with GBW re same	Pleadings and Motions Re: Pleadings
2/9/2018	Guy Wallace	1.1	\$1,350	\$1,485	revise and edit draft of SAC; com's with APK; SC; DM re same	Pleadings and Motions Re: Pleadings
2/9/2018	Sarah Colby	0.3	\$950	\$285	REview/edit RFPDs and send to co-co	Discovery (Non-Deposition)
2/9/2018	Sarah Colby	3.4	\$950	\$3,230	Review proposed SAC; emails to co-co with questions/need for confirmations	Pleadings and Motions Re: Pleadings
2/9/2018	Sarah Colby	0.5	\$950	\$475	CW GBW (various) re changes to SAC and CW OC re same	Pleadings and Motions Re: Pleadings
2/12/2018	Guy Wallace	0.4	\$1,350	\$540	review and analysis of letter from Barker and com's with GG; CH; SC re same	Pleadings and Motions Re: Pleadings
2/12/2018	Guy Wallace	1.3	\$1,350	\$1,755	review and analysis of and revise and edit draft motion for leave to amend	Pleadings and Motions Re: Pleadings
2/12/2018	Sarah Colby	0.2	\$950	\$190	Emails with co-co re letter from OC re SAC	Communications With Opposing Counsel
2/13/2018	Guy Wallace	0.5	\$1,350	\$675	revise and edit P's draft motion for leave to amend	Pleadings and Motions Re: Pleadings
2/13/2018	Guy Wallace	0.4	\$1,350	\$540	review and analysis of further edits to draft SAC; com's with SC re same	Pleadings and Motions Re: Pleadings
2/13/2018	Sarah Colby	3.5	\$950	\$3,325	Review/edit proposed SAC; email co-co re same	Pleadings and Motions Re: Pleadings
2/13/2018	Sarah Colby	0.4	\$950	\$380	Review/edit Motion for Leave to file SAC; email co-co re same	Pleadings and Motions Re: Pleadings
2/14/2018	Guy Wallace	1.2	\$1,350	\$1,620	review and analysis of P's motion for leave to amend; revise and edit same and com's with GG;SC re same	Pleadings and Motions Re: Pleadings
2/14/2018	Sarah Colby	0.3	\$950	\$285	TC GG/DM/CH re edits to proposed SAC	Pleadings and Motions Re: Pleadings
2/14/2018	Sarah Colby	1.1	\$950	\$1,045	Make edits to proposed SAC and compare changes; TC x 3 with CH re changes and comparing docs	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/14/2018	Sarah Colby	0.1	\$950	\$95	Emails with co-co re dismissal of class rep claims	Pleadings and Motions Re: Pleadings
2/14/2018	Sarah Colby	0.1	\$950	\$95	TC GBW re proposed SAC	Pleadings and Motions Re: Pleadings
2/21/2018	Sarah Colby	0.2	\$950	\$190	Edit RFPs Set One; review pleadings and email to co-co re Rule 26	Discovery (Non-Deposition)
2/21/2018	Sarah Colby	0.1	\$950	\$95	Review/edit Requests for Dismissal	Pleadings and Motions Re: Pleadings
2/22/2018	Sarah Colby	0.1	\$950	\$95	Email from GG re discovery; email gbw re same	Discovery (Non-Deposition)
2/23/2018	Guy Wallace	0.4	\$1,350	\$540	revise and edit draft RFPs; com's with co-counsel re same	Discovery (Non-Deposition)
2/23/2018	Sarah Colby	0.2	\$950	\$190	MF S. Eidler re issue at BSR police report; email re Brookdale stock and re-organization; email from and to SE re same	Case Organization, Planning and Strategy
2/23/2018	Sarah Colby	0.1	\$950	\$95	TC DM re RFPs; email KK re class member	Discovery (Non-Deposition)
2/23/2018	Sarah Colby	0.1	\$950	\$95	Emails re RFPs with GBW/GG/DM/KAS	Discovery (Non-Deposition)
2/23/2018	Sarah Colby	0.1	\$950	\$95	Email from and to GG re prep for MTD/MTC hearing on 3/22	Other Motions
2/26/2018	Sarah Colby	0.1	\$950	\$95	Emails from and to SE re resident's injury; email notice of dismissal to SE/CE	Case Organization, Planning and Strategy
2/26/2018	Sarah Colby	1.0	\$950	\$950	TC Sharon Eidler re injury to BSR resident/Cull's quasi-FC meeting/evacuations/5% increase/potential class member declarations	Class Certification
2/26/2018	Sarah Colby	0.1	\$950	\$95	CW RFPs edits and service	Discovery (Non-Deposition)
2/26/2018	Sarah Colby	0.5	\$950	\$475	Final review/edits to RPDs, set one; cw SM re service; cw GBW re Rule 26 exception;	Discovery (Non-Deposition)
2/26/2018	Sarah Colby	0.1	\$950	\$95	Email from and to GG et al re rFPs and death of new class representative	Pleadings and Motions Re: Pleadings
2/28/2018	Sarah Colby	0.1	\$950	\$95	Review draft letter from GG to OC re amending complaint	Communications With Opposing Counsel

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/1/2018	Sarah Colby	0.1	\$950	\$95	Emails with GG re hearing prep; emails with GBW re same	Other Motions
3/2/2018	Guy Wallace	0.5	\$1,350	\$675	com's with GG; SC re order changing hearing date on motion and preparation re same	Pleadings and Motions Re: Pleadings
3/7/2018	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of motion for leave to amend; preparation for mtg. w/ GG re hearing prep	Pleadings and Motions Re: Pleadings
3/7/2018	Sarah Colby	0.1	\$950	\$95	CW GBW re other Brookdale case	Case Organization, Planning and Strategy
3/8/2018	Guy Wallace	0.8	\$1,350	\$1,080	preparation for meeting with GG re hearing prep	Pleadings and Motions Re: Pleadings
3/8/2018	Sarah Colby	0.3	\$950	\$285	CW Fishkin re potential client/conflict issue	Case Organization, Planning and Strategy
3/9/2018	Guy Wallace	2.8	\$1,350	\$3,780	prepare for and attend argument preparation mtg. w/ GG; BBK; DM; SC re D's motion on the pleadings	Pleadings and Motions Re: Pleadings
3/9/2018	Guy Wallace	2.9	\$1,350	\$3,915	review and analysis of D's motions to dismiss and strike class allegations; preparation of questions for moot of argument on hearing re same	Pleadings and Motions Re: Pleadings
3/9/2018	Sarah Colby	3.1	\$950	\$2,945	Moot court for hearing on MTD/MTS/MTC arb/MTA (includes travel to and from SF)	Other Motions
3/9/2018	Sarah Colby	0.6	\$950	\$570	Prep for moot court for hearing on MTD/MTS/MTC arb/MTF TAC	Other Motions
3/12/2018	Guy Wallace	0.3	\$1,350	\$405	com's with GG; SC re preparation for hearing on D's pending motions	Pleadings and Motions Re: Pleadings
3/12/2018	Sarah Colby	0.2	\$950	\$190	Email from GG re oral argument; draft responses to GG's questions.	Other Motions
3/13/2018	Sarah Colby	0.3	\$950	\$285	CW GG re hearing on MTD/MTS/MTC arb/MTA	Other Motions
3/14/2018	Guy Wallace	0.4	\$1,350	\$540	com's with GG re preparation for hearing re D's motions on the pleadings	Pleadings and Motions Re: Pleadings
3/14/2018	Sarah Colby	0.1	\$950	\$95	Review email from class rep and Brookdale letter re rate increase	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/14/2018	Sarah Colby	0.4	\$950	\$380	TCT Brookdale Windsor resident re her problems there	Class Outreach and Contact
3/14/2018	Sarah Colby	0.1	\$950	\$95	EMails with GG/GBW re reasonable accommodation class; tc gbw re same	Other Motions
3/15/2018	Sarah Colby	2.6	\$950	\$2,470	Attend hearing on MTA/MTD/MTS/MTC arb; includes travel to and from SF	Other Motions
3/19/2018	Sarah Colby	0.3	\$950	\$285	TC DM/Pat Lindstrom re estate set-up for drafting SAC; email to Pat re same	Pleadings and Motions Re: Pleadings
3/22/2018	Sarah Colby	0.1	\$950	\$95	Emails with GG re resident/family council meetings	Case Organization, Planning and Strategy
3/23/2018	Sarah Colby	0.4	\$950	\$380	TC GG re potential sales of facilities/potential PI motion/SAC	Case Organization, Planning and Strategy
3/23/2018	Sarah Colby	0.2	\$950	\$190	Review estate docs from Pat Lindstrom for editing SAC	Pleadings and Motions Re: Pleadings
3/24/2018	Sarah Colby	2.2	\$950	\$2,090	DRaft/edit SAC (includes LR and doc review); email co-co re same	Pleadings and Motions Re: Pleadings
3/24/2018	Sarah Colby	0.3	\$950	\$285	Review living trust and will docs and draft successor-in-interest declaration for P. Lindstrom	Pleadings and Motions Re: Pleadings
3/24/2018	Sarah Colby	0.1	\$950	\$95	Email from GG re SAC; edit SAC per same	Pleadings and Motions Re: Pleadings
3/26/2018	Sarah Colby	0.1	\$950	\$95	Emails from DM re facts for SAC	Pleadings and Motions Re: Pleadings
3/27/2018	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of draft of SAC; com's with GG and SC re same (.3)	Pleadings and Motions Re: Pleadings
3/27/2018	Sarah Colby	0.6	\$950	\$570	Edits to SAC (includes LR on resident councils); cw GBW re same	Pleadings and Motions Re: Pleadings
3/27/2018	Sarah Colby	0.3	\$950	\$285	Review/edit GAL declarations	Pleadings and Motions Re: Pleadings
3/27/2018	Sarah Colby	0.4	\$950	\$380	CW GBW re SAC and resident/family council issue; emails with GG re same; additional edits to SAC	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/27/2018	Sarah Colby	0.2	\$950	\$190	Additional edits to SAC; email GG re same	Pleadings and Motions Re: Pleadings
3/28/2018	Sarah Colby	0.1	\$950	\$95	Email from and to GG re allegations re new class rep	Pleadings and Motions Re: Pleadings
3/28/2018	Sarah Colby	0.1	\$950	\$95	CW GG re finishing up SAC/GAL apps and filing	Pleadings and Motions Re: Pleadings
3/28/2018	Sarah Colby	0.5	\$950	\$475	Review/edit SAC; cw EG/SM re filing	Pleadings and Motions Re: Pleadings
3/28/2018	Sarah Colby	0.1	\$950	\$95	Review Declaration; cw SM re same	Pleadings and Motions Re: Pleadings
3/28/2018	Sarah Colby	1.0	\$950	\$950	Review/edit SAC	Pleadings and Motions Re: Pleadings
3/28/2018	Sarah Colby	0.1	\$950	\$95	Review GAL application	Pleadings and Motions Re: Pleadings
3/29/2018	Sarah Colby	3.1	\$950	\$2,945	Final review/edit of SAC	Pleadings and Motions Re: Pleadings
3/29/2018	Sarah Colby	0.1	\$950	\$95	CW SM re filing SAC	Pleadings and Motions Re: Pleadings
4/3/2018	Guy Wallace	0.3	\$1,350	\$405	com's with GG; APK re D's next round of motions to dismiss and schedule re same	Pleadings and Motions Re: Pleadings
4/5/2018	Guy Wallace	0.3	\$1,350	\$405	com's with APK; GG; SC re schedule on further motions on the pleadings; Rule 26(f) conference	Pleadings and Motions Re: Pleadings
4/5/2018	Sarah Colby	0.1	\$950	\$95	Emails with co-co re potential letter to OC re retaliation	Communications With Opposing Counsel
4/6/2018	Sarah Colby	0.1	\$950	\$95	email from GG re Rule 26f conf	Case Organization, Planning and Strategy
4/9/2018	Guy Wallace	0.5	\$1,350	\$675	review and analysis of D's proposed stipulation re schedule on further pleading motions; com's with GG re same; APK re same	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/9/2018	Sarah Colby	0.2	\$950	\$190	TC Brookdale Chanate resident re DSS citations and current status	Case Organization, Planning and Strategy
4/9/2018	Sarah Colby	0.1	\$950	\$95	Emails between GBW and AKS re motion schedule and Rule 26 conference	Communications With Opposing Counsel
4/16/2018	Guy Wallace	0.2	\$1,350	\$270	review and analysis of order reassigning case to J. Gilliam; com's with SC re same	Case Organization, Planning and Strategy
4/16/2018	Guy Wallace	0.4	\$1,350	\$540	review and analysis of draft of Rule 7-11 motion re opening discovery	Other Motions
4/16/2018	Sarah Colby	0.1	\$950	\$95	TC Devin re admin motion re relief from stip.	Other Motions
4/16/2018	Sarah Colby	0.1	\$950	\$95	Review orders relating case and transferring to Gilliam	Pleadings and Motions Re: Pleadings
4/17/2018	Guy Wallace	0.3	\$1,350	\$405	com's with co-counsel re Local Rule 7-11 motion and meet and confer efforts re same	Other Motions
4/19/2018	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of D's further motions on the pleadings	Pleadings and Motions Re: Pleadings
4/19/2018	Sarah Colby	0.1	\$950	\$95	Review order re CMC; email co-co and GBW re same	Pleadings and Motions Re: Pleadings
4/20/2018	Guy Wallace	0.7	\$1,350	\$945	com's with GG; SC re CMC set for 4/24 by J. Gilliam	Case Management Conferences
4/20/2018	Guy Wallace	0.6	\$1,350	\$810	review and analysis of D's motion to strike class allegations	Pleadings and Motions Re: Pleadings
4/20/2018	Sarah Colby	0.1	\$950	\$95	Emails re CMC; email with GBW re same	Case Management Conferences
4/21/2018	Guy Wallace	1.6	\$1,350	\$2,160	legal research and analysis re standard on motions to strike class allegations under FRCP 12(f)	Pleadings and Motions Re: Pleadings
4/23/2018	Guy Wallace	0.5	\$1,350	\$675	com's with GG; SC re preparation for CMC; schedule re D's pending motions	Case Management Conferences
4/23/2018	Sarah Colby	0.1	\$950	\$95	CW GBW re opp to admin motion/FHAA claim?	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/23/2018	Sarah Colby	1.1	\$950	\$1,045	LR on limits of FHAA claims	Case Organization, Planning and Strategy
4/23/2018	Sarah Colby	0.4	\$950	\$380	Review opp to admin motion; read cases cited therein	Other Motions
4/23/2018	Sarah Colby	0.1	\$950	\$95	TC GBW re MTD/MTC/MTS opps	Other Motions
4/23/2018	Sarah Colby	1.2	\$950	\$1,140	Review MTD/MTS/MTC arb; LR on agency argument	Other Motions
4/24/2018	Guy Wallace	2.3	\$1,350	\$3,105	prepare for and attend initial CMC with Judge Gilliam; com's with GG; SC re results of same and D's pending motions on the pleadings	Case Management Conferences
4/24/2018	Sarah Colby	3.1	\$950	\$2,945	Attend CMC (includes travel to and from SF); meet with GBW before; meet with GBW/GG after	Case Management Conferences
4/24/2018	Sarah Colby	0.9	\$950	\$855	CW GBW re oppositions to MTD/MTS x 3; emails with co-co re same	Other Motions
4/25/2018	Sarah Colby	0.2	\$950	\$190	Edit update for S.E.; email same to co-co	Case Organization, Planning and Strategy
4/25/2018	Sarah Colby	0.3	\$950	\$285	TC Sharon Eidler update re motions and hearing yesterday	Case Organization, Planning and Strategy
4/25/2018	Sarah Colby	2.4	\$950	\$2,280	LR cases cited by Ds in MTD/issue of public accommodations; outline argument	Other Motions
4/25/2018	Sarah Colby	0.2	\$950	\$190	Emails with GBW re motion to strike	Other Motions
4/26/2018	Guy Wallace	1.1	\$1,350	\$1,485	com's with SC re D's argument re Tribendis case; review and analysis of same and statutory standing as opposed to Article III standing issues	Pleadings and Motions Re: Pleadings
4/26/2018	Sarah Colby	0.2	\$950	\$190	review co from class member to ED; Emails with DM re same	Class Outreach and Contact
4/26/2018	Sarah Colby	0.5	\$950	\$475	Review MTD/MTS against previous motions	Other Motions
4/26/2018	Sarah Colby	0.1	\$950	\$95	Emails with OC and GBW re stip re briefing schedule	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/26/2018	Sarah Colby	0.3	\$950	\$285	Draft stip re briefing schedule--includes review of docket for procedural history; emails with co-co and OC re same	Pleadings and Motions Re: Pleadings
4/27/2018	Guy Wallace	0.3	\$1,350	\$405	com's with D's counsel; GG; SC re schedule on D's pleadings motions	Pleadings and Motions Re: Pleadings
4/27/2018	Sarah Colby	0.3	\$950	\$285	Emails re stipulation on briefing schedule; review and make changes from OC; cw SM re filing stip	Pleadings and Motions Re: Pleadings
4/30/2018	Sarah Colby	0.3	\$950	\$285	TC S. Eidler re situation at BSR/potential witness	Case Organization, Planning and Strategy
5/1/2018	Sarah Colby	0.2	\$950	\$190	CW GBW re opps to MTS/MTD	Other Motions
5/1/2018	Sarah Colby	1.8	\$950	\$1,710	Review/outline opp to MTS class allegations; includes LR	Other Motions
5/1/2018	Sarah Colby	2.6	\$950	\$2,470	Review/draft outline to opp to MTD; LR on ADA claims and defenses	Other Motions
5/2/2018	Sarah Colby	0.1	\$950	\$95	Email from GG to OC re hearing date; emails with SE re meeting with Stacy	Case Organization, Planning and Strategy
5/2/2018	Sarah Colby	0.5	\$950	\$475	Drafting opp to MTD	Other Motions
5/3/2018	Sarah Colby	4.5	\$950	\$4,275	Meeting with Stacy Stiner (includes travel to Dublin restaurant and from BSR)	Case Organization, Planning and Strategy
5/3/2018	Sarah Colby	0.2	\$950	\$190	Emails and texts from and to S. Eidler re family council issues and co from oc	Case Organization, Planning and Strategy
5/3/2018	Sarah Colby	0.5	\$950	\$475	Research on corporate developments at Brookdale	Case Organization, Planning and Strategy
5/4/2018	Sarah Colby	0.5	\$950	\$475	TC Bdale Palm Springs resident re meds problems; draft record request and email to resident	Case Organization, Planning and Strategy
5/4/2018	Sarah Colby	0.3	\$950	\$285	Research on Brookdale corporate developments	Case Organization, Planning and Strategy
5/4/2018	Sarah Colby	0.1	\$950	\$95	Emails between GG and OC re moving hearing date	Other Motions
5/5/2018	Guy Wallace	2.6	\$1,350	\$3,510	review and analysis of D's motion to strike class allegations; legal research and analysis re same	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/7/2018	Guy Wallace	3.2	\$1,350	\$4,320	review and analysis of D's 12(b)(6) and motions to strike	Pleadings and Motions Re: Pleadings
5/7/2018	Sarah Colby	0.5	\$950	\$475	TC Sharon re FC flyers and transportation	Case Organization, Planning and Strategy
5/7/2018	Sarah Colby	0.1	\$950	\$95	Review admin motion to shorten time on hearing date; emails with DM re same	Other Motions
5/7/2018	Sarah Colby	0.3	\$950	\$285	CW GBW x 2 re standing/cases cited by Ds/new info in motions	Other Motions
5/7/2018	Sarah Colby	5.0	\$950	\$4,750	Drafting opp to MTD (standing), includes legal research	Other Motions
5/8/2018	Guy Wallace	2.6	\$1,350	\$3,510	preparation of arguments re D's motions on the pleadings	Pleadings and Motions Re: Pleadings
5/8/2018	Sarah Colby	4.5	\$950	\$4,275	drafting opp to MTD--public accommodation--includes research	Other Motions
5/9/2018	Guy Wallace	3.8	\$1,350	\$5,130	review and analysis of D's MTS class allegations; preparation of arguments re same and legal research re same; com's with SC re same (.4)	Pleadings and Motions Re: Pleadings
5/9/2018	Guy Wallace	2.4	\$1,350	\$3,240	review and analysis of D's motion to dismiss; preparation of points and arguments re same; com's with SC re same (.3)	Pleadings and Motions Re: Pleadings
5/9/2018	Guy Wallace	1.9	\$1,350	\$2,565	legal research and analysis re policy and practice claims and certification of same under the ADA	Pleadings and Motions Re: Pleadings
5/9/2018	Sarah Colby	0.1	\$950	\$95	Emails from KAS re depositions of 30b6 witnesses in other cases	Case Organization, Planning and Strategy
5/9/2018	Sarah Colby	1.1	\$950	\$1,045	TC SE re FC meeting last night and additional info re developments from family members	Case Organization, Planning and Strategy
5/9/2018	Sarah Colby	0.2	\$950	\$190	LR on FHAA requirements; email to GG re same	Case Organization, Planning and Strategy
5/9/2018	Sarah Colby	0.1	\$950	\$95	Emails with SE re hearing date and FC meeting	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/9/2018	Sarah Colby	0.2	\$950	\$190	Review GBW memo on MTD; TC GBW re same	Other Motions
5/9/2018	Sarah Colby	0.2	\$950	\$190	CW GBW re MTS/arbitration; emails with GBW re same	Other Motions
5/9/2018	Sarah Colby	0.2	\$950	\$190	TC GG re MTC arbitration/FHAA issues	Other Motions
5/9/2018	Sarah Colby	3.2	\$950	\$3,040	Drafting/editing opp to MTD--public accommodation/standing/discrimination	Other Motions
5/10/2018	Guy Wallace	5.2	\$1,350	\$7,020	preparation and drafting of opposition to D's MTS class allegations; com's with SC re same (.8)	Pleadings and Motions Re: Pleadings
5/10/2018	Sarah Colby	5.8	\$950	\$5,510	Drafting/editing opp to MTD--includes legal research on ADA regs and RModifications	Other Motions
5/10/2018	Sarah Colby	0.3	\$950	\$285	Emails with GG/GBW re Title 3 regs for opp to MTD	Other Motions
5/11/2018	Guy Wallace	2.9	\$1,350	\$3,915	preparation and drafting of opposition to D's motion to strike class allegations; legal research and analysis re ascertainability and manageability	Pleadings and Motions Re: Pleadings
5/11/2018	Sarah Colby	4.8	\$950	\$4,560	Drafting/editing opp to MTS--includes LR	Other Motions
5/12/2018	Guy Wallace	4.1	\$1,350	\$5,535	preparation and drafting of opposition to D's motion to strike class allegations	Pleadings and Motions Re: Pleadings
5/12/2018	Sarah Colby	0.4	\$950	\$380	TC Loresia V. re declaration ISO opp to MTC arb	Other Motions
5/12/2018	Sarah Colby	0.2	\$950	\$190	TC GBW re opps to MTS/MTD	Other Motions
5/13/2018	Guy Wallace	3.8	\$1,350	\$5,130	preparation and drafting of opposition to D's MTS class allegations; legal research and analysis re classes certified re multi-facility entities	Pleadings and Motions Re: Pleadings
5/14/2018	Guy Wallace	3.3	\$1,350	\$4,455	preparation and drafting of opposition to D's motion to strike class allegations	Pleadings and Motions Re: Pleadings
5/14/2018	Sarah Colby	0.6	\$950	\$570	Review records, edit LV declaration for opp MTC arb; email to LV re same	Other Motions
5/14/2018	Sarah Colby	3.0	\$950	\$2,850	Drafting opp to MTD (discrimination section)	Other Motions
5/15/2018	Guy Wallace	8.7	\$1,350	\$11,745	preparation and drafting of opposition to D's motion to strike class allegations; com's with SC re same (.6)	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/15/2018	Sarah Colby	0.5	\$950	\$475	Research/review of Brookdale's 12/31/17 10-k	Class Certification
5/15/2018	Sarah Colby	3.4	\$950	\$3,230	Draft equitable abstention arg for opp to MTD	Other Motions
5/15/2018	Sarah Colby	0.2	\$950	\$190	Edits to declaration; email and text LV re same; email GG re same	Other Motions
5/15/2018	Sarah Colby	0.2	\$950	\$190	CW GBW re opp to MTS	Other Motions
5/15/2018	Sarah Colby	0.2	\$950	\$190	CW GBW re opp to MTS and opp to MTD	Other Motions
5/15/2018	Sarah Colby	2.4	\$950	\$2,280	Editing opp to MTD and adding citations to SAC	Other Motions
5/15/2018	Sarah Colby	0.3	\$950	\$285	CW GBW/SM re opps to MTD/MTS and filing plans	Other Motions
5/16/2018	Guy Wallace	7.3	\$1,350	\$9,855	preparation and drafting of opposition to D's motion to strike class allegations; com's with SC re same (.5)	Pleadings and Motions Re: Pleadings
5/16/2018	Guy Wallace	1.1	\$1,350	\$1,485	revise and edit draft of opposition to D's motion to dismiss	Pleadings and Motions Re: Pleadings
5/16/2018	Sarah Colby	2.8	\$950	\$2,660	Edit opp to MTD; email co-co re same; cw GBW re same	Other Motions
5/16/2018	Sarah Colby	0.2	\$950	\$190	Draft/edit RJN; CW GBW re same; email to co-co re same	Other Motions
5/16/2018	Sarah Colby	3.4	\$950	\$3,230	Review/edit/find cites for opp to MTS; multiple CW GBW re same (.3)	Other Motions
5/16/2018	Sarah Colby	0.2	\$950	\$190	Emails with LV re declaration for opp to MTC arb; emails with co-co re same	Other Motions
5/16/2018	Sarah Colby	1.1	\$950	\$1,045	Editing opp to MTD	Other Motions
5/16/2018	Sarah Colby	1.1	\$950	\$1,045	Edit opp to MTD	Other Motions
5/16/2018	Sarah Colby	0.2	\$950	\$190	TC GBW re edits to opp to MTD	Other Motions
5/17/2018	Guy Wallace	5.3	\$1,350	\$7,155	revise and edit opposition to D's motion to strike class allegations	Pleadings and Motions Re: Pleadings
5/17/2018	Guy Wallace	3.6	\$1,350	\$4,860	review and analysis of and revise and edit opposition to D's motion to dismiss; com's with SC re same (.7)	Pleadings and Motions Re: Pleadings
5/17/2018	Sarah Colby	0.8	\$950	\$760	Review opp to mtc arb	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount Description	ProjectName
5/17/2018	Sarah Colby	0.2	\$950	\$190 TC DM/GG re opps to MTC arb and MTD	Pleadings and Motions Re: Pleadings
5/17/2018	Sarah Colby	0.1	\$950	\$95 TC GBW re edits to MTS and MTD opps	Pleadings and Motions Re: Pleadings
5/17/2018	Sarah Colby	2.9	\$950	\$2,755 Editing opp to MTD SAC	Pleadings and Motions Re: Pleadings
5/17/2018	Sarah Colby	2.1	\$950	\$1,995 Cite-check opp to MTS	Pleadings and Motions Re: Pleadings
5/17/2018	Sarah Colby	2.5	\$950	\$2,375 Editing MTS and MTD; Cite-checking and proofign same; preparing for filing; same with RJN	Pleadings and Motions Re: Pleadings
5/22/2018	Sarah Colby	0.2	\$950	\$190 TC GG/GBW re FHAA claims and letter to collection agency	Case Organization, Planning and Strategy
5/25/2018	Sarah Colby	0.1	\$950	\$95 Email from and to Sharon Eidler re family council issues	Case Organization, Planning and Strategy
5/25/2018	Sarah Colby	0.2	\$950	\$190 VM from class member; research prior communications; email to co-co re same	Class Outreach and Contact
6/4/2018	Sarah Colby	0.1	\$950	\$95 Review article re evacuation planning at Bdale/email co-co re same	Case Organization, Planning and Strategy
6/4/2018	Sarah Colby	0.1	\$950	\$95 Review City of Laguna case; email co-co	Class Certification
6/4/2018	Sarah Colby	0.2	\$950	\$190 vm x 3 from putative class members	Class Outreach and Contact
6/6/2018	Sarah Colby	0.2	\$950	\$190 CW Stacy and Sharon re developments	Case Organization, Planning and Strategy
6/7/2018	Sarah Colby	0.1	\$950	\$95 CW SE and SS re developments at BSR and meeting this month	Case Organization, Planning and Strategy
6/7/2018	Sarah Colby	0.1	\$950	\$95 CW GBW re replies to MTS/MTC/MTD	Other Motions
6/13/2018	Sarah Colby	0.1	\$950	\$95 Emails with GG re getting ready for class cert/prepping for hearing	Case Organization, Planning and Strategy
6/14/2018	Guy Wallace	1.1	\$1,350	\$1,485 review and analysis of D's reply briefs re motions on the pleadings	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/17/2018	Guy Wallace	2.3	\$1,350	\$3,105	review and analysis of D's arguments on reply re 12(b)(6) and motion to strike allegations	Pleadings and Motions Re: Pleadings
6/25/2018	Sarah Colby	0.1	\$950	\$95	Research on potential ALF experts	Experts (Including Retention)
6/26/2018	Guy Wallace	1.7	\$1,350	\$2,295	review and analysis of D's motions; draft class cert declarations; com's with GG; DM; SC; GK re same (.6)	Pleadings and Motions Re: Pleadings
6/26/2018	Sarah Colby	1.2	\$950	\$1,140	TC GBW/WM/GG re MTS/MTD/MTC arb--hearing prep (.6); CW GBW re same	Other Motions
6/26/2018	Sarah Colby	2.6	\$950	\$2,470	Review MTS/MTD/MTC arb pre-conf call on hearing prep for these motions--draft list of issues	Other Motions
6/27/2018	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of D's reply briefs re MTD and MTS; preparation for hearing re same	Pleadings and Motions Re: Pleadings
6/27/2018	Sarah Colby	0.5	\$950	\$475	TC Sharon Eidler re case developments	Case Organization, Planning and Strategy
6/27/2018	Sarah Colby	4.5	\$950	\$4,275	Meeting with Stacy re hearing on motions/update on staffing, transporation, activities, falls, access issues	Pleadings and Motions Re: Pleadings
6/28/2018	Guy Wallace	0.5	\$1,350	\$675	com's with SC re preparation for hearing re D's MTD; concept re seeking leave to add FHAA claim	Pleadings and Motions Re: Pleadings
6/28/2018	Sarah Colby	0.1	\$950	\$95	Email from and to SE re developments	Case Organization, Planning and Strategy
6/28/2018	Sarah Colby	0.3	\$950	\$285	CW GBW re ADA claim/FHAA	Pleadings and Motions Re: Pleadings
6/28/2018	Sarah Colby	0.1	\$950	\$95	Email from DM re FHAA/ADA; email from and to SE	Pleadings and Motions Re: Pleadings
7/1/2018	Guy Wallace	1.3	\$1,350	\$1,755	preparation for hearing re D's motions on the pleadings; review and analysis of D's reply re MTD	Pleadings and Motions Re: Pleadings
7/2/2018	Guy Wallace	0.9	\$1,350	\$1,215	preparation for hearing on D's MTD	Pleadings and Motions Re: Pleadings
7/2/2018	Sarah Colby	0.1	\$950	\$95	Emails with SE re updates	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/2/2018	Sarah Colby	0.1	\$950	\$95	TC GBW re MTD hearing	Other Motions
7/2/2018	Sarah Colby	0.5	\$950	\$475	Review Heredia hearing transcript to prep for MTD/MTS/MTC arb hearing before Gilliam; notes re same	Other Motions
7/3/2018	Guy Wallace	3.2	\$1,350	\$4,320	review and analysis of D's MTD; preparation for moot and hearing re same	Pleadings and Motions Re: Pleadings
7/3/2018	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of D's papers re MTD; com's with SC re preparation for hearing re same	Pleadings and Motions Re: Pleadings
7/3/2018	Sarah Colby	0.1	\$950	\$95	TC GBW re MTD hearing	Other Motions
7/3/2018	Sarah Colby	0.6	\$950	\$570	CW GBW re information/citations to FAC/LR he needs for oral argument on MTD	Other Motions
7/5/2018	Guy Wallace	2.3	\$1,350	\$3,105	preparation for moot and hearing re D's motions on the pleadings	Pleadings and Motions Re: Pleadings
7/5/2018	Sarah Colby	5.6	\$950	\$5,320	Review arguments in moving papers/reply on MTD; review FAC for allegations to refute arguments; review cases/states/codes cited; memo on same for GBW for hearing on MTD	Other Motions
7/5/2018	Sarah Colby	0.7	\$950	\$665	TC GBW x 3 re MTD/MTS/MTC arb hearing prep	Other Motions
7/6/2018	Guy Wallace	2.1	\$1,350	\$2,835	conf with GG; BBK; SC re preparation for hearing re D's motions on the pleadings	Pleadings and Motions Re: Pleadings
7/6/2018	Guy Wallace	3.1	\$1,350	\$4,185	preparation of argument notes re hearing on D's motions on the pleadings; com's with SC re same (.5)	Pleadings and Motions Re: Pleadings
7/6/2018	Sarah Colby	2.0	\$950	\$1,900	Moot Court on MTD/MTC arb/MTS class allegations with GG/GBW/BBK	Other Motions
7/6/2018	Sarah Colby	1.2	\$950	\$1,140	Prep, including LR and review of briefs, for Moot court for hearing on MTD/MTS	Other Motions
7/6/2018	Sarah Colby	0.4	\$950	\$380	Review transcript of Gilliam hearing on MTD CLRA claim in Sunrise in prep for MTD hearing; TC GBW re same x 2	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/6/2018	Sarah Colby	0.3	\$950	\$285	Draft memo to GBW re FAC allegations re P&P of u/staffing and Ds knowledge of same	Other Motions
7/8/2018	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of transcript of hearing w/ J. Gilliam re D's motion to dismiss in Sunrise and email from GG re same	Pleadings and Motions Re: Pleadings
7/9/2018	Sarah Colby	0.4	\$950	\$380	Research on industry (staffing and compensation issues) and on Brookdale	Case Organization, Planning and Strategy
7/9/2018	Sarah Colby	0.1	\$950	\$95	Texts with Stacy re food situation at BSR	Case Organization, Planning and Strategy
7/9/2018	Sarah Colby	1.2	\$950	\$1,140	TC Sharon Eidler re MTD/MTS/MTC arb hearing/update on BSR/class members to meet/talk with (1.1); TC GBW re same (.1)	Case Organization, Planning and Strategy
7/9/2018	Sarah Colby	0.1	\$950	\$95	Email GG/GBW/KAS/BBK/BU/DM re discovery to request	Discovery (Non-Deposition)
7/10/2018	Guy Wallace	1.1	\$1,350	\$1,485	preparation for argument re D's motions on the pleadings	Pleadings and Motions Re: Pleadings
7/10/2018	Sarah Colby	2.3	\$950	\$2,185	Research on staffing in assisted living/potential experts	Experts (Including Retention)
7/10/2018	Sarah Colby	0.1	\$950	\$95	Emails from and to SE re hearing; VM from SE re witness/class member	Other Motions
7/11/2018	Guy Wallace	6.2	\$1,350	\$8,370	preparation for hearing and notes re same; D's motions on the pleadings; com's with GG; SC re same (.4)	Pleadings and Motions Re: Pleadings
7/11/2018	Sarah Colby	0.3	\$950	\$285	Review client docs for PCS/BS and send to GBW; CW GBW re MTD and MTS issues for hearing, including PCS and BS/public accommodation	Other Motions
7/11/2018	Sarah Colby	0.4	\$950	\$380	Review pleadings in NY FHAA/ADA lawsuit against ALFs there	Pleadings and Motions Re: Pleadings
7/12/2018	Guy Wallace	4.9	\$1,350	\$6,615	preparation for hearing re D's motions on the pleadings	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/12/2018	Guy Wallace	1.5	\$1,350	\$2,025	hearing with J. Gilliam re D's motions on the pleadings, and com's with co-counsel re results of same	Pleadings and Motions Re: Pleadings
7/12/2018	Sarah Colby	5.0	\$950	\$4,750	attend hearing on MTD/MTS/MTCA; pick up Stacy Stiner and travel to hearing; meeting with co-co before hearing; meeting with GBW after hearing; drop off Stacy at BSR	Other Motions
7/12/2018	Sarah Colby	0.3	\$950	\$285	TC SE re update on hearing	Other Motions
7/13/2018	Sarah Colby	0.1	\$950	\$95	text from and to S. Eidler re resident issue at BSR	Case Organization, Planning and Strategy
7/13/2018	Sarah Colby	0.1	\$950	\$95	Emails with SE re arbitration issues	Other Motions
7/23/2018	Sarah Colby	0.2	\$950	\$190	REview/edit letter to clients re FHAA claim; email co-co re same	Case Organization, Planning and Strategy
7/24/2018	Sarah Colby	1.0	\$950	\$950	Review latest DSS citations against Brookdale facilities; email co-co re same	Discovery (Non-Deposition)
7/25/2018	Sarah Colby	0.1	\$950	\$95	Email re Harrington article re understaffing	Case Organization, Planning and Strategy
7/26/2018	Sarah Colby	0.1	\$950	\$95	CW GBW re class reps	Case Organization, Planning and Strategy
7/26/2018	Sarah Colby	0.8	\$950	\$760	TC Sharon Eidler re cw family member of former B Tracy resident and update on BSR residents' issues	Class Certification
7/27/2018	Sarah Colby	0.2	\$950	\$190	Review SAC re relief requested for class cert analysis; email GBW re same	Class Certification
7/30/2018	Sarah Colby	0.5	\$950	\$475	Review True Health opinion and those cited re affirmative defenses	Class Certification
7/31/2018	Sarah Colby	0.2	\$950	\$190	Review/edit outline for information to obtain for class cert decs	Class Certification
8/1/2018	Sarah Colby	0.1	\$950	\$95	texts with SK re medication missed	Case Organization, Planning and Strategy
8/1/2018	Sarah Colby	0.1	\$950	\$95	LR/DRBA emails re fire doors in ALF	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount Description	ProjectName
8/1/2018	Sarah Colby	0.1	\$950	\$95 REview B. Fountaingrove FC minutes for discovery request ideas	Discovery (Non-Deposition)
8/2/2018	Sarah Colby	0.1	\$950	\$95 Emails with GBw re MTD/MTC/MTS	Other Motions
8/3/2018	Sarah Colby	0.2	\$950	\$190 Research on sales of Brookdale communities; email to co-co re same	Class Certification
8/8/2018	Sarah Colby	0.8	\$950	\$760 TC SE re update on FC meeting/developments at BSR/potential witnesses	Case Organization, Planning and Strategy
8/14/2018	Sarah Colby	0.5	\$950	\$475 Review DSS records for class cert prep	Class Certification
8/18/2018	Sarah Colby	0.1	\$950	\$95 Emails with C. Becker re meeting; email with gBW re same	Case Organization, Planning and Strategy
9/4/2018	Sarah Colby	0.1	\$950	\$95 Emails from and to GG re potential amendment to complaint/declarations	Case Organization, Planning and Strategy
9/4/2018	Sarah Colby	0.2	\$950	\$190 Email from DSS re change of facility ownership; email co-co re same; emails with KAS re same/motions	Class Certification
9/17/2018	Sarah Colby	0.4	\$950	\$380 TC GG/KAS/BU/GK/JY re changes in ownership/getting DSS records/getting class member-witness declarations	Class Certification
9/17/2018	Sarah Colby	0.6	\$950	\$570 Research on CHOWs at Brookdale via DSS records	Class Certification
9/18/2018	Sarah Colby	1.2	\$950	\$1,140 REview/edit draft declarations ISO class cert for Joan Carlson/Ellen Hoppe; review/edit declaration template; email co-co re same	Class Certification
9/18/2018	Sarah Colby	0.2	\$950	\$190 CW GBW re class cert declarations/arbitration issue	Class Certification
9/18/2018	Sarah Colby	0.2	\$950	\$190 LR on commonality for class declarations	Class Certification
9/21/2018	Sarah Colby	0.3	\$950	\$285 TC Sharon re potential class rep/witness	Class Certification
9/26/2018	Sarah Colby	0.1	\$950	\$95 Email with SE re contacting potential class rep	Class Outreach and Contact
10/1/2018	Sarah Colby	0.1	\$950	\$95 Emails re death of class member/need to amend complaint	Case Organization, Planning and Strategy
10/4/2018	Sarah Colby	0.1	\$950	\$95 Emails with SE re contacting BSR resident	Class Outreach and Contact
10/12/2018	Sarah Colby	0.1	\$950	\$95 Emails with KAS/GK/BU re contacting class rep	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount Description	ProjectName
10/15/2018	Sarah Colby	0.1	\$950	\$95 Texts with Stacy re staffing issues at BSR	Case Organization, Planning and Strategy
10/15/2018	Sarah Colby	0.1	\$950	\$95 Texts with Sharon; LM Sharon re update	Case Organization, Planning and Strategy
10/19/2018	Sarah Colby	0.1	\$950	\$95 Email to SE re status update	Case Organization, Planning and Strategy
10/23/2018	Sarah Colby	0.1	\$950	\$95 Emails with Sharon re updates	Case Organization, Planning and Strategy
10/23/2018	Sarah Colby	1.0	\$950	\$950 TC Sharon re potential class representatives/declarations/update on BSR	Class Outreach and Contact
10/23/2018	Sarah Colby	0.2	\$950	\$190 Email to BU re Sheerhan; edit record request for Sheerhan and send to BU	Class Outreach and Contact
10/23/2018	Sarah Colby	0.1	\$950	\$95 Email from and to GG re current resident issues/potential motion re same	Other Motions
10/24/2018	Sarah Colby	0.2	\$950	\$190 Review notes and draft memo re outstanding itesm	Case Organization, Planning and Strategy
10/24/2018	Sarah Colby	0.3	\$950	\$285 TC GG re potential TRO for resident WC user and disability discrimination at Westminster facility	Other Motions
10/24/2018	Sarah Colby	0.1	\$950	\$95 CW GBW re prelim injunction motion/CW GG re same	Other Motions
11/12/2018	Sarah Colby	0.1	\$950	\$95 Emails with SE re family council meeting	Case Organization, Planning and Strategy
11/15/2018	Sarah Colby	0.1	\$950	\$95 CW GBW re cw clients re transition/contacts	Case Organization, Planning and Strategy
12/11/2018	Sarah Colby	0.3	\$950	\$285 TC GG re transferring case/contact with class members	Case Organization, Planning and Strategy
12/14/2018	Sarah Colby	0.1	\$950	\$95 Email to co-co re contacts with class members/ reps	Case Organization, Planning and Strategy
12/26/2018	Sarah Colby	0.1	\$950	\$95 Emails to co-co re contacts with class reps	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/10/2019	Travis Close	0.3	\$850	\$255	Call w/ Sharon Eidler re: adding new class rep	Case Organization, Planning and Strategy
1/10/2019	Travis Close	0.4	\$850	\$340	Review notes from meeting with co-counsel following call from Client	Case Organization, Planning and Strategy
1/16/2019	Travis Close	0.2	\$850	\$170	Prepare/revise notice of appearance	Other Motions
1/17/2019	Travis Close	0.5	\$850	\$425	Research whether an attorney has a duty to inform the court of a plaintiff's death	Case Organization, Planning and Strategy
1/23/2019	Guy Wallace	0.4	\$1,350	\$540	com's with Eidler re potential additional class representative	Case Organization, Planning and Strategy
1/25/2019	Guy Wallace	1.1	\$1,350	\$1,485	com's with GG; SC; MTJ re Court's Order denying D's pleading challenges and preparation of CMC and plan for discovery	Case Management Conferences
1/25/2019	Guy Wallace	1.3	\$1,350	\$1,755	review and analysis of Order denying D's MTD; MTS; MCA	Pleadings and Motions Re: Pleadings
1/25/2019	Travis Close	0.4	\$850	\$340	Review Judge's order denying motion to compel arbitration, granting motion to dismiss in part,	Case Organization, Planning and Strategy
1/26/2019	Guy Wallace	1.1	\$1,350	\$1,485	preparation and drafting of CMC statement	Case Management Conferences
1/27/2019	Guy Wallace	3.8	\$1,350	\$5,130	preparation and drafting of CMC statement	Case Management Conferences
1/28/2019	Guy Wallace	0.9	\$1,350	\$1,215	com's with GG; MTJ re CMC statement and proposed case schedule	Case Management Conferences
1/28/2019	Mark Johnson	0.3	\$1,150	\$345	review draft of P's section of joint CMC Statement	Case Management Conferences
1/28/2019	Mark Johnson	0.8	\$1,150	\$920	review and analysis of decision on MTD, MTS and mtn to compel arbitration	Other Motions
1/28/2019	Travis Close	0.3	\$850	\$255	Review GBW's draft joint CMC statement	Case Organization, Planning and Strategy
1/29/2019	Guy Wallace	1.5	\$1,350	\$2,025	conf with GG; BBK; JY; SC; MTJ; TCC re CMC Statement; discovery	Case Management Conferences

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/29/2019	Guy Wallace	0.7	\$1,350	\$945	revise and edit draft CMC statement; com with OC re same	Case Management Conferences
1/29/2019	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ; AML re discovery and ESI	Discovery (Non-Deposition)
1/29/2019	Mark Johnson	1.4	\$1,150	\$1,610	team meeting to discuss joint CMS, meeting and conferring with D's, further discovery, case schedule, potential experts, document managment and review	Case Organization, Planning and Strategy
1/29/2019	Mark Johnson	0.4	\$1,150	\$460	mtg w/ GBW, TC, AML re document managment and review; relativity access; document production by P's, scope of likely production by Ds	Case Organization, Planning and Strategy
1/29/2019	Travis Close	2.0	\$850	\$1,700	Meet w/ GBW, MTJ, and co-counsel re: strategy for next steps in litigation: CMC, initial disclosures/discovery doc management, class cert prep	Case Organization, Planning and Strategy
1/29/2019	Travis Close	0.4	\$850	\$340	Call w/ Sharon Eidler re: clarification of motion to compel arbitration with respect to other residents; take notes of call summary and next steps	Case Organization, Planning and Strategy
1/29/2019	Travis Close	0.3	\$850	\$255	Meet w/ GBW re: whether residents who signed earlier arbitration agreement are still subject to arbitration; review order on MTD for application for facts w/ respect to H. Carlson	Case Organization, Planning and Strategy
1/30/2019	Guy Wallace	0.5	\$1,350	\$675	com's with SC re potential class representatives and outreach re same	Class Certification
2/1/2019	Guy Wallace	1.8	\$1,350	\$2,430	review and analysis of D's draft portion of CMC statement; legal research and analysis re scope of discovery re class certification and merits	Case Management Conferences
2/1/2019	Travis Close	0.2	\$850	\$170	Review Defendants ' proposed section of CMC statement to analyze expected discovery issues	Case Organization, Planning and Strategy
2/4/2019	Guy Wallace	1.1	\$1,350	\$1,485	prepare for and participate in meet and confer with D's re Joint CMC statement	Case Management Conferences

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/4/2019	Guy Wallace	0.9	\$1,350	\$1,215	legal research and analysis re potential application of General Order 56 herein	Case Management Conferences
2/4/2019	Guy Wallace	2.7	\$1,350	\$3,645	preparation and drafting of Joint CMC statement	Case Management Conferences
2/4/2019	Mark Johnson	0.1	\$1,150	\$115	pre-call w/ GBW re ESI preservation and other issues for conference w/ OC re CMC statement	Case Management Conferences
2/4/2019	Mark Johnson	0.2	\$1,150	\$230	pre-call w/ COC GBW and GG, others to plan for conference call w/ OC on CMC statement	Case Management Conferences
2/4/2019	Mark Johnson	0.5	\$1,150	\$575	meet and confer call w/ OC re differences on positions for CMC statement	Case Management Conferences
2/4/2019	Mark Johnson	0.5	\$1,150	\$575	review D's sections for CMC statement; review standing order, ESI guidelines and checklist for call w/ OC	Case Management Conferences
2/5/2019	Guy Wallace	2.3	\$1,350	\$3,105	revise and edit CMC statement; com's with OC and co-counsel re same	Case Management Conferences
2/8/2019	Guy Wallace	0.7	\$1,350	\$945	com's with GG; MTJ re preparation for CMC; response re D's proposal for interlocutory appeal	Case Management Conferences
2/11/2019	Guy Wallace	3.3	\$1,350	\$4,455	review and analysis of D's arguments re interlocutory appeal; G.O 56; potential request for stay pending appeal; com's with GG re preparation for CMC (.4)	Case Management Conferences
2/11/2019	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW re D's proposed interlocutory appeal and authority/arguments in opposition to same	Case Organization, Planning and Strategy
2/11/2019	Travis Close	0.1	\$850	\$85	Review strategy by GCG to add new plaintiff in southern CA via 3rd amended complaint	Case Organization, Planning and Strategy
2/11/2019	Travis Close	0.1	\$850	\$85	Call w/ GBW re: preparation for CMC conference	Case Organization, Planning and Strategy
2/12/2019	Guy Wallace	2.7	\$1,350	\$3,645	prepare for and attend Initial CMC; com's with GG; TCC re results of same	Case Management Conferences
2/12/2019	Travis Close	0.1	\$850	\$85	Review requirements for FRCP Rule 26(f)	Case Management Conferences

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/12/2019	Travis Close	0.4	\$850	\$340	Print out/review CMC statement, Ps FAC, judge's recent order, in prep for CMC at 2:00pm	Case Organization, Planning and Strategy
2/12/2019	Travis Close	0.3	\$850	\$255	Email to JY (co-counsel) re: collaborating on rule 26 initial disclosures	Case Organization, Planning and Strategy
2/12/2019	Travis Close	0.9	\$850	\$765	Research Rule 26(a)(1) and secondary sources on initial disclosures; confer w/ MSL re: how to disclose damages calculations	Discovery (Non-Deposition)
2/13/2019	Travis Close	0.2	\$850	\$170	Review Judge's CMC order and GCG's notes regarding the order	Case Organization, Planning and Strategy
2/13/2019	Travis Close	0.4	\$850	\$340	Review Federal Practice and Procedure's guidance on Initial Disclosures	Case Organization, Planning and Strategy
2/13/2019	Travis Close	0.6	\$850	\$510	Meet w/ AML to discuss document procedures for initial disclosures	Case Organization, Planning and Strategy
2/13/2019	Travis Close	1.0	\$850	\$850	Continue indexing client files for initial disclosures	Discovery (Non-Deposition)
2/13/2019	Travis Close	1.0	\$850	\$850	Continue indexing client files for initial disclosures	Discovery (Non-Deposition)
2/13/2019	Travis Close	1.0	\$850	\$850	Continue indexing client files for initial disclosures	Discovery (Non-Deposition)
2/14/2019	Guy Wallace	0.9	\$1,350	\$1,215	prepare for and participate in tc with GG; JY; MTJ; TC; AML re initial disclosures; document production; Rule 26(f) conference	Case Organization, Planning and Strategy
2/14/2019	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of 3AC and revisions re same; com's with JY re same	Pleadings and Motions Re: Pleadings
2/14/2019	Travis Close	0.3	\$850	\$255	Meet w/ GBW re: requirements for initial disclosures	Case Organization, Planning and Strategy
2/14/2019	Travis Close	1.0	\$850	\$850	call re: initial disclosures, planning for the rule 26(f) conference, and discovery protocol	Case Organization, Planning and Strategy
2/14/2019	Travis Close	0.5	\$850	\$425	Look up previous Unruh Act initial disclosures from our firm; quote damages section; draft list of types of docs for our initial disclosures and send to JY in email	Case Organization, Planning and Strategy
2/14/2019	Travis Close	0.5	\$850	\$425	Review redlined third amended complaint from JY; additions of P and updates to deceased	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/19/2019	Travis Close	0.6	\$850	\$510	Call/voicemail from client/plaintiff Stacia Steiner; review allegations and facts with respect to Steiner; call back	Case Organization, Planning and Strategy
2/21/2019	Guy Wallace	0.3	\$1,350	\$405	com's with Defendants; GG re selection of MJ for discovery; possible early mediation and selection of mediator re same	Case Organization, Planning and Strategy
2/22/2019	Guy Wallace	0.2	\$1,350	\$270	revise and edit submission to Court re selection of MJ for discovery; com's with GG re same and briefing schedule re D's request for certification of ADA issues	Discovery (Non-Deposition)
2/22/2019	Travis Close	0.6	\$850	\$510	Initial draft of proposed stipulation re: magistrate judge for discovery proceedings	Case Organization, Planning and Strategy
2/22/2019	Travis Close	0.4	\$850	\$340	Draft joint submissio re: choosing magistrate judge	Case Organization, Planning and Strategy
2/22/2019	Travis Close	0.6	\$850	\$510	Draft damages analysis for PNC Maria Espinoza	Case Organization, Planning and Strategy
2/25/2019	Guy Wallace	0.4	\$1,350	\$540	com's with Barker; GG re D's request for certification of ADA issue for appellate review	Appeal
2/26/2019	Guy Wallace	0.6	\$1,350	\$810	review and analysis of D's various interlocutory appeals; com's with GG; MTJ re same	Appeal
2/26/2019	Mark Johnson	0.5	\$1,150	\$575	review and analyze D's motoin for stay of proceedings pending appeal of arbitration motion.	Other Motions
2/26/2019	Travis Close	1.4	\$850	\$1,190	Review initial disclosures; names included for each class memeber and our client files for each; types of documents listed; research executive director of Brookdale Tracy	Case Organization, Planning and Strategy
2/27/2019	Guy Wallace	0.7	\$1,350	\$945	revise and edit draft of initial disclosures; com's with Barker; APK; GG; MTJ re schedule re same and Rule 26(f) conference	Case Organization, Planning and Strategy
2/27/2019	Guy Wallace	0.4	\$1,350	\$540	com's with GG re D's recent motions for stays; certification of issue re ADA	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/27/2019	Mark Johnson	0.3	\$1,150	\$345	mtg w/ Travis to discuss researeching and drafting opposition to motion to stay proceeding pending appeal of arbitration ruling and analysis of and strategyh for same	Other Motions
2/27/2019	Travis Close	0.2	\$850	\$170	Meet w/ MTJ re: reaerch on opposition to Ds appeal of denial of arbitration	Case Organization, Planning and Strategy
2/27/2019	Travis Close	0.3	\$850	\$255	Begin outlining analysis for opposition to motion to stay after discussion with MTJ	Case Organization, Planning and Strategy
2/27/2019	Travis Close	1.2	\$850	\$1,020	Read Def's MPA iso: motion to stay proceedings and begin articulating response	Case Organization, Planning and Strategy
2/27/2019	Travis Close	0.4	\$850	\$340	Continue analysis of responding to motion to stay: Ds harm, Ps harm articulated; cite-check Ds cases	Case Organization, Planning and Strategy
2/27/2019	Travis Close	0.2	\$850	\$170	Meet w/ MTJ re: assisting GBW with interlocutory appeal for ADA claim applied to assied living facilities	Case Organization, Planning and Strategy
2/27/2019	Travis Close	0.5	\$850	\$425	Analyze/compare arguments made in Ds mtn to dismiss re: ADA not applying to their facilities WITH arguments in appeal motion	Case Organization, Planning and Strategy
2/27/2019	Travis Close	1.2	\$850	\$1,020	Analyze/compare arguments made by Ds in MTD re: ADA not covering assisted living facilities to their arguments to the same in motion to certify order for interloc appeal	Case Organization, Planning and Strategy
2/28/2019	Guy Wallace	0.4	\$1,350	\$540	com's with OC; GG; MTJ re D's proposed extension re Answer and initial disclosures; issue re Rule 26(f) conference	Discovery (Non-Deposition)
3/1/2019	Guy Wallace	0.4	\$1,350	\$540	review and analysis of transcript of 2/12 CMC; com's with co-counsel re same	Discovery (Non-Deposition)
3/3/2019	Mark Johnson	0.2	\$1,150	\$230	talk to AML re document coding protocol, meeting on Monday	Case Organization, Planning and Strategy
3/4/2019	Mark Johnson	0.3	\$1,150	\$345	mtgs (x2) w/ AML re document coding panel and plans for training with doc coders	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/4/2019	Mark Johnson	0.9	\$1,150	\$1,035	mtg/call w/ COC re document coding and strategy, development of coding panel	Case Organization, Planning and Strategy
3/4/2019	Travis Close	1.6	\$850	\$1,360	Document review protocol meeting (relativity, issue tags, client production, etc) w/ AML, MTJ, and co-counsel	Case Organization, Planning and Strategy
3/4/2019	Travis Close	0.3	\$850	\$255	Review transcript of CMC conference to determine Judge Gilliam's orders re: rule 26(f) conference and magistrate judge	Case Organization, Planning and Strategy
3/5/2019	Mark Johnson	0.2	\$1,150	\$230	review and analysis of D's initial disclosures	Discovery (Non-Deposition)
3/6/2019	Travis Close	0.3	\$850	\$255	Review draft motion for admin relief to compel rule 26(f) conference by GCG	Case Organization, Planning and Strategy
3/12/2019	Travis Close	0.4	\$850	\$340	Review Ps opposition to Ds motion to stay	Case Organization, Planning and Strategy
3/13/2019	Guy Wallace	1.3	\$1,350	\$1,755	preparation for discovery conference	Discovery (Non-Deposition)
3/13/2019	Guy Wallace	1.8	\$1,350	\$2,430	review and analysis of P's RFPs; preparation for tc with GG; JY; MTJ re discovery issues and conference with MJ Beeler	Discovery (Non-Deposition)
3/14/2019	Guy Wallace	3.6	\$1,350	\$4,860	prepare for and participate in discovery conference with MJ Beeler; com's with co-counsel re results of same; review and analysis of Order re same	Discovery (Non-Deposition)
3/14/2019	Mark Johnson	0.7	\$1,150	\$805	appearance before MJ Beeler re discovery plan	Case Management Conferences
3/14/2019	Mark Johnson	1.4	\$1,150	\$1,610	travel to and from discovery conference w/ Judge Beeler.	Case Management Conferences
3/14/2019	Mark Johnson	1.2	\$1,150	\$1,380	in court meet and cofer with opposing counesl	Discovery (Non-Deposition)
3/18/2019	Guy Wallace	3.4	\$1,350	\$4,590	preparation and drafting of P's opposition to D's motion to certify issues for appeal; motion to stay	Other Motions
3/19/2019	Guy Wallace	2.2	\$1,350	\$2,970	review and analysis of D's motion to certify appeal; legal research and analysis re same	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/19/2019	Guy Wallace	4.5	\$1,350	\$6,075	preparation and drafting of opposition to D's motion to certify issue for appeal; motion for stay; legal research and analysis re same	Other Motions
3/19/2019	Mark Johnson	0.3	\$1,150	\$345	com w/ GBW re arguments in opp to certification for interlocutory appeal and possible stay application; possible mtn for leave to amend to add 504 claim.	Other Motions
3/20/2019	Guy Wallace	2.7	\$1,350	\$3,645	preparation and drafting of opposition to D's request to certify issue and motion to stay	Other Motions
3/20/2019	Mark Johnson	0.1	\$1,150	\$115	review and respond to COC GG re strategy for 2nd wave of discovery, custodians and search terms	Discovery (Non-Deposition)
3/20/2019	Mark Johnson	0.2	\$1,150	\$230	mtg w/ Travis Close re research project on factual and legal basis for potential 504 claim	Misc. Research
3/21/2019	Guy Wallace	1.7	\$1,350	\$2,295	legal research and analysis re requirements of Section 1292(b)	Other Motions
3/21/2019	Guy Wallace	7.6	\$1,350	\$10,260	preparation and drafting of opposition to D's motion to certify appeal and to stay	Other Motions
3/21/2019	Travis Close	0.4	\$850	\$340	Continue drafting memo iso Rehab Act claim: cases finding that Medicare/Medicaid is subject to s. 504	Case Organization, Planning and Strategy
3/22/2019	Guy Wallace	5.4	\$1,350	\$7,290	preparation and drafting of opposition to D's motion to certify issue for appeal; motion to stay; legal research and analysis re same	Other Motions
3/22/2019	Guy Wallace	0.5	\$1,350	\$675	com's with JY; TCC re short term stays at Brookdale and review and analysis of materials re same	Other Motions
3/22/2019	Travis Close	1.0	\$850	\$850	Draft declaration for GBW iso Ps opposition to Ds motion to certify order for interloc appeal	Appeal
3/22/2019	Travis Close	1.0	\$850	\$850	Continue drafting Rehab Act claim memo (cases finding medicare/medicaid are federal financial assistance)	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/22/2019	Travis Close	1.0	\$850	\$850	Continue drafting Rehab Act claim memo (cases finding medicare/medicaid are federal financial assistance)	Case Organization, Planning and Strategy
3/22/2019	Travis Close	0.1	\$850	\$85	CALL w/ GBW re: updating 9th circuit statistics for timing of decisions for appellate brief	Case Organization, Planning and Strategy
3/22/2019	Travis Close	0.5	\$850	\$425	Research short-term / respite stay options available at Brookdale from website for GBW's appellate opp brief	Case Organization, Planning and Strategy
3/22/2019	Travis Close	0.8	\$850	\$680	Edits to GBW dec iso Ps opp to mot to cert interloc appeal (adding website evidence of Brookdale's short term stay policies)	Case Organization, Planning and Strategy
3/22/2019	Travis Close	1.0	\$850	\$850	Doc review, Ps initial productions, # CTRL0000679-CTRL0000694 (1-17 of 200)	Discovery (Non-Deposition)
3/22/2019	Travis Close	0.7	\$850	\$595	Doc review, Ps initial productions, # CTRL0000694-CTRL0000704 (17-27 of 200)	Discovery (Non-Deposition)
3/23/2019	Guy Wallace	6.7	\$1,350	\$9,045	preparation and drafting of opposition to D's motion to certify issue for interlocutory appeal and motion to stay	Other Motions
3/24/2019	Guy Wallace	1.2	\$1,350	\$1,620	legal research and analysis re coverage of assisted living facilities under ADA	Other Motions
3/24/2019	Guy Wallace	3.3	\$1,350	\$4,455	revise and edit opposition to D's motion to certify issue for appeal; motion to stay; incorporate citations to TAC	Other Motions
3/24/2019	Mark Johnson	1.0	\$1,150	\$1,150	review and edit draft of opposition to mtn to certify decision on ADA coverage for interlocutory appeal.	Other Motions
3/25/2019	Guy Wallace	0.7	\$1,350	\$945	revise and edit opposition to D's motion to certify appeal	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/25/2019	Guy Wallace	4.2	\$1,350	\$5,670	revise and edit opposition to D's motion to certify issue for appeal and motion to stay; revise and edit GBW declaration re same; revise and edit RJN re same; com's with MTJ; TCC re same (.5)	Other Motions
3/25/2019	Mark Johnson	1.8	\$1,150	\$2,070	draft proposed ESI stipulation with modifications to model order; review and incorporate attachment re ESI production format	Discovery (Non-Deposition)
3/25/2019	Mark Johnson	1.2	\$1,150	\$1,380	review protective order templates and incorporate language from model order into protective order, consider alternative language.	Discovery (Non-Deposition)
3/25/2019	Mark Johnson	0.3	\$1,150	\$345	emails (x2) to COC re protective order and ESI stipulation, analysis of same and strategy for communication w/ OC re same.	Discovery (Non-Deposition)
3/25/2019	Travis Close	0.3	\$850	\$255	Review draft by GBW of Ps opposition to Ds motion to certify interloc appeal	Case Organization, Planning and Strategy
3/25/2019	Travis Close	0.7	\$850	\$595	Draft request for judicial notice iso Ps Opp to Ds Mot to Cer Interloc Appeal	Case Organization, Planning and Strategy
3/25/2019	Travis Close	1.0	\$850	\$850	Research how government and public websites can be judicially noticed	Case Organization, Planning and Strategy
3/25/2019	Travis Close	1.1	\$850	\$935	Continue researching how websites maintain by defendants can be judicially noticed; add briefing to RJN	Case Organization, Planning and Strategy
3/25/2019	Travis Close	0.7	\$850	\$595	Revise draft dec and RJN iso Ps opp to Ds mot to cert interloc appear	Case Organization, Planning and Strategy
3/25/2019	Travis Close	0.4	\$850	\$340	Draft proposed order granting judicial notice	Case Organization, Planning and Strategy
3/25/2019	Travis Close	1.0	\$850	\$850	Doc review, Ps initial productions, # CTRL0000704-CTRL0000718 (27-42 of 200)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/25/2019	Travis Close	0.7	\$850	\$595	Doc review, Ps initial productions, # CTRL0000718-CTRL0000729 (42-54 of 200)	Discovery (Non-Deposition)
3/26/2019	Travis Close	1.0	\$850	\$850	Continue drafting memo (residential facilities covered under section 504)	Case Organization, Planning and Strategy
3/26/2019	Travis Close	1.0	\$850	\$850	Continue drafting memo (residential facilities covered under section 504)	Case Organization, Planning and Strategy
3/26/2019	Travis Close	0.3	\$850	\$255	Draft email to team and co-counsel re: redaction policies for initial production	Case Organization, Planning and Strategy
3/26/2019	Travis Close	1.0	\$850	\$850	Doc review, Ps initial productions, # CTRL0000729-CTRL0000746 (54-72 of 200)	Discovery (Non-Deposition)
3/27/2019	Guy Wallace	1.6	\$1,350	\$2,160	legal research and analysis re CLRA claims and damages that have not yet manifested and class certification	Class Certification
3/27/2019	Mark Johnson	0.7	\$1,150	\$805	make final revisions to proposed protective order and ESI stipulation (.5); draft email to OC re same and re invitation to meet and confer (.2)	Discovery (Non-Deposition)
3/27/2019	Mark Johnson	1.1	\$1,150	\$1,265	review and analyze TCC research memo re applicability of Section 504 of rehab act; com w/ GBW (.1) re same.	Other Motions
3/27/2019	Travis Close	1.0	\$850	\$850	Doc review, Ps initial productions, # CTRL0000746-CTRL0000761 (72-88 of 200)	Discovery (Non-Deposition)
3/27/2019	Travis Close	1.0	\$850	\$850	Doc review, Ps initial productions, # CTRL0000761-CTRL0000777 (88-104 of 200)	Discovery (Non-Deposition)
3/27/2019	Travis Close	1.0	\$850	\$850	Doc review, Ps initial productions, # CTRL0000777-CTRL0000789 (104-117 of 200)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/27/2019	Travis Close	1.0	\$850	\$850	Doc review, Ps initial productions, # CTRL0000789-CTRL0000800 (117-130 of 200)	Discovery (Non-Deposition)
3/27/2019	Travis Close	0.9	\$850	\$765	Doc review, Ps initial productions, # CTRL0000800-CTRL0000823 (130-153 of 200)	Discovery (Non-Deposition)
3/28/2019	Travis Close	1.0	\$850	\$850	Doc review, Ps initial productions, # CTRL0000823-CTRL0000851 (153-176 of 200)	Discovery (Non-Deposition)
3/28/2019	Travis Close	1.0	\$850	\$850	Doc review, Ps initial productions, # CTRL0000851-CTRL0000864 (176-190 of 200)	Discovery (Non-Deposition)
3/28/2019	Travis Close	0.7	\$850	\$595	Doc review, Ps initial productions, # CTRL0000864-CTRL0000874 (190-200 of 200)	Discovery (Non-Deposition)
3/28/2019	Travis Close	0.4	\$850	\$340	Mark intitial production batch for confidentiality -- # CTRL0000679-CTRL0000727 (1-50 of 200)	Discovery (Non-Deposition)
3/29/2019	Guy Wallace	0.5	\$1,350	\$675	com's with GG; JY; SC re current problems for class representatives; discovery	Case Organization, Planning and Strategy
3/29/2019	Travis Close	1.0	\$850	\$850	Check initial batch for SSNs/ confidentiality -- # CTRL0000727-CTRL0000790 (50-114 of 200)	Discovery (Non-Deposition)
3/29/2019	Travis Close	0.5	\$850	\$425	Check initial batch for SSNs/ confidentiality -- # CTRL0000790-CTRL0000874 (114-200 of 200)	Discovery (Non-Deposition)
4/2/2019	Mark Johnson	0.3	\$1,150	\$345	email exchanges w/ OC (x2) and COC re scheduling ESI conference, obtaining documents beforehand and status of protective order	Discovery (Non-Deposition)
4/5/2019	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ; AMA re e-discovery	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/5/2019	Mark Johnson	0.2	\$1,150	\$230	coms w/ COC and AML re document coding sheet revisions to add list of facilities.	Discovery (Non-Deposition)
4/5/2019	Mark Johnson	0.1	\$1,150	\$115	draft email to OC re ESI call and information for same	Discovery (Non-Deposition)
4/5/2019	Mark Johnson	0.8	\$1,150	\$920	meet and confer w/ OC and COC Yellin re ESI, protective order	Discovery (Non-Deposition)
4/5/2019	Mark Johnson	0.2	\$1,150	\$230	follow up conference w/ TCC, AML following meet and confer w/OC re next steps	Discovery (Non-Deposition)
4/5/2019	Mark Johnson	0.9	\$1,150	\$1,035	review ESI guidelines, checklist and draft stipulation for meet and confer call w/ OC.	Discovery (Non-Deposition)
4/5/2019	Mark Johnson	0.1	\$1,150	\$115	follow-up email with OC re ESI protocol with Word draft of Ex A concernng format of document production	Discovery (Non-Deposition)
4/5/2019	Mark Johnson	0.1	\$1,150	\$115	email exchange w/ COC GG re ESI call, additional discovery.	Discovery (Non-Deposition)
4/5/2019	Travis Close	0.8	\$850	\$680	Call with JY, AMA,, MTJ and opposing counsel re: ESI systems used by brookdale	Case Organization, Planning and Strategy
4/5/2019	Travis Close	0.6	\$850	\$510	Post-call meeting with AMA, MTJ re: strategy for getting ESI from defendants	Case Organization, Planning and Strategy
4/5/2019	Travis Close	0.3	\$850	\$255	Locate files revealing Brookdale's systems/software	Discovery (Non-Deposition)
4/8/2019	Mark Johnson	0.3	\$1,150	\$345	call w/ OC Kopczynski re ESI stip and protective order, document production, responses to RPDs; production of list of communities; follow up emails re same.	Discovery (Non-Deposition)
4/8/2019	Travis Close	1.0	\$850	\$850	Continue investigating types of software used by Brookdale	Case Organization, Planning and Strategy
4/8/2019	Travis Close	0.6	\$850	\$510	Finish researching Brookdale's systems and software and email to MTJ	Case Organization, Planning and Strategy
4/8/2019	Travis Close	1.0	\$850	\$850	Continue locating files revealing Brookdale's systems/software	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/9/2019	Mark Johnson	0.4	\$1,150	\$460	review D's revised draft of protective order; review FRE provision re privilege related to same	Discovery (Non-Deposition)
4/9/2019	Mark Johnson	0.5	\$1,150	\$575	draft email to COC with comments, proposed response on D's revisions to protective Order; draft email to OC re position.	Discovery (Non-Deposition)
4/10/2019	Guy Wallace	0.5	\$1,350	\$675	review and analysis of draft class cert declarations; revise and edit same	Class Certification
4/11/2019	Guy Wallace	1.1	\$1,350	\$1,485	com's with GG; MTJ; TC: AML re discovery, RFPs and document review	Discovery (Non-Deposition)
4/11/2019	Mark Johnson	0.7	\$1,150	\$805	locate and review notes from 26(f) conference prep re priority discovery items; mtg w/ GBW re 2nd set of RPDs and strategy for same	Discovery (Non-Deposition)
4/11/2019	Mark Johnson	1.3	\$1,150	\$1,495	research re inclusion in protective orders for FRE 602(d) order re privileged informaiton, including survey of ND Cal. cases, review of Sedona principals commentary	Discovery (Non-Deposition)
4/11/2019	Mark Johnson	0.4	\$1,150	\$460	reivew and draft response to OC re protective order and inclusion of blanket non-waiver of privilege provision	Discovery (Non-Deposition)
4/11/2019	Mark Johnson	0.3	\$1,150	\$345	email exchanges w/ COC re D's position on protective order and ESI privilege issue, strategy for responding to same.	Discovery (Non-Deposition)
4/11/2019	Mark Johnson	0.1	\$1,150	\$115	review and respond to emails re proposed changes in document coding protocol	Discovery (Non-Deposition)
4/11/2019	Travis Close	0.8	\$850	\$680	Begin 1st QC batch of doc review and email team additional coding suggestions	Discovery (Non-Deposition)
4/11/2019	Travis Close	0.8	\$850	\$680	Meet w/ AML, GBW re: coding categories for Brookdale doc review	Discovery (Non-Deposition)
4/12/2019	Guy Wallace	0.4	\$1,350	\$540	com's with GG; MTJ re written discovery and site inspections	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/15/2019	Travis Close	0.2	\$850	\$170	Meet w/ AML re: reappropriation of Ps initial production batch	Discovery (Non-Deposition)
4/16/2019	Travis Close	1.0	\$850	\$850	Review of Ps initial productions -- CTRL0000579-CTRL0000594 (1-16 of 100)	Discovery (Non-Deposition)
4/17/2019	Mark Johnson	0.3	\$1,150	\$345	coms (x2) w/ AML re management and status of new document production from D's, change in coding protocol to address same	Discovery (Non-Deposition)
4/17/2019	Travis Close	1.0	\$850	\$850	Review of Ps initial productions -- CTRL0000601-CTRL0000612 (23-35 of 100)	Case Organization, Planning and Strategy
4/17/2019	Travis Close	1.0	\$850	\$850	Review of Ps initial productions -- CTRL0000612-CTRL0000628 (35-51 of 100)	Discovery (Non-Deposition)
4/17/2019	Travis Close	1.0	\$850	\$850	Review of Ps initial productions -- CTRL0000628-CTRL0000650 (51-73 of 100)	Discovery (Non-Deposition)
4/17/2019	Travis Close	1.0	\$850	\$850	Review of Ps initial productions -- CTRL0000650-CTRL0000670 (73-93 of 100)	Discovery (Non-Deposition)
4/18/2019	Travis Close	1.0	\$850	\$850	Finish reviewing batch of Ps initial productions # CTRL0000670-CTRL0000678 (93-100 of 100) and mark for confidentiality all docs in batch	Discovery (Non-Deposition)
4/23/2019	Mark Johnson	0.4	\$1,150	\$460	mtg w/ TCC re preparation of 2nd document requests and site inspection notices,	Discovery (Non-Deposition)
4/23/2019	Mark Johnson	0.1	\$1,150	\$115	mtg w/ ELS re creation of tracking mechanism for D's responses to document requests	Discovery (Non-Deposition)
4/23/2019	Travis Close	0.2	\$850	\$170	Meet with MTJ re: drafting pioneer discovery and notice of inspection	Case Organization, Planning and Strategy
4/23/2019	Travis Close	1.3	\$850	\$1,105	Begin second set of RFPs (locate template, review prior RFPs, begin drafting)	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/23/2019	Travis Close	0.7	\$850	\$595	Continue drafting RFPs, set two	Case Organization, Planning and Strategy
4/23/2019	Travis Close	1.2	\$850	\$1,020	Begin drafting ROGS, set 1 (locate template and analyze pioneer requirements, review complaint, review definitions, draft ROGs)	Case Organization, Planning and Strategy
4/24/2019	Guy Wallace	0.6	\$1,350	\$810	com's with GG re mediation; discovery; case schedule	Case Organization, Planning and Strategy
4/24/2019	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ; TCC; ES re preparation of notice of site inspection; second set of RFPs	Discovery (Non-Deposition)
4/24/2019	Guy Wallace	1.1	\$1,350	\$1,485	com's with Barker; Chan; GG; KAS re mediation	Settlement
4/24/2019	Travis Close	0.6	\$850	\$510	Identify all Brookdale facilities mentioned in latest complaint	Case Organization, Planning and Strategy
4/24/2019	Travis Close	0.6	\$850	\$510	Review/analyze which facilities identified in complaint are currently owned by Brookdale	Case Organization, Planning and Strategy
4/24/2019	Travis Close	1.0	\$850	\$850	Continue drafting RFPDs, set 2 (ADA/barrier related)	Case Organization, Planning and Strategy
4/24/2019	Travis Close	0.3	\$850	\$255	Continue drafting RFPDs, set 2 (architectural drawings, accessible policies)	Discovery (Non-Deposition)
4/25/2019	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of facilities selected for first round of inspections; com's with MTJ; ES re same	Discovery (Non-Deposition)
4/25/2019	Travis Close	0.7	\$850	\$595	Meet w/ ELS to analyze/choose remaining facilities to survey in No/So CA	Case Organization, Planning and Strategy
4/25/2019	Travis Close	0.5	\$850	\$425	Meet w/ GBW, MTJ, ELS re: selection of facility inspection list	Case Organization, Planning and Strategy
4/25/2019	Travis Close	0.8	\$850	\$680	Continue drafting pioneer RFPs (definitions) and pioneer ROGS (definitions)	Case Organization, Planning and Strategy
4/25/2019	Travis Close	0.2	\$850	\$170	Meet with MTJ re: status of pioneer requests	Discovery (Non-Deposition)
4/25/2019	Travis Close	1.0	\$850	\$850	Barrier review --- stadium PROW -- # FN 19980-FN 20416 (84-104 of 2706)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/25/2019	Travis Close	1.2	\$850	\$1,020	Continue drafting pioneer RFPs (definitions)	Discovery (Non-Deposition)
4/25/2019	Travis Close	0.7	\$850	\$595	Continue drafting RFPs and ROGs (add in requests for financial data)	Discovery (Non-Deposition)
4/26/2019	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of draft second set of RFP's; revise and edit same	Discovery (Non-Deposition)
4/26/2019	Guy Wallace	0.5	\$1,350	\$675	com's with Mastin GG; MTJ; ES re facilities for first notice of site inspections	Discovery (Non-Deposition)
4/26/2019	Guy Wallace	0.4	\$1,350	\$540	review and analysis of D's responses and objections to P's 1st set of RFP's	Discovery (Non-Deposition)
4/26/2019	Mark Johnson	1.8	\$1,150	\$2,070	review and revise draft 2nd set of document requests	Discovery (Non-Deposition)
4/26/2019	Travis Close	0.1	\$850	\$85	Review MTJ's edits to pioneer/additional RFPs	Case Organization, Planning and Strategy
4/26/2019	Travis Close	0.2	\$850	\$170	Call with GBW re: edits to pioneer discovery	Discovery (Non-Deposition)
4/26/2019	Travis Close	0.2	\$850	\$170	Meet with MTJ re: edits to pioneer discovery RFPs	Discovery (Non-Deposition)
4/28/2019	Mark Johnson	1.7	\$1,150	\$1,955	review and analyze D's responses to 1st set of document requests. take notes re same.	Discovery (Non-Deposition)
4/29/2019	Guy Wallace	1.7	\$1,350	\$2,295	review and analysis of D's responses to P's First RFP; com's with MTJ re same and meet and confer issues re same (.8)	Discovery (Non-Deposition)
4/29/2019	Mark Johnson	3.0	\$1,150	\$3,450	detailed analysis of D's responses to 1st set of document requests; prepare and finalized spreadsheet re same	Discovery (Non-Deposition)
4/29/2019	Mark Johnson	0.2	\$1,150	\$230	email exchanges w/ COC re analysis of D's responses to document request; strategy re same and scheduling call	Discovery (Non-Deposition)
4/29/2019	Mark Johnson	1.0	\$1,150	\$1,150	mtg w/ GBW to review doc responses and spreadsheet, allocate work btwn firms in addressing same, strategy for meeting and conferring	Discovery (Non-Deposition)
4/29/2019	Mark Johnson	0.3	\$1,150	\$345	call w/ J Mastin, GBW re scheduling and scope of access surveys for 10 facilities	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/29/2019	Travis Close	0.3	\$850	\$255	Review Ds responses to Ps first set of RFPs	Case Organization, Planning and Strategy
4/29/2019	Travis Close	0.3	\$850	\$255	Research the self-critical analysis privilege (identified in Ds responses to Ps RFPs 1)	Case Organization, Planning and Strategy
4/29/2019	Travis Close	1.0	\$850	\$850	Doc Rev # FOUNTAINGROVE0001-FOUNTAINGROVE0008758 (1-2 of 100)	Discovery (Non-Deposition)
4/29/2019	Travis Close	1.0	\$850	\$850	Doc Rev # FOUNTAINGROVE0009910-FOUNTAINGROVE0010283 (2-6 of 100)	Discovery (Non-Deposition)
4/30/2019	Guy Wallace	1.3	\$1,350	\$1,755	prepare for and participate in tc with GG; JY; MTJ; TC re D's responses to P's 1st Set of RFPs, and preparation for meet and confer re disputes	Discovery (Non-Deposition)
4/30/2019	Guy Wallace	1.4	\$1,350	\$1,890	revise and edit draft of P's 1st set of interrogatories; com's with MTJ; TCC re same	Discovery (Non-Deposition)
4/30/2019	Guy Wallace	0.5	\$1,350	\$675	revise and edit draft of first notice of site inspections	Discovery (Non-Deposition)
4/30/2019	Guy Wallace	1.3	\$1,350	\$1,755	revise and edit draft of P's Second Set of RFPs	Discovery (Non-Deposition)
4/30/2019	Guy Wallace	0.5	\$1,350	\$675	review and analysis of D's affirmative defenses set forth in Answer	Pleadings and Motions Re: Pleadings
4/30/2019	Guy Wallace	0.9	\$1,350	\$1,215	analysis of potential advantages and disadvantages of pleading a claim under Section 504	Pleadings and Motions Re: Pleadings
4/30/2019	Travis Close	1.3	\$850	\$1,105	Meeting with GBW, GG, JY, MTJ re: strategy for replying to Ds responses to RFPs	Case Organization, Planning and Strategy
4/30/2019	Travis Close	1.0	\$850	\$850	Draft notice of site inspection	Case Organization, Planning and Strategy
4/30/2019	Travis Close	0.5	\$850	\$425	Conitnue drafting notice of site inspection of 20 facilities (finish table)	Case Organization, Planning and Strategy
4/30/2019	Travis Close	0.6	\$850	\$510	Further revisions to Ps second set of RFPDs	Case Organization, Planning and Strategy
4/30/2019	Travis Close	0.5	\$850	\$425	Finish reviewing/amending GBW's edits to draft ROGs for submission	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/30/2019	Travis Close	1.0	\$850	\$850	Doc Rev # FOUNTAINGROVE0010283- FOUNTAINGROVE001286 (6-10 of 100)	Discovery (Non-Deposition)
4/30/2019	Travis Close	0.7	\$850	\$595	Doc Rev # FOUNTAINGROVE001286- FOUNTAINGROVE1618 (10-13 of 100)	Discovery (Non-Deposition)
5/1/2019	Guy Wallace	2.1	\$1,350	\$2,835	revise and edit discovery including Notice of Site Inspections; P's 2nd Set of RFPs; P's First Set of Interrogatories	Discovery (Non-Deposition)
5/1/2019	Mark Johnson	0.1	\$1,150	\$115	finalize and send meet and confer email to OC	Discovery (Non-Deposition)
5/1/2019	Mark Johnson	0.3	\$1,150	\$345	emails and call w/ J Mastin re scheduling inspections in notice of site inspection	Experts (Including Retention)
5/1/2019	Travis Close	0.5	\$850	\$425	Review and analyze complaint and client files to determine which of our plaintiffs spent time in memory care	Case Organization, Planning and Strategy
5/1/2019	Travis Close	1.1	\$850	\$935	Further edits to Draft RFPs set two	Discovery (Non-Deposition)
5/1/2019	Travis Close	1.0	\$850	\$850	Doc Rev # FOUNTAINGROVE001286- FOUNTAINGROVE2294 (10-24 of 100)	Discovery (Non-Deposition)
5/1/2019	Travis Close	1.0	\$850	\$850	Doc Rev # FOUNTAINGROVE2294- FOUNTAINGROVE3490 (24-26 of 100)	Discovery (Non-Deposition)
5/1/2019	Travis Close	1.0	\$850	\$850	Doc Rev # FOUNTAINGROVE3490- FOUNTAINGROVE4112 (26-28 of 100)	Discovery (Non-Deposition)
5/1/2019	Travis Close	1.0	\$850	\$850	Doc Rev # FOUNTAINGROVE4112- FOUNTAINGROVE4853 (28-31 of 100)	Discovery (Non-Deposition)
5/2/2019	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re preparation for meet and confer with D's re disputed issues	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/2/2019	Mark Johnson	0.1	\$1,150	\$115	draft follow-up email to OC re protective order	Discovery (Non-Deposition)
5/2/2019	Mark Johnson	0.3	\$1,150	\$345	review/proof final proposed stipulated protective order for filing; coms w/ staff re filing and service of courtesy copies, attestation.	Discovery (Non-Deposition)
5/2/2019	Mark Johnson	0.2	\$1,150	\$230	coms w/ OC and COC (by email and w/ GBW in person) re scheduling meet and confer re responses to 2nd set of document production	Discovery (Non-Deposition)
5/2/2019	Mark Johnson	1.0	\$1,150	\$1,150	review documents produced by Ds in Relativity	Discovery (Non-Deposition)
5/2/2019	Mark Johnson	0.5	\$1,150	\$575	mtg w/ GBW re priorities for meet and confer session w/ OC	Discovery (Non-Deposition)
5/2/2019	Travis Close	1.0	\$850	\$850	Doc Rev # FOUNTAINGROVE4853-FOUNTAINGROVE5232 (31-32 of 100)	Discovery (Non-Deposition)
5/2/2019	Travis Close	1.0	\$850	\$850	Doc Rev # FOUNTAINGROVE5232-FOUNTAINGROVE6021 (32-35 of 100)	Discovery (Non-Deposition)
5/2/2019	Travis Close	1.0	\$850	\$850	Doc Rev # FOUNTAINGROVE6021-FOUNTAINGROVE6534 (35-36 of 100)	Discovery (Non-Deposition)
5/2/2019	Travis Close	1.0	\$850	\$850	Doc Rev # FOUNTAINGROVE6534-FOUNTAINGROVE7189 (36-39 of 100)	Discovery (Non-Deposition)
5/3/2019	Travis Close	1.0	\$850	\$850	Doc Rev # FOUNTAINGROVE7189-FOUNTAINGROVE7773 (39-41 of 100)	Discovery (Non-Deposition)
5/3/2019	Travis Close	1.0	\$850	\$850	Doc Rev # FOUNTAINGROVE7773-HM0000062 (41-42 of 100)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/3/2019	Travis Close	0.7	\$850	\$595	Doc Rev # FHM0000062-SANRAMON000115 (42-43 of 100)	Discovery (Non-Deposition)
5/6/2019	Travis Close	0.6	\$850	\$510	Continue researching treatment of sample facilities in class action discovery	Case Organization, Planning and Strategy
5/6/2019	Travis Close	1.0	\$850	\$850	Doc Rev # SANRAMON000115-SANRAMON000844 (43-50 of 100)	Discovery (Non-Deposition)
5/6/2019	Travis Close	1.0	\$850	\$850	Doc Rev # SANRAMON000844-SANRAMON001574 (50-54 of 100)	Discovery (Non-Deposition)
5/6/2019	Travis Close	0.9	\$850	\$765	Research treatment of sample facilities in class action discovery	Discovery (Non-Deposition)
5/7/2019	Travis Close	0.8	\$850	\$680	Research secondary sources into discovery of unnamed class members	Case Organization, Planning and Strategy
5/7/2019	Travis Close	1.0	\$850	\$850	Research sampling discovery issues in ADA class actions	Case Organization, Planning and Strategy
5/7/2019	Travis Close	1.0	\$850	\$850	Research facility sampling discovery issues in ADA class actions	Case Organization, Planning and Strategy
5/7/2019	Travis Close	1.4	\$850	\$1,190	Continue researching facility sampling discovery issues in ADA class actions	Case Organization, Planning and Strategy
5/7/2019	Travis Close	1.0	\$850	\$850	Doc Rev # SANRAMON001574-SANRAMON001990 (54-55 of 100)	Discovery (Non-Deposition)
5/7/2019	Travis Close	0.6	\$850	\$510	Prepare for doc review/orientation meeting w/ JP	Discovery (Non-Deposition)
5/7/2019	Travis Close	0.5	\$850	\$425	Meeting/orientation w/ JP re: doc review protocol	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/7/2019	Travis Close	0.2	\$850	\$170	Doc Rev # SANRAMON001990-SANRAMON002153 (55-56 of 100)	Discovery (Non-Deposition)
5/8/2019	Guy Wallace	1.8	\$1,350	\$2,430	prepare for and participate in meet and confer tc with D's re D's objections to P's First Set of RFPs	Discovery (Non-Deposition)
5/8/2019	Mark Johnson	1.5	\$1,150	\$1,725	telephonic meet and confer w/ opposing counsel re responses to first set of document requests	Discovery (Non-Deposition)
5/8/2019	Mark Johnson	1.7	\$1,150	\$1,955	review and take notes on responses to document requests and prepare for telephonic meet and confer re 1st set of document requests.	Discovery (Non-Deposition)
5/8/2019	Mark Johnson	0.3	\$1,150	\$345	follow up conversations w/ GBW re proposed "sample" discovery and issues related to D's position on responses to RPDs	Discovery (Non-Deposition)
5/8/2019	Travis Close	0.3	\$850	\$255	Research caselaw in Ninth Circuit on self critical analyss privilege	Case Organization, Planning and Strategy
5/8/2019	Travis Close	1.1	\$850	\$935	Research facility surveying in ADA class actions (caselaw)	Case Organization, Planning and Strategy
5/8/2019	Travis Close	1.5	\$850	\$1,275	Meeting with opposing counsel re: RFPs #1 responses meet and confer	Case Organization, Planning and Strategy
5/8/2019	Travis Close	0.7	\$850	\$595	Analyze case law on commonality requirements to respond to Ds arguments re: sampling facilities	Case Organization, Planning and Strategy
5/8/2019	Travis Close	0.3	\$850	\$255	Research proportionality rule (FRCP 26t) compliance	Case Organization, Planning and Strategy
5/8/2019	Travis Close	1.3	\$850	\$1,105	Research sampling techniques in ADA class actions -- caselaw	Discovery (Non-Deposition)
5/8/2019	Travis Close	0.3	\$850	\$255	Debrief w. MTJ and GBW following meet and confer call re: Ps RFPs #1	Discovery (Non-Deposition)
5/8/2019	Travis Close	1.2	\$850	\$1,020	Develop further specific responses to RFPs that defendants were confused by (Requests # 12, 15, 16, 17)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/9/2019	Travis Close	0.8	\$850	\$680	Research caselaw applying rule 26(b) post 2015 amendments	Case Organization, Planning and Strategy
5/9/2019	Travis Close	0.9	\$850	\$765	Continue researching rule 26(b)(1) applications in class action context	Case Organization, Planning and Strategy
5/9/2019	Travis Close	1.0	\$850	\$850	Continue researching rule 26(b)(1) applications in class action context	Case Organization, Planning and Strategy
5/9/2019	Travis Close	1.0	\$850	\$850	Doc Rev # SANRAMON002153-SCOTTSVALLEY0000127 (56-60 of 100)	Discovery (Non-Deposition)
5/9/2019	Travis Close	0.9	\$850	\$765	Continue drafting response to clarify RFPs set one, following meet and confer	Discovery (Non-Deposition)
5/9/2019	Travis Close	1.0	\$850	\$850	Doc Rev # SCOTTSVALLEY0000127-SCOTTSVALLEY0000537 (60-63 of 100)	Discovery (Non-Deposition)
5/9/2019	Travis Close	0.9	\$850	\$765	Research rule 26(b)(1) applications in class action context	Discovery (Non-Deposition)
5/9/2019	Travis Close	0.7	\$850	\$595	Continue researching rule 26(b)(1) applications in class action context	Discovery (Non-Deposition)
5/10/2019	Travis Close	0.2	\$850	\$170	Email to SC re: request to clarify term used in rfp, set one	Case Organization, Planning and Strategy
5/10/2019	Travis Close	1.4	\$850	\$1,190	Continue researching clas action cases where courts found discovery requests were propotional per 26(b)	Case Organization, Planning and Strategy
5/10/2019	Travis Close	0.9	\$850	\$765	Continue researching clas action cases where courts found discovery requests were propotional per 26(b)	Case Organization, Planning and Strategy
5/10/2019	Travis Close	0.9	\$850	\$765	Continue researching application of 26(b) requirements and sampling in class actions	Case Organization, Planning and Strategy
5/10/2019	Travis Close	1.0	\$850	\$850	Continue researching application of 26(b) requirements and sampling in class actions	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/10/2019	Travis Close	1.0	\$850	\$850	Doc Rev # SCOTTSVALLEY0000537- SCOTTSVALLEY0000748 (63-69 of 100)	Discovery (Non-Deposition)
5/10/2019	Travis Close	1.4	\$850	\$1,190	Continue drafting responses to clarify Ps RFPs, set one, before next meet and confer with defendants	Discovery (Non-Deposition)
5/13/2019	Travis Close	1.0	\$850	\$850	Continue researching cases analyzing proportionality requirements of Rule 26(b)(1)	Case Organization, Planning and Strategy
5/13/2019	Travis Close	0.7	\$850	\$595	Continue researching cases analyzing proportionality requirements of Rule 26(b)(1)	Case Organization, Planning and Strategy
5/13/2019	Travis Close	1.0	\$850	\$850	Doc Rev # SCOTTSVALLEY0000748- SCOTTSVALLEY0000810 (69-80 of 100)	Discovery (Non-Deposition)
5/13/2019	Travis Close	1.1	\$850	\$935	Continue researching cases analyzing proportionality requirements of Rule 26(b)(1)	Discovery (Non-Deposition)
5/13/2019	Travis Close	1.0	\$850	\$850	Continue researching cases analyzing proportionality requirements of Rule 26(b)(1)	Discovery (Non-Deposition)
5/14/2019	Mark Johnson	0.1	\$1,150	\$115	follow-up email w/ OC re scheduling meet and confer session number 2	Discovery (Non-Deposition)
5/14/2019	Mark Johnson	0.1	\$1,150	\$115	talk w/ TCC re strategy for follow-up letter narrowing requests in RPD #1	Discovery (Non-Deposition)
5/14/2019	Travis Close	0.2	\$850	\$170	Meet w/ MTJ re: coordination of discovery dispute letter	Case Organization, Planning and Strategy
5/14/2019	Travis Close	0.2	\$850	\$170	Meet w/ AML re: format of next production of Def's docs	Case Organization, Planning and Strategy
5/14/2019	Travis Close	0.7	\$850	\$595	Begin drafting memo re: review of class action 26(b) discovery disputes	Case Organization, Planning and Strategy
5/14/2019	Travis Close	0.5	\$850	\$425	Continue drafting memo re: review of class action 26(b) discovery disputes	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/14/2019	Travis Close	1.0	\$850	\$850	Doc Rev # SCOTTSVALLEY0000810-BKD0000559 (80-91 of 100)	Discovery (Non-Deposition)
5/14/2019	Travis Close	1.0	\$850	\$850	Create case chart of rule 26(b) class action rulings	Discovery (Non-Deposition)
5/14/2019	Travis Close	1.0	\$850	\$850	Create case chart of rule 26(b) class action rulings	Discovery (Non-Deposition)
5/14/2019	Travis Close	0.9	\$850	\$765	Continue creating chart of recent rule 26(b) class action case applications	Discovery (Non-Deposition)
5/15/2019	Guy Wallace	4.6	\$1,350	\$6,210	legal research and analysis re D's proposal for limiting discovery to a sample of "Certain Communities"; com's with MTJ re same (.5)	Discovery (Non-Deposition)
5/15/2019	Mark Johnson	3.3	\$1,150	\$3,795	review TAC and prepare analysis and spreadshee of facilities in which plaintiffs resided and facilities otherwise referenced in complaint; draft email to COC summarizing same (.3)	Case Organization, Planning and Strategy
5/15/2019	Mark Johnson	0.8	\$1,150	\$920	calls w/ GBW (x2) re D's proposal to limit discovery to sample of facilities and strategy for responding to same; response to D's email re last meet and confer and strategy for a motion to compel.	Discovery (Non-Deposition)
5/15/2019	Mark Johnson	0.4	\$1,150	\$460	call w/ SCC and TCC re specific RPDs in first set of document production for meet and confer session w/ OC	Discovery (Non-Deposition)
5/15/2019	Mark Johnson	0.3	\$1,150	\$345	mtg w/ TCC re further meet and confer plans for 1st set of RPDs, including review of draft correspondence re same and proposed narrowing of certain requests.	Discovery (Non-Deposition)
5/15/2019	Mark Johnson	0.2	\$1,150	\$230	review and analyze OC email summarizing last meet and cofer session; respond re proposed meeting	Discovery (Non-Deposition)
5/15/2019	Mark Johnson	0.2	\$1,150	\$230	mtg w/ AML re status of document review and anticipated future productions.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/15/2019	Travis Close	0.9	\$850	\$765	Continue drafting memo re: applications of rule 26(b) following 2015 amendments in class action context	Case Organization, Planning and Strategy
5/15/2019	Travis Close	0.4	\$850	\$340	Prepare for meeting to discuss meet and confer / discovery requests with MTJ, SSC	Case Organization, Planning and Strategy
5/15/2019	Travis Close	0.6	\$850	\$510	Call with MTJ, SSC re doc discovery meet and confer dispute	Case Organization, Planning and Strategy
5/15/2019	Travis Close	1.2	\$850	\$1,020	Continue drafting rule 26(b) class action application memo	Case Organization, Planning and Strategy
5/15/2019	Travis Close	0.9	\$850	\$765	Continue drafting memo re rule 26(b) applications in class discovery disputes	Case Organization, Planning and Strategy
5/15/2019	Travis Close	0.8	\$850	\$680	Continue drafting memo re rule 26(b) applications in class discovery disputes	Case Organization, Planning and Strategy
5/15/2019	Travis Close	1.0	\$850	\$850	Doc Rev # SCOTTSVALLEY0000810-BKD0000559 (91-100 of 100)	Discovery (Non-Deposition)
5/16/2019	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ; TCC re scope of discovery and preparation for meet and confer with D's re same; analysis of case law re same	Discovery (Non-Deposition)
5/16/2019	Travis Close	0.1	\$850	\$85	Review chart of Brookdale facilities prepared by ELS	Case Organization, Planning and Strategy
5/16/2019	Travis Close	0.9	\$850	\$765	Continue drafting 26(b) class action proportionality memo (intro, standard of review)	Case Organization, Planning and Strategy
5/16/2019	Travis Close	0.9	\$850	\$765	Continue drafting 26(b) class action proportionality memo (analysis)	Case Organization, Planning and Strategy
5/16/2019	Travis Close	1.1	\$850	\$935	Continue drafting 26(b) class action proportionality memo (citations)	Case Organization, Planning and Strategy
5/16/2019	Travis Close	1.0	\$850	\$850	Continue drafting 26(b) class action proportionality memo (analysis, citations)	Discovery (Non-Deposition)
5/17/2019	Guy Wallace	0.9	\$1,350	\$1,215	revise and edit email to D's re 5/20 meet and confer; com's with MTJ re same	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/17/2019	Travis Close	0.5	\$850	\$425	Further edits to meet and confer response re: scope of discovery	Case Organization, Planning and Strategy
5/17/2019	Travis Close	0.9	\$850	\$765	Revise/line edits to rule 26 memo (standard of review)	Case Organization, Planning and Strategy
5/17/2019	Travis Close	0.7	\$850	\$595	Revise/line edits to rule 26 memo (analysis)	Case Organization, Planning and Strategy
5/17/2019	Travis Close	1.1	\$850	\$935	Continue revising memo on rule 26(b) proportionality in class action litigation (analysis)	Case Organization, Planning and Strategy
5/17/2019	Travis Close	0.6	\$850	\$510	Continue revising memo on rule 26(b) proportionality in class action litigation (citations)	Case Organization, Planning and Strategy
5/18/2019	Guy Wallace	1.4	\$1,350	\$1,890	legal research and analysis re D's claims re burden and disproportionality	Discovery (Non-Deposition)
5/20/2019	Mark Johnson	1.5	\$1,150	\$1,725	meet and confer w/ OC re responses to RPD 1, other issues re document production	Discovery (Non-Deposition)
5/20/2019	Mark Johnson	0.4	\$1,150	\$460	follow-up conversation w/ GBW and TCC re meet and confer session and implications, planning based on same	Discovery (Non-Deposition)
5/20/2019	Mark Johnson	0.8	\$1,150	\$920	review prior email exchange and notes from last meet and confer session, chart of responses to prepare for 2nd meet and confer session; prepare agenda for same	Discovery (Non-Deposition)
5/20/2019	Mark Johnson	0.7	\$1,150	\$805	review materials from SCC, including Brookdale employee job descriptions, excerpts from Brookdale 10k and annual / quarterly reports as background and support for document requests and as prep for meet and confer session # 2 re RPD set 1.	Discovery (Non-Deposition)
5/20/2019	Mark Johnson	1.7	\$1,150	\$1,955	review notes from meet and confer session and TCC notes of same; draft email to OC confirming parties' positions and explanations; circulate to COC, review and incorporate edits	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/20/2019	Mark Johnson	0.2	\$1,150	\$230	mtg w/ TCC re prep for meet and confer session #2 re RPD 1	Discovery (Non-Deposition)
5/20/2019	Travis Close	0.6	\$850	\$510	Meet w/ MTJ, GBW post meet-and-confer telephone call	Case Organization, Planning and Strategy
5/20/2019	Travis Close	1.0	\$850	\$850	Draft email summarizing meet and confer meeting on 5/20	Case Organization, Planning and Strategy
5/20/2019	Travis Close	1.5	\$850	\$1,275	Meet and confer telephone meeting re: RFPs, scope of discovery/sampling	Discovery (Non-Deposition)
5/21/2019	Mark Johnson	1.2	\$1,150	\$1,380	review cases re Rule 34 site inspections generally and ADA site inspections.	Discovery (Non-Deposition)
5/22/2019	Guy Wallace	0.2	\$1,350	\$270	com's with MTJ; AML re D's production of documents	Discovery (Non-Deposition)
5/22/2019	Mark Johnson	0.2	\$1,150	\$230	emails and mtg w/ AML re recent document production and plans for reviewing same	Discovery (Non-Deposition)
5/22/2019	Mark Johnson	0.1	\$1,150	\$115	email exchange w/ J Mastin re proposed dates for inspection and status of negotiations w/ OC re same	Discovery (Non-Deposition)
5/23/2019	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ; AMA re D's recent production of blueprints and manuals	Discovery (Non-Deposition)
5/23/2019	Mark Johnson	0.4	\$1,150	\$460	mtg w/ GBW and TCC and email w/ AML re strategy for review of new document production and prioritizing / managing review of same	Discovery (Non-Deposition)
5/23/2019	Mark Johnson	0.3	\$1,150	\$345	review of index of new document production and mtg w/ AML re same.	Discovery (Non-Deposition)
5/23/2019	Mark Johnson	0.1	\$1,150	\$115	email to OC re scheduling meet and confer session and info re position on site inspection.	Discovery (Non-Deposition)
5/24/2019	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ; TCC; AMA re D's production and meet and confer efforts re same	Discovery (Non-Deposition)
5/24/2019	Travis Close	1.0	\$850	\$850	Doc Review -- targeted policy search -- # BKD0005104- BKD0005134 (1-5 of 26) & BKD0018452- BKD0018461	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/24/2019	Travis Close	1.0	\$850	\$850	Doc Review -- targeted policy search -- # BKD0005134- BKD0005201 (5-9 of 26)	Discovery (Non-Deposition)
5/28/2019	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of D's motion for stay pending appeal of arbitration ruling; preparation for tc with JY re oral argument preparation	Other Motions
5/28/2019	Mark Johnson	0.2	\$1,150	\$230	review ltr from Ds with proposal and argument in support of sampling approach to discovery and proposed facilities for sampling purposes and inspection.	Discovery (Non-Deposition)
5/28/2019	Travis Close	1.0	\$850	\$850	Doc Review -- targeted policy search -- # BKD0005201- BKD0018351 (9-17 of 26)	Discovery (Non-Deposition)
5/28/2019	Travis Close	1.0	\$850	\$850	Doc Review -- targeted policy search -- # BKD0018351- BKD0018869 (17-19 of 26)	Discovery (Non-Deposition)
5/28/2019	Travis Close	0.5	\$850	\$425	Doc Review -- targeted policy search -- # BKD0018869 - BKD0022758 (19-26 of 26)	Discovery (Non-Deposition)
5/29/2019	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ re meet and confer with D's re site inspections and issue of sampled discovery	Discovery (Non-Deposition)
5/29/2019	Mark Johnson	0.7	\$1,150	\$805	review and compare proposed list of site inspection locations from Ds to noticed sites; draft email to experts re identity of and planning for inspections.	Discovery (Non-Deposition)
5/29/2019	Mark Johnson	0.3	\$1,150	\$345	draft response to OC ltr re sample approach to discovery and site inspections	Discovery (Non-Deposition)
5/29/2019	Mark Johnson	0.1	\$1,150	\$115	call w/ J Mastin re site inspection schedule and D's position	Experts (Including Retention)
5/29/2019	Travis Close	0.9	\$850	\$765	Draft email analyzing discovery requests in Runton case and potential strategies for our case	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/29/2019	Travis Close	0.3	\$850	\$255	Review prior RFPs for possible requests covering time and motion studies and source code	Case Organization, Planning and Strategy
5/29/2019	Travis Close	0.7	\$850	\$595	Begin drafting memo re: service alignment discovery in Runton prior case	Case Organization, Planning and Strategy
5/29/2019	Travis Close	0.7	\$850	\$595	Continue drafting memo/ re: service alignment discovery in prior case	Case Organization, Planning and Strategy
5/29/2019	Travis Close	1.1	\$850	\$935	Doc review -- service alignment -- # BKD0005173-BKD0018359 (1-7 of 26)	Discovery (Non-Deposition)
5/29/2019	Travis Close	0.5	\$850	\$425	Research prior case v. BSL re: service alignment discovery issue	Discovery (Non-Deposition)
5/29/2019	Travis Close	0.8	\$850	\$680	Continue drafting memo re: service alignment	Discovery (Non-Deposition)
5/30/2019	Guy Wallace	0.9	\$1,350	\$1,215	com's with MTJ; TCC; AMA re D's production of documents to date and review and analysis of same	Discovery (Non-Deposition)
5/30/2019	Travis Close	1.0	\$850	\$850	Review/analyze operations manuals produced with GBW	Case Organization, Planning and Strategy
5/30/2019	Travis Close	1.0	\$850	\$850	Doc review -- service alignment -- # BKD0018359-BKD0018437 (7-16 of 26)	Discovery (Non-Deposition)
5/30/2019	Travis Close	0.7	\$850	\$595	Doc review -- service alignment -- # BKD0018437-BKD0018462 (16-26 of 26)	Discovery (Non-Deposition)
5/30/2019	Travis Close	0.5	\$850	\$425	Doc review -- service alignment plan -- # CTRL0000002- CTRL0000082.0001 (1-17 of 105)	Discovery (Non-Deposition)
5/30/2019	Travis Close	1.0	\$850	\$850	Finish analysis of service alignment system / discovery and email to MJT, GBW	Discovery (Non-Deposition)
5/30/2019	Travis Close	0.7	\$850	\$595	Doc review -- service alignment plan -- # CTRL0000082.0001-CTRL0000416 (17-46 of 105)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/31/2019	Mark Johnson	0.5	\$1,150	\$575	mtg w/ AML re blueprints produced in discovery and uploading and conveying same to experts for inspections.	Discovery (Non-Deposition)
6/3/2019	Mark Johnson	0.2	\$1,150	\$230	coms w/ J. Mastin re site inspections	Experts (Including Retention)
6/3/2019	Mark Johnson	1.7	\$1,150	\$1,955	review and analysis of additional docs from PRA and web site, including resolutions approving paving contracts	Pleadings and Motions Re: Pleadings
6/4/2019	Guy Wallace	0.6	\$1,350	\$810	com's with Waters; MTJ; TCC re site inspections	Discovery (Non-Deposition)
6/4/2019	Travis Close	0.9	\$850	\$765	Research sampling procedures in recent NYC access case	Case Organization, Planning and Strategy
6/4/2019	Travis Close	0.6	\$850	\$510	Meet w/ MTJ, GBW re: travel to Brookdale facilities for inspections	Case Organization, Planning and Strategy
6/4/2019	Travis Close	0.6	\$850	\$510	Doc Review -- Resident council minutes -- # BKD0004769-BKD0004838 (1-8 of 109)	Discovery (Non-Deposition)
6/4/2019	Travis Close	1.0	\$850	\$850	Doc Review -- Resident council minutes -- # BKD0004838-BKD0004893 (8-19 of 109)	Discovery (Non-Deposition)
6/4/2019	Travis Close	1.0	\$850	\$850	Doc Review -- Resident council minutes -- # BKD0004893-BKD0004956 (19-24 of 109)	Discovery (Non-Deposition)
6/4/2019	Travis Close	0.9	\$850	\$765	Doc Review -- Resident council minutes -- # BKD0004956-BKD0005104 (24-27 of 109)	Discovery (Non-Deposition)
6/5/2019	Guy Wallace	0.6	\$1,350	\$810	com's with Waters; GG; MTJ re site inspections and protocol re same	Discovery (Non-Deposition)
6/5/2019	Guy Wallace	0.6	\$1,350	\$810	review and analysis of J. Gilliam's Order denying motion for interlocutory appeal	Other Motions
6/5/2019	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ re D's incomplete production of documents re First Set of RFPs and preparation for 6/6 meet and confer re same and MTC	Other Motions
6/5/2019	Mark Johnson	0.2	\$1,150	\$230	coms w/ OC e meet and confer sessions, site inspections.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/5/2019	Mark Johnson	1.0	\$1,150	\$1,150	prep for 3rd meet and confer w/ OC re third set of document requests, including mtg w/ GBW re same (.5)	Discovery (Non-Deposition)
6/5/2019	Mark Johnson	0.6	\$1,150	\$690	review and analysis of decision denying stay pending appeal and interlocutory appeal	Other Motions
6/5/2019	Travis Close	0.3	\$850	\$255	Review judge gilliam's order denying Ds mtn to stay	Case Organization, Planning and Strategy
6/5/2019	Travis Close	1.0	\$850	\$850	Doc Review -- Resident council minutes -- # BKD0005104-BKD0007370 (27-55 of 109)	Discovery (Non-Deposition)
6/6/2019	Mark Johnson	1.0	\$1,150	\$1,150	meet and confer call w/ OC re 1st set of document requests, site inspections, rolling production, proposed motion to compel	Discovery (Non-Deposition)
6/6/2019	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW following meet and confer session re recap and strategy for mtn to compel	Discovery (Non-Deposition)
6/6/2019	Mark Johnson	0.4	\$1,150	\$460	mtg w/ AML re status of document production and coding, review index of production for meet and confer w/ OC	Discovery (Non-Deposition)
6/6/2019	Mark Johnson	0.2	\$1,150	\$230	mtg w/ TCC before meet and confer call to review notes of past calls, discuss strategy for call and status of production	Discovery (Non-Deposition)
6/6/2019	Mark Johnson	0.5	\$1,150	\$575	prep for meet and confer session - review chart of requests and responses to 1st set of RPDs, notes. prepare outline / agenda for call, including inspection issues.	Discovery (Non-Deposition)
6/6/2019	Mark Johnson	0.3	\$1,150	\$345	call and email with COC GG re site inspection planning and protocol	Discovery (Non-Deposition)
6/6/2019	Mark Johnson	0.2	\$1,150	\$230	coms w/ Mastin and AML re issues w/ Blueprints dropboxl link	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/6/2019	Mark Johnson	0.5	\$1,150	\$575	review sample of facility blueprints produced by Defendants	Discovery (Non-Deposition)
6/6/2019	Mark Johnson	0.2	\$1,150	\$230	call w/ G Waters re site inspection planning, scheduling and blueprints	Discovery (Non-Deposition)
6/6/2019	Travis Close	1.0	\$850	\$850	Meet & confer call w/ MTJ, GG, Mallory, Jeff K re: discovery/inspections	Case Organization, Planning and Strategy
6/6/2019	Travis Close	0.2	\$850	\$170	Meet w/ MTJ re: traveling to inspections next week	Case Organization, Planning and Strategy
6/6/2019	Travis Close	0.6	\$850	\$510	Book flight and hotel to San Diego for 3 days of inspections	Discovery (Non-Deposition)
6/7/2019	Guy Wallace	1.3	\$1,350	\$1,755	com's with Waters; Mastin; GG; JY; MTJ; TCC re site inspections	Discovery (Non-Deposition)
6/7/2019	Travis Close	1.2	\$850	\$1,020	Call w/ MTJ, GBW, and experts re: planning for inspections next week	Case Organization, Planning and Strategy
6/7/2019	Travis Close	0.4	\$850	\$340	Meet w/ MTJ, GBW following call w/ experts re: inspections next week	Case Organization, Planning and Strategy
6/7/2019	Travis Close	0.2	\$850	\$170	Review latest minutes from Brookdale/LCS family council meeting	Discovery (Non-Deposition)
6/11/2019	Guy Wallace	1.3	\$1,350	\$1,755	analysis of meet and confer email from Kopczynski re sampling & com's with MTJ re response thereto (.4)	Discovery (Non-Deposition)
6/11/2019	Guy Wallace	0.4	\$1,350	\$540	com's with GG; MTJ; TCC re site inspections of D's facilities	Discovery (Non-Deposition)
6/11/2019	Guy Wallace	1.8	\$1,350	\$2,430	legal research and analysis re D's proposal for a global sample of discovery	Discovery (Non-Deposition)
6/11/2019	Mark Johnson	0.2	\$1,150	\$230	revise draft corres to OC re document producteion issues and response to their email and send to COC GG for review	Discovery (Non-Deposition)
6/11/2019	Mark Johnson	0.1	\$1,150	\$115	email TCC with further suggestions re issues to be raised with OC at site inspection.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/11/2019	Travis Close	0.2	\$850	\$170	Review response to discovery dispute from opposing counsel	Case Organization, Planning and Strategy
6/11/2019	Travis Close	0.3	\$850	\$255	Review Ds responses to Ps second set of RFPs and first set of ROGs	Case Organization, Planning and Strategy
6/11/2019	Travis Close	0.6	\$850	\$510	Phone call w GG re: how today's inspection went & type up notes	Case Organization, Planning and Strategy
6/11/2019	Travis Close	0.6	\$850	\$510	Pickup car rental from airport and drive to hotel in San Diego	Case Organization, Planning and Strategy
6/11/2019	Travis Close	1.0	\$850	\$850	Doc Review -- Resident council minutes -- #-BKD0007460- BKD0007649 (56-58 of 109)	Discovery (Non-Deposition)
6/11/2019	Travis Close	0.4	\$850	\$340	Doc Review -- Resident council minutes -- #BKD0007649- BKD0007700 (58 of 109)	Discovery (Non-Deposition)
6/11/2019	Travis Close	1.2	\$850	\$1,020	Travel to SFO from work to attend inspections tomorrow	Discovery (Non-Deposition)
6/11/2019	Travis Close	1.0	\$850	\$850	Doc Review -- Resident council minutes -- #BKD0007700-BKD0007822 (58-61 of 109)	Discovery (Non-Deposition)
6/11/2019	Travis Close	3.6	\$850	\$3,060	Flight from SFO to SAN for facility inspections -- 1 hr 40 min, delayed 2 hours	Discovery (Non-Deposition)
6/12/2019	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re mtn to compel doc requests 1 and 10, sampling research and site inspection dispute	Discovery (Non-Deposition)
6/12/2019	Mark Johnson	0.3	\$1,150	\$345	email exchanges w/ GG and TCC re site inspection dispute and memory care units.	Discovery (Non-Deposition)
6/12/2019	Mark Johnson	0.2	\$1,150	\$230	com w/ GBW re inspections and D's denial of access to occupiend rooms not being available for inspection	Discovery (Non-Deposition)
6/12/2019	Mark Johnson	0.1	\$1,150	\$115	review and analyze TCC memo documenting site inspection.	Discovery (Non-Deposition)
6/12/2019	Travis Close	1.3	\$850	\$1,105	Drive to Brookdale Oceanside from San Diego hotel to assist JM in conducting inspections of facility	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/12/2019	Travis Close	0.5	\$850	\$425	Prepare for inspections at Brookdale Oceanside	Discovery (Non-Deposition)
6/12/2019	Travis Close	6.5	\$850	\$5,525	Inspections at Brookdale Oceanside with JM & opposing counsel	Discovery (Non-Deposition)
6/12/2019	Travis Close	0.9	\$850	\$765	Drive back from facility inspections to hotel	Discovery (Non-Deposition)
6/12/2019	Travis Close	1.4	\$850	\$1,190	Draft memo reporting back to colleagues and co-counsel of today's inspection	Discovery (Non-Deposition)
6/13/2019	Travis Close	1.0	\$850	\$850	Drive to Brookdale San Marcos from San Diego hotel to assist JM in conducting inspections of facility	Discovery (Non-Deposition)
6/13/2019	Travis Close	0.4	\$850	\$340	Prepare for inspection at Brookdale San Marcos	Discovery (Non-Deposition)
6/13/2019	Travis Close	6.9	\$850	\$5,865	Inspection of Brookdale San Marcos from 10am-6pm (1 hr break	Discovery (Non-Deposition)
6/13/2019	Travis Close	0.9	\$850	\$765	Drive back to hotel from Brookdale San Marcos after inspections	Discovery (Non-Deposition)
6/13/2019	Travis Close	1.3	\$850	\$1,105	Draft memo re: report of today's inspection of San Marcos facility for colleagues and co-counsel	Discovery (Non-Deposition)
6/14/2019	Travis Close	0.6	\$850	\$510	Drive to Brookdale Clairemont from San Diego hotel for inspection	Discovery (Non-Deposition)
6/14/2019	Travis Close	7.0	\$850	\$5,950	Inspection at Brookdale Clairemont from 9am-5pm with GW and MP (1 hr lunch)	Discovery (Non-Deposition)
6/14/2019	Travis Close	1.5	\$850	\$1,275	Draft memo reporting on today's inspection for colleagues and co-counsel	Discovery (Non-Deposition)
6/14/2019	Travis Close	1.7	\$850	\$1,445	Flight from San Diego to Oakland returning home from inspections	Discovery (Non-Deposition)
6/14/2019	Travis Close	0.5	\$850	\$425	Travel to airport and car rental return from Brookdale Clairemont	Discovery (Non-Deposition)
6/17/2019	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ re meet and confer with D's re site inspections; D's proposed sampled discovery; D's deficient responses to P's 2nd set of RFPs	Discovery (Non-Deposition)
6/17/2019	Mark Johnson	3.0	\$1,150	\$3,450	travel to SFV for site inspection	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/17/2019	Travis Close	0.3	\$850	\$255	Review GG's account of first day inspection at Brookhurst	Case Organization, Planning and Strategy
6/17/2019	Travis Close	1.0	\$850	\$850	Doc Review -- Resident council minutes -- # BKD0007822-BKD0018255 (62-66 of 109)	Discovery (Non-Deposition)
6/18/2019	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ re results of site inspection; further meet and confer with Defendants	Discovery (Non-Deposition)
6/18/2019	Mark Johnson	7.5	\$1,150	\$8,625	site inspection - Chatsworth community	Discovery (Non-Deposition)
6/18/2019	Travis Close	0.8	\$850	\$680	Research orders by judge laurel beeler ordering disclosure of class member contact information	Case Organization, Planning and Strategy
6/18/2019	Travis Close	0.3	\$850	\$255	Review correspondence re: Defendants taking chanate and vacaville inspections off calendar	Case Organization, Planning and Strategy
6/19/2019	Guy Wallace	0.6	\$1,350	\$810	legal research and analysis re D's proposal for sampled discovery	Discovery (Non-Deposition)
6/19/2019	Mark Johnson	6.5	\$1,150	\$7,475	site inspection w/ expert Mastin and OC Moshe Peters	Discovery (Non-Deposition)
6/19/2019	Mark Johnson	2.8	\$1,150	\$3,220	return travel from SFV for site inspections	Discovery (Non-Deposition)
6/19/2019	Travis Close	0.1	\$850	\$85	Retrieve floor plans of north tarzana facility for MTJ	Case Organization, Planning and Strategy
6/20/2019	Travis Close	0.4	\$850	\$340	Recount/discuss last week's inspections with AML	Case Organization, Planning and Strategy
6/20/2019	Travis Close	0.2	\$850	\$170	Meet w/ MTJ re: account of inspections on Tues	Case Organization, Planning and Strategy
6/20/2019	Travis Close	0.3	\$850	\$255	Review site inspection report by JY from yesterday's facility	Discovery (Non-Deposition)
6/24/2019	Guy Wallace	1.5	\$1,350	\$2,025	outline of points re motion to compel unique form contracts and ADA policy documents	Discovery (Non-Deposition)
6/24/2019	Guy Wallace	0.5	\$1,350	\$675	preparation for meet and confer with Barker; Jensen; et al.; GG; MTJ re P's RFPs 1 & 10; D's proposal for general sampled discovery	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/24/2019	Guy Wallace	0.4	\$1,350	\$540	com's with GG; MTJ; TCC re results of meet and confer	Discovery (Non-Deposition)
6/24/2019	Guy Wallace	0.9	\$1,350	\$1,215	analysis of D's argument that all policy documents and contract documents can be produced through a sampled production despite D's contention that all ALFs and Resident Agreements are different	Discovery (Non-Deposition)
6/24/2019	Guy Wallace	1.9	\$1,350	\$2,565	legal research and analysis re D's proposal for sampled discovery; burden to show that specific RFPs are unduly burdensome, not that P's overall discovery is burdensome	Other Motions
6/24/2019	Guy Wallace	1.1	\$1,350	\$1,485	tc with Barker; Jensen; BB; GG; MTJ re P's RFPs Nos. 1 & 10 and D's proposal for global sampling approach to discovery; site inspections and method re same	Other Motions
6/24/2019	Travis Close	0.1	\$850	\$85	Meet w/ AML re: update on Ds doc production	Case Organization, Planning and Strategy
6/24/2019	Travis Close	1.0	\$850	\$850	Meet & confer phone call with MTJ, GBW, co-counsel and Defendants	Case Organization, Planning and Strategy
6/24/2019	Travis Close	0.5	\$850	\$425	Debrief call with GG, GBW, MTJ (inspections, motion to compel, etc)	Case Organization, Planning and Strategy
6/25/2019	Guy Wallace	2.1	\$1,350	\$2,835	preparation and drafting of MTC re production of Resident Agreements; ADA policies	Other Motions
6/25/2019	Travis Close	0.3	\$850	\$255	Research travel to San Pablo facility & floor plans for inspection on 6/27	Discovery (Non-Deposition)
6/26/2019	Guy Wallace	3.3	\$1,350	\$4,455	legal research and analysis re case law re D's claims of burdensomeness, disproportionality, and the potential applicability of sampling to address same; review and analysis of TCC memo re same	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/26/2019	Guy Wallace	3.2	\$1,350	\$4,320	preparation and drafting of outline of arguments and points for motion to compel production of ADA policies and Resident Agreements	Other Motions
6/26/2019	Travis Close	0.3	\$850	\$255	Email to team re: dates for proceeding with San Ramon inspection in light of our plaintiff Stacia Stiner	Case Organization, Planning and Strategy
6/27/2019	Guy Wallace	0.5	\$1,350	\$675	revise and edit draft stipulation and letter to D's re inspection of Assisted living facilities; com's with GG re same	Discovery (Non-Deposition)
6/27/2019	Guy Wallace	7.4	\$1,350	\$9,990	preparation and drafting of MTC re policy documents and resident form agreements	Other Motions
6/28/2019	Guy Wallace	0.9	\$1,350	\$1,215	preparation and drafting of MTC re ADA policy documents and resident agreements	Other Motions
6/28/2019	Guy Wallace	1.8	\$1,350	\$2,430	revise and edit draft MTC to include proposed changes from GG; SC; MTJ; TCC	Other Motions
6/28/2019	Guy Wallace	0.4	\$1,350	\$540	com's with Barker re schedule on MTC	Other Motions
6/28/2019	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re draft MTC re policies and resident agreements & D's arguments and schedule re briefing	Other Motions
6/28/2019	Guy Wallace	0.3	\$1,350	\$405	com's with SC; TCC re further revisions to draft MTC re policies and resident contracts	Other Motions
6/28/2019	Travis Close	0.4	\$850	\$340	Edits/revisions to GBW's motion to compel RFPs 1 and 10	Case Organization, Planning and Strategy
6/28/2019	Travis Close	0.8	\$850	\$680	Review cases where Judge Beeler has issued order re class pioneer notice	Case Organization, Planning and Strategy
6/28/2019	Travis Close	0.3	\$850	\$255	Review California DSS application instructions for facility license (re: Motion to compel)	Case Organization, Planning and Strategy
6/28/2019	Travis Close	0.2	\$850	\$170	Email to team re: inspection report and planning for upcoming inspections	Case Organization, Planning and Strategy
6/28/2019	Travis Close	1.2	\$850	\$1,020	Begin drafting stipulation of notice to proposed class members	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/28/2019	Travis Close	0.6	\$850	\$510	Meet w/ GBW re: motion to compel	Case Organization, Planning and Strategy
6/28/2019	Travis Close	0.5	\$850	\$425	Continue drafting stip class notice	Case Organization, Planning and Strategy
6/30/2019	Guy Wallace	0.3	\$1,350	\$405	analysis of D's proposal for phased discovery and negative impact on P's	Discovery (Non-Deposition)
7/1/2019	Guy Wallace	2.1	\$1,350	\$2,835	preparation and drafting of proposed stipulation and order re schedule on MTC; com's with Barker; Jensen; GG re same (.6)	Other Motions
7/1/2019	Guy Wallace	0.6	\$1,350	\$810	review and analysis of TCC proposed edits to joint letter brief; new cases cited therein re sampling	Other Motions
7/1/2019	Travis Close	1.2	\$850	\$1,020	Continue researching cases where parties agreed to sampling	Case Organization, Planning and Strategy
7/1/2019	Travis Close	1.0	\$850	\$850	Continue researching cases where parties agreed to sampling	Case Organization, Planning and Strategy
7/1/2019	Travis Close	1.0	\$850	\$850	Revisions to GBW's joint letter to Judge Beeler re: RFPs 1 and 10	Case Organization, Planning and Strategy
7/1/2019	Travis Close	0.3	\$850	\$255	Call w/ GBW re: joint letter sampling dispute	Case Organization, Planning and Strategy
7/1/2019	Travis Close	1.3	\$850	\$1,105	Research cases where parties agreed to sampling	Discovery (Non-Deposition)
7/3/2019	Travis Close	0.2	\$850	\$170	Call w/ MTJ re: Ds cancellations of inspections	Case Organization, Planning and Strategy
7/3/2019	Travis Close	0.1	\$850	\$85	Email to experts re: inspections/cancellations	Case Organization, Planning and Strategy
7/7/2019	Guy Wallace	3.4	\$1,350	\$4,590	preparation and drafting of Plaintiffs' further CMC statement	Case Management Conferences
7/8/2019	Guy Wallace	3.8	\$1,350	\$5,130	preparation and drafting of P's portions of joint CMC statement; review and analysis of D's portions; com's with GG re same (.4)	Case Management Conferences

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/8/2019	Guy Wallace	0.4	\$1,350	\$540	com's with Jensen; Waters; Mastin; GG; MTJ; TCC re site inspections and scheduling of same	Discovery (Non-Deposition)
7/8/2019	Guy Wallace	0.4	\$1,350	\$540	review and analysis of letter from Barker; D's proposed stiipulation re inspections & vagueness re "representative" nature of inspections	Discovery (Non-Deposition)
7/8/2019	Guy Wallace	0.5	\$1,350	\$675	legal research and analysis re Blair v. RAC and application to language in Defendants' arbitration agreements	Misc. Research
7/8/2019	Guy Wallace	0.3	\$1,350	\$405	com's with AA re D's production of documents to date, and production of form contracts	Other Motions
7/8/2019	Guy Wallace	0.5	\$1,350	\$675	com's with D's counsel re P's joint letter brief	Other Motions
7/8/2019	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of D's portion of joint letter brief re production of form contracts and ADA policies; com's with GG re same (.3)	Other Motions
7/8/2019	Travis Close	0.9	\$850	\$765	Change citations from SAC to TAC in CMC statement draft by GBW	Case Organization, Planning and Strategy
7/8/2019	Travis Close	0.2	\$850	\$170	Review Ds position re joint discovery dispute	Case Organization, Planning and Strategy
7/8/2019	Travis Close	1.4	\$850	\$1,190	Create key for converting citations from SAC to TAC	Pleadings and Motions Re: Pleadings
7/9/2019	Guy Wallace	0.5	\$1,350	\$675	review and analysis of D's revised draft of CMC statement; com's with Jensen; GG re same	Case Management Conferences
7/9/2019	Guy Wallace	0.7	\$1,350	\$945	revise and edit draft stipulation prepared by GG re site inspections; com's with GG re same	Discovery (Non-Deposition)
7/9/2019	Guy Wallace	0.2	\$1,350	\$270	com's with AA re D's production of documents re resident admission agreements, and its total overall production	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/9/2019	Guy Wallace	6.4	\$1,350	\$8,640	review and analysis of D's portion of MTC and authorities therein; preparation and drafting of P's responsive points and authorities re same & edit to 2.5 pages	Other Motions
7/9/2019	Guy Wallace	1.1	\$1,350	\$1,485	revise and edit draft MTC re resident admission contracts to reflect edits from GG, co-counsel	Other Motions
7/9/2019	Guy Wallace	0.5	\$1,350	\$675	review and analysis of D's proposed changes to letter brief; accompanying declarations	Other Motions
7/9/2019	Travis Close	0.4	\$850	\$340	Review Def's correspondance re: memory care, sampling, & draft stip re inspections	Case Organization, Planning and Strategy
7/9/2019	Travis Close	0.2	\$850	\$170	Call with JM re: scheduling Fountaingrove inspection	Case Organization, Planning and Strategy
7/9/2019	Travis Close	0.3	\$850	\$255	Meet w/ GBW re: further edits to joint letter brief	Case Organization, Planning and Strategy
7/9/2019	Travis Close	0.2	\$850	\$170	Further revisions to joint letter brief	Discovery (Non-Deposition)
7/10/2019	Guy Wallace	0.5	\$1,350	\$675	review and analysis of D's motion to stay claims of two plaintiffs	Appeal
7/10/2019	Guy Wallace	1.1	\$1,350	\$1,485	analysis of potential stipulation re inspection of rooms in ALFs; com's with MTJ re same	Discovery (Non-Deposition)
7/10/2019	Guy Wallace	0.8	\$1,350	\$1,080	analysis of D's strategy re discovery and "sampling"; implications for class certification	Discovery (Non-Deposition)
7/10/2019	Guy Wallace	1.1	\$1,350	\$1,485	revise and edit joint letter re production of resident agreements; com's with Buffaloe; Jensen; GG; MTJ re same	Other Motions
7/10/2019	Travis Close	0.2	\$850	\$170	Review Decs provided by Defs re: joint discovery dispute	Case Organization, Planning and Strategy
7/10/2019	Travis Close	0.4	\$850	\$340	Call w/ team to discuss inspections & discovery issues	Case Organization, Planning and Strategy
7/10/2019	Travis Close	0.2	\$850	\$170	Review/analyze Ds section "Argument, B" of opening appellate brief, including cited authority	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/11/2019	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re D's proposal for sampled discovery; preparation for hearing with MJ Beeler	Discovery (Non-Deposition)
7/11/2019	Mark Johnson	1.2	\$1,150	\$1,380	review and revise proposed stipulation re number of rooms subject to inspection and representative nature of same.	Discovery (Non-Deposition)
7/11/2019	Mark Johnson	0.3	\$1,150	\$345	call w/ COC Grunfield re strategy on proposed stipulation	Discovery (Non-Deposition)
7/11/2019	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re strategy on proposed stipulation re inspections.	Discovery (Non-Deposition)
7/11/2019	Mark Johnson	0.1	\$1,150	\$115	call w/ COC GG to OC Barker re meet and confer	Discovery (Non-Deposition)
7/11/2019	Mark Johnson	0.3	\$1,150	\$345	follow-up call w/ GG re meet and confer strategy and potential mtns to compel inspections of memory care units and and sufficient number of AL units; discoveyr on class contact info.	Discovery (Non-Deposition)
7/11/2019	Travis Close	0.2	\$850	\$170	Review MTJ's proposed edits to site inspection stipulation	Discovery (Non-Deposition)
7/12/2019	Guy Wallace	1.7	\$1,350	\$2,295	legal research and analysis of D's proposal for sampled discovery regarding class certification	Discovery (Non-Deposition)
7/12/2019	Mark Johnson	0.6	\$1,150	\$690	meet and confer call w/ OC, GG, TC re inspection of memory care units, number and type of AL units to be made available for inspection, stipulation re same	Discovery (Non-Deposition)
7/12/2019	Mark Johnson	0.2	\$1,150	\$230	pre-call w/ GG re strategy for meet and confer session w/ OC re inspections	Discovery (Non-Deposition)
7/12/2019	Mark Johnson	0.2	\$1,150	\$230	follow-up mtg w/ TC re results of meet and confer session w/ OC and preparation of stip and notice for class member contact info	Discovery (Non-Deposition)
7/12/2019	Mark Johnson	0.3	\$1,150	\$345	draft meet and confer email re 2nd set of RFPs and 1st set of rogs and proposed stip re disclosure of class IDs and contact information and notice to class members.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/12/2019	Travis Close	0.6	\$850	\$510	Meet w/ GBW, AMA re: protective order & confidentiality designation	Case Organization, Planning and Strategy
7/12/2019	Travis Close	0.6	\$850	\$510	Analysis of sampling outside wage/hour context	Case Organization, Planning and Strategy
7/12/2019	Travis Close	0.9	\$850	\$765	M&C w/ MTJ and opposing counsel	Case Organization, Planning and Strategy
7/12/2019	Travis Close	0.2	\$850	\$170	Debrief w/ MTJ after meet and confer call re: memory care and number of units to inspect	Case Organization, Planning and Strategy
7/12/2019	Travis Close	0.7	\$850	\$595	Analyze/update current schedule of inspections based on recent correspondence	Depositions
7/15/2019	Guy Wallace	0.5	\$1,350	\$675	review and analysis of draft letter brief re inspection of memory care units; com's with GG; MTJ re same	Other Motions
7/15/2019	Mark Johnson	1.8	\$1,150	\$2,070	review and edit draft opposition to stay proceedings pendign appeal	Appeal
7/15/2019	Mark Johnson	0.2	\$1,150	\$230	review and analyze ltr from OC re next document production; draft email to AML re processing same	Discovery (Non-Deposition)
7/15/2019	Mark Johnson	0.4	\$1,150	\$460	coms w/ AML, GBW and OC re issues related to latest document production and uploading same, getting quick review and index of productionl log on and download production	Discovery (Non-Deposition)
7/15/2019	Mark Johnson	2.3	\$1,150	\$2,645	review and revise letter brief iso mtn to compel access to memory care units for inspection.	Other Motions
7/15/2019	Travis Close	0.4	\$850	\$340	Research Brookdale website for representations re: memory care	Case Organization, Planning and Strategy
7/15/2019	Travis Close	0.7	\$850	\$595	Review judge beeler's decisions re: ordering class notice procedures & amend stip/notice to conform	Case Organization, Planning and Strategy
7/15/2019	Travis Close	1.0	\$850	\$850	Continue drafting stip of notice to class members	Discovery (Non-Deposition)
7/15/2019	Travis Close	1.3	\$850	\$1,105	Draft notice to class members	Discovery (Non-Deposition)
7/16/2019	Guy Wallace	1.4	\$1,350	\$1,890	prepare for and attend CMC with Judge Gilliam re case schedule	Case Management Conferences

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/16/2019	Guy Wallace	0.5	\$1,350	\$675	com's with Barker; Buffaloe; GG; MTJ re motion to compel re inspection of memory care; schedule re same	Discovery (Non-Deposition)
7/16/2019	Guy Wallace	0.6	\$1,350	\$810	com's with GG; MTJ; TCC re D's production of documents; site inspections; motions to compel	Discovery (Non-Deposition)
7/16/2019	Guy Wallace	1.3	\$1,350	\$1,755	legal research and analysis re sampling and discovery for purposes of class certification	Discovery (Non-Deposition)
7/16/2019	Guy Wallace	0.7	\$1,350	\$945	com's with Sandra Chan; Barker; GG; KAS; MTJ re mediation and selection of MJ Infante re same	Settlement
7/16/2019	Travis Close	0.6	\$850	\$510	Finish drafting proposed notice and stip of notice for putative class member contact info	Case Organization, Planning and Strategy
7/17/2019	Guy Wallace	2.5	\$1,350	\$3,375	preparation for hearing re motion re resident agreements and D's proposal re sampling	Other Motions
7/17/2019	Mark Johnson	2.7	\$1,150	\$3,105	travel to and appear at CMC; confer w/ GBW before re issues that might be addressed; confer w/ OC re discovery issues at hearing; mtg w/ GBW and GG after CMC re strategy.	Case Organization, Planning and Strategy
7/17/2019	Mark Johnson	1.0	\$1,150	\$1,150	prep for discovery hearing before MJ Beeler re residence agreements.	Discovery (Non-Deposition)
7/17/2019	Travis Close	2.3	\$850	\$1,955	Public transit to inspection in Redwood City (walk to BART, N-Judah to Caltrain, then catch the ECR)	Discovery (Non-Deposition)
7/17/2019	Travis Close	0.6	\$850	\$510	Redwood City inspection -- cancelled -- confer w/ opposing counsel and Expert	Discovery (Non-Deposition)
7/17/2019	Travis Close	2.9	\$850	\$2,465	Transit home from inspection (Walk to ECR bus, get off at belmont station, Uber ride -- car crash --- tow truck, ECR to Millbrae station, BART home)	Discovery (Non-Deposition)
7/18/2019	Guy Wallace	1.5	\$1,350	\$2,025	com's with GG; MTJ; Schwarz re D's proposed stipulation re sampled site inspections	Discovery (Non-Deposition)
7/18/2019	Guy Wallace	2.5	\$1,350	\$3,375	prepare for and travel to rescheduled hearing re discovery motion	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/18/2019	Guy Wallace	0.6	\$1,350	\$810	review and analysis of joint letter re issue of inspections of memory care units; com's with GG; MTJ; SC re same	Other Motions
7/18/2019	Travis Close	0.5	\$850	\$425	Coordinate proposed inspection dates with experts, co-counsel	Case Organization, Planning and Strategy
7/19/2019	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re meet and confer with D's re site inspections and issues re scope of same	Discovery (Non-Deposition)
7/19/2019	Mark Johnson	0.8	\$1,150	\$920	review D's section of memory care letter brief; com w/ GG re same; review and edit revised version of letter and final.	Motion for Summary Judgment / Adjudication
7/19/2019	Travis Close	0.8	\$850	\$680	Continue analyzing proposed dates for additional inspections	Case Organization, Planning and Strategy
7/19/2019	Travis Close	1.0	\$850	\$850	Begin drafting second notice of site inspections	Case Organization, Planning and Strategy
7/19/2019	Travis Close	0.4	\$850	\$340	Meet w/ MTJ re: inspections schedule	Discovery (Non-Deposition)
7/19/2019	Travis Close	0.3	\$850	\$255	Edits to MTJ's proposed m&c letter re: inspections	Discovery (Non-Deposition)
7/22/2019	Travis Close	0.4	\$850	\$340	Call with GW re: proposed dates for upcoming inspections	Case Organization, Planning and Strategy
7/22/2019	Travis Close	0.3	\$850	\$255	Email to experts re: additional inspections in August	Discovery (Non-Deposition)
7/22/2019	Travis Close	1.9	\$850	\$1,615	Coordinate/assign 23 of remaining facilities in CA for expert GW's inspection	Discovery (Non-Deposition)
7/22/2019	Travis Close	1.5	\$850	\$1,275	Coordinate/assign 23 of remaining facilities in CA for expert JM's inspection	Discovery (Non-Deposition)
7/24/2019	Guy Wallace	2.2	\$1,350	\$2,970	preparation for hearing with MJ Beeler re motion re form resident agreements	Other Motions
7/24/2019	Mark Johnson	0.3	\$1,150	\$345	com w/ GBW re status of site inspection dispute and plan for resolving same, follow-up with Defendants.	Discovery (Non-Deposition)
7/24/2019	Mark Johnson	0.2	\$1,150	\$230	emails w/ TC re site inspection schedule for new notice, review proposed schedules of experts	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/24/2019	Mark Johnson	0.5	\$1,150	\$575	review docs for hearing on MTC full set of residency agreements, including comparison of TAC allegations and responses.	Other Motions
7/24/2019	Mark Johnson	2.2	\$1,150	\$2,530	appear on motion to compel	Other Motions
7/24/2019	Mark Johnson	1.5	\$1,150	\$1,725	continue review of pleadings, ltr brief and cases; draft memo for GBW on major points to me made	Other Motions
7/24/2019	Travis Close	1.1	\$850	\$935	Coordinate/schedule proportionate share of remaining facility inspections for expert GW	Discovery (Non-Deposition)
7/25/2019	Guy Wallace	2.8	\$1,350	\$3,780	prepare for and attend hearing re discovery motions	Discovery (Non-Deposition)
7/25/2019	Guy Wallace	0.4	\$1,350	\$540	review and analysis of Order from MJ Beeler granting motions to compel; com's with MTJ; TCC re same	Discovery (Non-Deposition)
7/25/2019	Mark Johnson	0.5	\$1,150	\$575	mtg / GBW before hearing to discuss strategy	Other Motions
7/25/2019	Mark Johnson	1.8	\$1,150	\$2,070	travel to and from Court for motion to compel on memory care and residency agreementa	Other Motions
7/25/2019	Travis Close	0.3	\$850	\$255	Meet w/ LEC re: drafting second notice of inspection	Case Organization, Planning and Strategy
7/25/2019	Travis Close	0.4	\$850	\$340	Debrief with GBW and MTJ re: today's MTC conference (sampling & memory care)	Case Organization, Planning and Strategy
7/25/2019	Travis Close	0.3	\$850	\$255	Finish preparing draft 2nd notice of site inspections to send to LEC	Discovery (Non-Deposition)
7/29/2019	Guy Wallace	0.5	\$1,350	\$675	com's with GG; MTJ re further discovery issues; revise and edit letter to D's re site inspections and scope thereof	Discovery (Non-Deposition)
7/29/2019	Guy Wallace	0.3	\$1,350	\$405	com's with Barker; GG; KAS; MTJ re mediation with MJ Infante	Settlement
7/29/2019	Mark Johnson	2.4	\$1,150	\$2,760	draft ltr to OC re site inspsections	Discovery (Non-Deposition)
7/29/2019	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW and G Waters results of site inspections, common findings, preparation of list of same	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/30/2019	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ; TCC re status of discovery and next steps re meet and confer with D's re same and further motions to compel	Discovery (Non-Deposition)
7/30/2019	Mark Johnson	0.4	\$1,150	\$460	final revisions to ltr to OC re site inspections and notice re same; instructions to staff related to same.	Discovery (Non-Deposition)
7/30/2019	Mark Johnson	0.3	\$1,150	\$345	coms w/ TCC re history of site inspections; schedule for upcoming inspections, notice re same	Discovery (Non-Deposition)
7/30/2019	Mark Johnson	0.8	\$1,150	\$920	draft separate email demands to OC re (1) class contact information and meeting and conferring re 2nd wave of discovery; (2) resuming inspections of 3 facilities with memory care units, and (3) production of residency agreements per court order; com w/ /coc re same	Discovery (Non-Deposition)
7/30/2019	Mark Johnson	0.1	\$1,150	\$115	com w/ GCG re email discovery demands and site inspection schedule,	Discovery (Non-Deposition)
7/30/2019	Mark Johnson	0.4	\$1,150	\$460	call w/ J Mastin re common findings in site inspections; availability for additional inspections; ruling on memory care units.	Discovery (Non-Deposition)
7/30/2019	Travis Close	0.3	\$850	\$255	Edits to MTJ's M&C letter re: inspections	Case Organization, Planning and Strategy
7/30/2019	Travis Close	0.2	\$850	\$170	Email to expert re: analysis of proposed inspections	Case Organization, Planning and Strategy
7/30/2019	Travis Close	0.9	\$850	\$765	Create index/spreadsheet of docs produced and reviewed	Discovery (Non-Deposition)
7/31/2019	Mark Johnson	0.1	\$1,150	\$115	review draft supp declaration iso extension to file answering brief and com w/ COC re same	Appeal
7/31/2019	Mark Johnson	0.2	\$1,150	\$230	draft tentative agenda for planning mtg	Case Organization, Planning and Strategy
7/31/2019	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW re ESI, discovery priorities, agenda for planning meeting	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/31/2019	Mark Johnson	0.5	\$1,150	\$575	draft, finalize and send emails re class contact information, resumption of site inspections, production of residence agreements and production of ADA policies	Discovery (Non-Deposition)
7/31/2019	Mark Johnson	0.2	\$1,150	\$230	com w/ TCC re status of inspections and issue for planning meeting, review spreadsheet re same	Discovery (Non-Deposition)
7/31/2019	Mark Johnson	2.0	\$1,150	\$2,300	review and analysis of D's responses to 2 document requests and interrogatories	Discovery (Non-Deposition)
7/31/2019	Mark Johnson	0.1	\$1,150	\$115	prepare draft agenda for planning meeting re discovery, mtns to comepl, inspections, etc.	Discovery (Non-Deposition)
7/31/2019	Travis Close	1.3	\$850	\$1,105	Prepare chart of outstanding issues/inspection schedule	Discovery (Non-Deposition)
7/31/2019	Travis Close	0.5	\$850	\$425	Review recordings of july 25 discovery conference (audio file)	Discovery (Non-Deposition)
8/1/2019	Guy Wallace	2.7	\$1,350	\$3,645	prepare for and attend meeting with GG; BBK; JY; SC; MTJ; TCC; AMA re D's production of documents and areas of non-production; site inspections; and further subjects for meet and confer and MTCs	Discovery (Non-Deposition)
8/1/2019	Guy Wallace	0.4	\$1,350	\$540	com's with AMA re D's production to date and policies, operations manuals and training manuals	Discovery (Non-Deposition)
8/1/2019	Guy Wallace	0.2	\$1,350	\$270	com's with Chan; Barker; GG; KAS; MTJ re mediation	Settlement
8/1/2019	Mark Johnson	2.4	\$1,150	\$2,760	meeting of counsel to discuss site inspections, discovery, motions to compel, investigation and subpoenas	Case Organization, Planning and Strategy
8/1/2019	Mark Johnson	0.5	\$1,150	\$575	add to and revise proposed agenda for meeting of counsel; com w/ GBW (.1) re same	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/1/2019	Mark Johnson	1.1	\$1,150	\$1,265	draft email to OC Buffaloe responding to email re class contact information and Pioneer process, including review of history of communications re same	Discovery (Non-Deposition)
8/1/2019	Mark Johnson	0.2	\$1,150	\$230	add to and send email to OC Buffaloe re contact information and client IDs	Discovery (Non-Deposition)
8/1/2019	Mark Johnson	2.0	\$1,150	\$2,300	analyze site inspection notices and sheduling history, inspection history and incorporate into master facility spreadsheet.	Discovery (Non-Deposition)
8/1/2019	Mark Johnson	2.3	\$1,150	\$2,645	review discovery responses to 1st and 2nd set of doc requests and incorporate into master spreadsheet.	Discovery (Non-Deposition)
8/1/2019	Travis Close	1.2	\$850	\$1,020	Finish preparing for team meeting with co-counsel & organizing docs	Case Organization, Planning and Strategy
8/1/2019	Travis Close	0.3	\$850	\$255	Research possible new CA facilities not disclosed by defendants	Case Organization, Planning and Strategy
8/1/2019	Travis Close	0.5	\$850	\$425	Review DSS reports at Brookdale facilities describing review of resident files	Case Organization, Planning and Strategy
8/1/2019	Travis Close	2.2	\$850	\$1,870	Team meeting w/ GCG, JY, MTJ, AMA, GBW	Case Organization, Planning and Strategy
8/1/2019	Travis Close	0.5	\$850	\$425	Finish listening to J. Beeler's discovery dispute hearing (audio file)	Discovery (Non-Deposition)
8/2/2019	Travis Close	0.7	\$850	\$595	Emails to MTJ, opposing counsel, and experts re: Defendants' latest proposed inspection schedules	Depositions
8/2/2019	Travis Close	1.0	\$850	\$850	Continue filling in details of inspections into organizational chart	Discovery (Non-Deposition)
8/5/2019	Mark Johnson	6.7	\$1,150	\$7,705	work on section of joint letter brief re class contact information; research law and prior correspondence re same	Other Motions
8/5/2019	Travis Close	0.1	\$850	\$85	Email to opposing counsel re: schedule of Fountaingrove facility	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/5/2019	Travis Close	0.5	\$850	\$425	Research case authority on opt out procedures for class discovery	Case Organization, Planning and Strategy
8/5/2019	Travis Close	0.7	\$850	\$595	Research issue of arbitration agreement class members receiving class notice	Case Organization, Planning and Strategy
8/5/2019	Travis Close	1.3	\$850	\$1,105	Research into current Fountaingrove facility info	Discovery (Non-Deposition)
8/6/2019	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re discovery and meet and confer with D's re various disputes including class member contact information	Discovery (Non-Deposition)
8/6/2019	Mark Johnson	0.3	\$1,150	\$345	call w/ S Colby re language of DSS subpoenas for facility files, identification of doc requests requiring search terms and development of search terms	Discovery (Non-Deposition)
8/6/2019	Mark Johnson	1.8	\$1,150	\$2,070	draft correspondence to OC responding to email from Buffaloe re class contact information, meet and confer; current position re same; confer w/ COC re same (.3), revise , finalize and send	Discovery (Non-Deposition)
8/6/2019	Mark Johnson	0.2	\$1,150	\$230	com w/ TCC re investigation into ownership and managment of fountaingrove facilitiy for potential pre-site inspection communication.	Discovery (Non-Deposition)
8/6/2019	Mark Johnson	0.4	\$1,150	\$460	discussions w/ AML re scope of production of residency agreements, source of same, including un-bates numbered agreements for correspondence to Ds re searwching for and producing remaining residency agreements.	Discovery (Non-Deposition)
8/6/2019	Mark Johnson	0.1	\$1,150	\$115	call w/ GCG re inspection schedule, potential access to rooms of specific residents at Fountaingrove known wy Stacy Grant.	Discovery (Non-Deposition)
8/6/2019	Travis Close	1.2	\$850	\$1,020	Research whether plaintiffs who signed arbitration agreements may receive class notice papers	Discovery (Non-Deposition)
8/6/2019	Travis Close	0.5	\$850	\$425	Review Ds records proposed in response to RFP 10	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/6/2019	Travis Close	0.2	\$850	\$170	Analyze which facilities inspections Ps owe Ds dates for and vice versa	Discovery (Non-Deposition)
8/7/2019	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re motion to compel class member contact information; review and analysis of email from Jensen re same	Discovery (Non-Deposition)
8/7/2019	Mark Johnson	0.8	\$1,150	\$920	draft task list and assignments based on discussion at recent strategy mtg	Case Organization, Planning and Strategy
8/7/2019	Mark Johnson	0.2	\$1,150	\$230	com w/ GBW re strategy for addressing arbitration issue as a basis for limiting discovery	Discovery (Non-Deposition)
8/7/2019	Travis Close	0.1	\$850	\$85	Meet w/ AML re: indexing Brookdale policies	Case Organization, Planning and Strategy
8/7/2019	Travis Close	0.2	\$850	\$170	Review index of Ds policies and procedures	Case Organization, Planning and Strategy
8/7/2019	Travis Close	0.2	\$850	\$170	Review proposed emails by MTJ re: discovery and doc review issues	Discovery (Non-Deposition)
8/8/2019	Guy Wallace	0.4	\$1,350	\$540	com's with GG; MTJ re site inspections	Discovery (Non-Deposition)
8/8/2019	Guy Wallace	0.2	\$1,350	\$270	com's with MTJ re D's proposal to exclude putative class members who may be subject to arbitration agreements from discovery	Discovery (Non-Deposition)
8/8/2019	Guy Wallace	0.4	\$1,350	\$540	review and analysis of letter from JNK re site inspections	Discovery (Non-Deposition)
8/8/2019	Mark Johnson	2.8	\$1,150	\$3,220	read cases cited by OC in email D's position on discovery of class member contact information and research re same	Discovery (Non-Deposition)
8/8/2019	Mark Johnson	1.0	\$1,150	\$1,150	work on draft response to Ds re discovery of class contact information	Discovery (Non-Deposition)
8/8/2019	Mark Johnson	0.3	\$1,150	\$345	mtgs and emails w/ AML re status of production categories of documents in 1st set of RPDs	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/8/2019	Mark Johnson	0.2	\$1,150	\$230	coms w/ COC re D's cancellation of Fountaingrove inspection; coms w/ TCC re follow-up w/ GWaters re same and re Chanate inspection.	Discovery (Non-Deposition)
8/8/2019	Travis Close	0.3	\$850	\$255	Review schedules/cancellations for Brookdale Fountaingrove	Case Organization, Planning and Strategy
8/8/2019	Travis Close	0.8	\$850	\$680	Research legal standard for readily achievable	Case Organization, Planning and Strategy
8/8/2019	Travis Close	1.0	\$850	\$850	Reseach Brookdale financial status through SEC documents	Case Organization, Planning and Strategy
8/8/2019	Travis Close	1.1	\$850	\$935	Continue researching Brookdale financials from other publicly filed documents	Case Organization, Planning and Strategy
8/8/2019	Travis Close	0.4	\$850	\$340	Email to expert re: upcoming inspection Chanate and Fountaingrove	Discovery (Non-Deposition)
8/9/2019	Guy Wallace	0.6	\$1,350	\$810	review and analysis of JNK letter re site inspections; com's with MTJ re same	Discovery (Non-Deposition)
8/9/2019	Guy Wallace	0.5	\$1,350	\$675	revise and edit meet and confer email from MTJ to Jensen re putative class member contact information; com's with MTJ re same	Discovery (Non-Deposition)
8/9/2019	Mark Johnson	0.2	\$1,150	\$230	call w/ Sandy Grant re residents at Fountaingrove	Discovery (Non-Deposition)
8/9/2019	Travis Close	0.7	\$850	\$595	Continue researching brookdale's financial status through public filings	Case Organization, Planning and Strategy
8/12/2019	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ; BU re subpoenas for DSS files re Brookdale's ALFs	Discovery (Non-Deposition)
8/12/2019	Travis Close	0.4	\$850	\$340	Schedule further dates for inspection for August with expert	Discovery (Non-Deposition)
8/12/2019	Travis Close	0.1	\$850	\$85	Email to MTJ re: proposed inspections	Discovery (Non-Deposition)
8/12/2019	Travis Close	0.3	\$850	\$255	Update facility inspection chart	Discovery (Non-Deposition)
8/12/2019	Travis Close	0.2	\$850	\$170	Review JK's letter re: facility inspections	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/13/2019	Guy Wallace	0.7	\$1,350	\$945	prepare for and participate in tc with Barker; Buffaloe; Jensen; Peters; MTJ; TCC re contact information for putative class members	Discovery (Non-Deposition)
8/13/2019	Mark Johnson	1.9	\$1,150	\$2,185	work on draft Rule 30(b)(6) depo notice	Depositions
8/13/2019	Mark Johnson	0.5	\$1,150	\$575	meet and confer call w/ Barker, Buffaloe, Jensen, Peters and GBW, TCC for plaintiffs re production of class contact information	Discovery (Non-Deposition)
8/13/2019	Mark Johnson	0.2	\$1,150	\$230	debriefing call w/ GBW and TCC following meet and confer call and issues raised by proposed use of random sample.	Discovery (Non-Deposition)
8/13/2019	Mark Johnson	0.2	\$1,150	\$230	mtg w/ TCC re preparation of DSS subpoenas	Discovery (Non-Deposition)
8/13/2019	Mark Johnson	0.1	\$1,150	\$115	review samples of DSS subpoenas	Discovery (Non-Deposition)
8/13/2019	Mark Johnson	0.5	\$1,150	\$575	call w/ G Kawamoto & TCC re scope of subjpoenas on DSS for facilitiy files; content of files and tips for meeting and conferring w/ DSS staff/attorneys re production of same.	Discovery (Non-Deposition)
8/13/2019	Mark Johnson	1.7	\$1,150	\$1,955	further revisions to draft joint letter re class member contact information	Discovery (Non-Deposition)
8/13/2019	Mark Johnson	0.3	\$1,150	\$345	prep for meet and confer w/ OC re class contact information; provide background to GBW	Discovery (Non-Deposition)
8/13/2019	Mark Johnson	0.2	\$1,150	\$230	draft email to S McBrayer re site inspection schedule and availablity, with notices enclosed.	Experts (Including Retention)
8/13/2019	Travis Close	0.3	\$850	\$255	Debrief w/ MTJ and GBW following meet and confer call re: class contact list	Case Organization, Planning and Strategy
8/13/2019	Travis Close	0.4	\$850	\$340	Call w/ MTJ and co-counsel re: strategy for serving subpoenas	Case Organization, Planning and Strategy
8/13/2019	Travis Close	0.3	\$850	\$255	Email to LEC re: instructions for drafting subpoenas	Case Organization, Planning and Strategy
8/13/2019	Travis Close	0.6	\$850	\$510	Meet & confer phone call with opposing counsel re: class contact info	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/13/2019	Travis Close	0.9	\$850	\$765	Compile in master spreadshee appropriate DSS regional facility for each Brookdale facility	Discovery (Non-Deposition)
8/13/2019	Travis Close	0.5	\$850	\$425	Compile in master spreadsheet appropriate DSS regional facility for each Brookdale facility	Discovery (Non-Deposition)
8/14/2019	Mark Johnson	0.2	\$1,150	\$230	review and analyze list from Mastin of common violations identified accross facilities	Discovery (Non-Deposition)
8/14/2019	Travis Close	1.4	\$850	\$1,190	Continue filling in appropriate regional DSS facility into brookdale facility chart	Case Organization, Planning and Strategy
8/14/2019	Travis Close	0.3	\$850	\$255	Meet w/ LEC re: drafting subpoenas to DSS	Case Organization, Planning and Strategy
8/14/2019	Travis Close	0.8	\$850	\$680	Continue filling in appropriate regional DSS facility into brookdale facility chart	Case Organization, Planning and Strategy
8/15/2019	Travis Close	0.4	\$850	\$340	Review FRCP 45 in issuing subpoenas	Case Organization, Planning and Strategy
8/15/2019	Travis Close	0.2	\$850	\$170	Meet w/ MTJ re: service of subpoena to inspect facilities	Case Organization, Planning and Strategy
8/15/2019	Travis Close	0.6	\$850	\$510	Continue drafting notice of subpoena and subpoena to inspect facilities	Case Organization, Planning and Strategy
8/15/2019	Travis Close	0.2	\$850	\$170	Meet w/ MTJ re: JAMS mediation session	Case Organization, Planning and Strategy
8/15/2019	Travis Close	0.4	\$850	\$340	Edits to MTJ's meet and confer letter re: inspections	Discovery (Non-Deposition)
8/15/2019	Travis Close	1.1	\$850	\$935	Draft subpoenas to permit site inspections at former Vacaville and Fountaingrove facilities	Discovery (Non-Deposition)
8/15/2019	Travis Close	1.1	\$850	\$935	Research facility info, contact info, and service of process for facilities to be subpoenaed	Discovery (Non-Deposition)
8/15/2019	Travis Close	0.6	\$850	\$510	Edit draft subpoenas to inspect documents (DSS) by LEC	Discovery (Non-Deposition)
8/15/2019	Travis Close	1.4	\$850	\$1,190	Research service of process for subpoenas	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/16/2019	Mark Johnson	0.5	\$1,150	\$575	call w/ OC, TCC, GBW re production of class contact information, sampling and source issues, timing, proposed format and form of order	Discovery (Non-Deposition)
8/16/2019	Mark Johnson	0.3	\$1,150	\$345	prep for meet and confer call w/ OC, including discussion w/ GBW re issues to be addressed.	Discovery (Non-Deposition)
8/16/2019	Mark Johnson	0.4	\$1,150	\$460	mtg w/ GBW & TCC re discovery tasks - ESI search term develoment, site inspection meet and confer and mtn to compel, DSS subpoenas, mtn to compel discrete categories from 1st set of document requests.	Discovery (Non-Deposition)
8/16/2019	Mark Johnson	0.5	\$1,150	\$575	mtgs w/ TCC, Lourdes C. re DSS subpoenas, site inspection subpoenas	Discovery (Non-Deposition)
8/16/2019	Travis Close	0.3	\$850	\$255	Call with potential class member re: questions on applicability of ADA	Case Organization, Planning and Strategy
8/16/2019	Travis Close	0.2	\$850	\$170	Call with client Rita Stiner re: case update	Case Organization, Planning and Strategy
8/16/2019	Travis Close	0.7	\$850	\$595	Edits to LEC's draft attachment to dss subpoena	Case Organization, Planning and Strategy
8/16/2019	Travis Close	0.5	\$850	\$425	Meet and confer call w/ GBW, MTJ, OC re: class member contact info	Case Organization, Planning and Strategy
8/16/2019	Travis Close	0.5	\$850	\$425	Meet w/ MTJ, GBW following m&c call re: strategy for obtaining discovery	Case Organization, Planning and Strategy
8/16/2019	Travis Close	0.5	\$850	\$425	Email to team re: report from potential class member/witness phone call	Class Outreach and Contact
8/19/2019	Guy Wallace	0.3	\$1,350	\$405	com's with Chan re mediation and confirmation of same	Settlement
8/19/2019	Mark Johnson	0.7	\$1,150	\$805	call (.3) and email exchange (.4) w/ GBW re strategy for addressing arbitration agreement issue before, on or after class certification mtn	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/19/2019	Mark Johnson	0.6	\$1,150	\$690	call (.2) and emails (.4) w/ Titan legal services operations manager re service of subpoenas on DSS, location for production, Bates numbering, first look for defendants if demanded.	Discovery (Non-Deposition)
8/19/2019	Mark Johnson	1.8	\$1,150	\$2,070	overview preparation of DSS subpoenas, including meetings w/ TCC and LC re format, timing and date of return on subpoenas, review of subpoenas and attachments and notice, questions re propoer offices to serve for each brookdae facilities, edits to notice and subpoenas, final review and signatures,	Discovery (Non-Deposition)
8/19/2019	Mark Johnson	2.0	\$1,150	\$2,300	work on demand ltr to OC re specific docs to be produced in respose to RFP1, with bacground; review note of prior meet and confer sessions, rfps and prior analysis of same and production	Discovery (Non-Deposition)
8/19/2019	Mark Johnson	1.8	\$1,150	\$2,070	review docs from doc production identified as policy docs, including docs related to persona assessment system.	Discovery (Non-Deposition)
8/19/2019	Travis Close	0.1	\$850	\$85	Meet w/ MTJ re: coordination of subpoenas	Case Organization, Planning and Strategy
8/19/2019	Travis Close	0.2	\$850	\$170	Compile list of unique DSS regional facilities for MTJ for subpoena	Case Organization, Planning and Strategy
8/19/2019	Travis Close	0.2	\$850	\$170	Review LEC's draft form subpoena	Case Organization, Planning and Strategy
8/19/2019	Travis Close	0.2	\$850	\$170	Edits to LEC's draft notice attachment	Case Organization, Planning and Strategy
8/19/2019	Travis Close	0.9	\$850	\$765	Research on jurisdiction of el segundo/monterey park dss facilities	Case Organization, Planning and Strategy
8/19/2019	Travis Close	0.6	\$850	\$510	Review DSS records for Brookdale Santa Monica and Santa Monica Gardens	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/19/2019	Travis Close	0.1	\$850	\$85	Email to MJ re: inspections scheduled this week	Case Organization, Planning and Strategy
8/19/2019	Travis Close	0.4	\$850	\$340	Edits to notice of subpoena	Discovery (Non-Deposition)
8/19/2019	Travis Close	0.9	\$850	\$765	Further edits to subpoena attachments	Discovery (Non-Deposition)
8/19/2019	Travis Close	0.2	\$850	\$170	Meet w/ MTJ, LEC re: mailing subpoenas	Discovery (Non-Deposition)
8/19/2019	Travis Close	0.7	\$850	\$595	Coordinate printing of subpoenas and communication with third party service	Discovery (Non-Deposition)
8/20/2019	Guy Wallace	0.3	\$1,350	\$405	review and analysis of D's proposed stipulation re class member contact information; com's with MTJ re same	Discovery (Non-Deposition)
8/20/2019	Guy Wallace	0.6	\$1,350	\$810	com's with Waters re access standards that potentially apply to D's ALFs	Misc. Research
8/20/2019	Travis Close	0.2	\$850	\$170	Meet w/ AMA and JMP re: help with joint letter to Ds (doc production)	Case Organization, Planning and Strategy
8/20/2019	Travis Close	0.3	\$850	\$255	Meet w/ MTJ re: help with joint letter to Ds (doc production)	Case Organization, Planning and Strategy
8/20/2019	Travis Close	0.5	\$850	\$425	Analyze doc requests specified & met and conferred about in prior correspondence with Defs	Case Organization, Planning and Strategy
8/20/2019	Travis Close	0.3	\$850	\$255	Emails to expert and opposing counsel re: upcoming inspections for late August	Discovery (Non-Deposition)
8/20/2019	Travis Close	0.4	\$850	\$340	Email to JMP re: assignment for identifying docs produced by RFP #	Discovery (Non-Deposition)
8/20/2019	Travis Close	1.6	\$850	\$1,360	Meet w/ MTJ and JMP re: analyzing doc request to determine what Ds have produced	Discovery (Non-Deposition)
8/21/2019	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re site inspections of D's facilities and procedures, schedule and meet and confer process re same	Discovery (Non-Deposition)
8/21/2019	Travis Close	0.2	\$850	\$170	Call to expert GW re: inspection availability	Case Organization, Planning and Strategy
8/21/2019	Travis Close	0.2	\$850	\$170	Meet w/ MTJ re: upcoming inspections	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/21/2019	Travis Close	1.0	\$850	\$850	Doc Rev -- assessment data -- # BKD0002222-BKD0002240 (1-19 of 65)	Discovery (Non-Deposition)
8/21/2019	Travis Close	1.0	\$850	\$850	Doc Rev -- assessment data -- # BKD0002240-BKD0002262 (19-41 of 65)	Discovery (Non-Deposition)
8/21/2019	Travis Close	1.0	\$850	\$850	Doc Rev -- assessment data -- # BKD0002262-BKD0002287 (41-65 of 65)	Discovery (Non-Deposition)
8/22/2019	Guy Wallace	0.3	\$1,350	\$405	tc with Waters re results of inspections of Brookdale facilities, including Brookdale San Ramon	Discovery (Non-Deposition)
8/22/2019	Guy Wallace	0.5	\$1,350	\$675	analysis of issue of number of units to inspect in Brookdale facilities; com's with MTJ re same	Discovery (Non-Deposition)
8/22/2019	Mark Johnson	0.2	\$1,150	\$230	com w/ GBW re proposed stip re class contact information; make additional revision and draft and send cover email to OC re same	Discovery (Non-Deposition)
8/22/2019	Mark Johnson	0.7	\$1,150	\$805	call w/ OC JK and RG re site inspection stipulation and scope of inspections	Discovery (Non-Deposition)
8/22/2019	Mark Johnson	0.4	\$1,150	\$460	follow up call/com w/ COC GG and TCC re site inspection issue re scope and proposed stipulation	Discovery (Non-Deposition)
8/22/2019	Mark Johnson	0.3	\$1,150	\$345	prep for call w/ OC re scope of site inspections, possible stipulation re same, including review of prior 3 letters and last redlined version of draft stipulation	Discovery (Non-Deposition)
8/22/2019	Mark Johnson	0.2	\$1,150	\$230	confer w/ TCC re analysis of protective order and D's position that should have been served with subpoenas	Discovery (Non-Deposition)
8/22/2019	Mark Johnson	0.4	\$1,150	\$460	review email from OC re service of protective order with DSS subpoenas; review and analyze protective order an Rule 45 re same	Discovery (Non-Deposition)
8/22/2019	Travis Close	1.0	\$850	\$850	Call with opposing counsel re: meet and confer on site inspections	Case Organization, Planning and Strategy
8/22/2019	Travis Close	0.1	\$850	\$85	Meet w/ MTJ re: organization of key docs produced by Ds	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/22/2019	Travis Close	1.1	\$850	\$935	Doc Rev -- resident files -- # CTRL0000188-CTRL0000202 (1-15 of 293)	Discovery (Non-Deposition)
8/22/2019	Travis Close	0.2	\$850	\$170	Meet w/ MTJ re: protective order issue in subpoena	Discovery (Non-Deposition)
8/22/2019	Travis Close	1.0	\$850	\$850	Doc Rev -- resident files -- # CTRL0000202-:CTRL0000215 (15-30 of 293)	Discovery (Non-Deposition)
8/22/2019	Travis Close	0.4	\$850	\$340	Meet with MTJ, GG re: debrief after m&c phone call on site inspections	Discovery (Non-Deposition)
8/22/2019	Travis Close	1.0	\$850	\$850	Doc Rev -- resident files -- # CTRL0000215-CTRL0000231 (30-46 of 293)	Discovery (Non-Deposition)
8/22/2019	Travis Close	1.0	\$850	\$850	Doc Rev -- resident files -- # CTRL0000231-CTRL0000242 (46-64 of 293)	Discovery (Non-Deposition)
8/23/2019	Guy Wallace	0.4	\$1,350	\$540	review and analysis of draft of stipulation re scope of site inspections; com's with MTJ re same	Discovery (Non-Deposition)
8/23/2019	Guy Wallace	0.4	\$1,350	\$540	com's with GG; MTJ re preparation for mediation with MJ Infante	Settlement
8/26/2019	Mark Johnson	0.1	\$1,150	\$115	com w/ GBW re inspection issues, attorney accompanying Mastin inspection.	Discovery (Non-Deposition)
8/26/2019	Mark Johnson	0.4	\$1,150	\$460	mttg w/ TCC re attending site inspections this week of El Segundo and Redwood City; conversations w/ expert; review of residency agreements and preparation of database or spreadsheet for analysis of same.	Discovery (Non-Deposition)
8/26/2019	Mark Johnson	0.2	\$1,150	\$230	follow up emails re proposals and instructions for reservice of subpoenas on El Segundo / Monterey Park facilities.	Discovery (Non-Deposition)
8/26/2019	Mark Johnson	0.4	\$1,150	\$460	email echanges (x3) with process servers and Titan Legal Services manager re issues with service of subpoenas.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/26/2019	Mark Johnson	0.2	\$1,150	\$230	email exchanges re call concerning contact information for class members; meet and conferring re inspection protocol and scope	Discovery (Non-Deposition)
8/26/2019	Mark Johnson	1.0	\$1,150	\$1,150	continue working on memo re authority to bind patient to arbitration with POA	Discovery (Non-Deposition)
8/26/2019	Travis Close	0.4	\$850	\$340	Meet w/ MTJ re: attending inspections this week (Corona/Redwood city)	Case Organization, Planning and Strategy
8/26/2019	Travis Close	0.1	\$850	\$85	Meet w/ AML re: residency agreement assignment	Case Organization, Planning and Strategy
8/26/2019	Travis Close	0.4	\$850	\$340	Email to JMP re: residency agreement tracking assignment	Case Organization, Planning and Strategy
8/26/2019	Travis Close	0.7	\$850	\$595	Book flight and hotel to Brookdale Corona inspection	Discovery (Non-Deposition)
8/26/2019	Travis Close	0.4	\$850	\$340	Search for non-brookdale residency agreements on Relativity	Discovery (Non-Deposition)
8/26/2019	Travis Close	1.3	\$850	\$1,105	Travel from work to SFO airport to attend Corona inspection	Discovery (Non-Deposition)
8/26/2019	Travis Close	3.0	\$850	\$2,550	Flight from SFO to Ontario airport to attend Corona inspection	Discovery (Non-Deposition)
8/26/2019	Travis Close	0.4	\$850	\$340	Taxi from Ontario airport to hotel in Corona	Discovery (Non-Deposition)
8/27/2019	Travis Close	0.3	\$850	\$255	Travel from hotel to Corona facility for inspection	Discovery (Non-Deposition)
8/27/2019	Travis Close	0.2	\$850	\$170	Meet with expert to discuss strategy before inspection	Discovery (Non-Deposition)
8/27/2019	Travis Close	7.0	\$850	\$5,950	Inspection at Corona facility with JM and MP	Discovery (Non-Deposition)
8/27/2019	Travis Close	0.5	\$850	\$425	Taxi from Corona facility to Ontario airport	Discovery (Non-Deposition)
8/27/2019	Travis Close	2.8	\$850	\$2,380	Flight from Ontario airport to SFO airport	Discovery (Non-Deposition)
8/27/2019	Travis Close	1.4	\$850	\$1,190	Travel from SFO airport to home	Discovery (Non-Deposition)
8/28/2019	Guy Wallace	0.2	\$1,350	\$270	review and analysis of draft stipulation re production of class member contact information from Barker; com with MTJ re same	Discovery (Non-Deposition)
8/28/2019	Travis Close	0.3	\$850	\$255	Meet w/ JMP re: identifying resident agreements produced	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/28/2019	Travis Close	0.4	\$850	\$340	Meet w/ MTJ re: debrief after yesterday's inspection; production of contact info	Case Organization, Planning and Strategy
8/28/2019	Travis Close	0.4	\$850	\$340	Research prior DSS complaint reports at Brookdale Corona	Case Organization, Planning and Strategy
8/28/2019	Travis Close	1.0	\$850	\$850	Doc Rev -- resident files -- # CTRL0000254-CTRL0000266 (76-89 of 293)	Discovery (Non-Deposition)
8/28/2019	Travis Close	1.0	\$850	\$850	Doc Rev -- recent production -- # BKD0002287-BKD0023634 (1-16 of 16)	Discovery (Non-Deposition)
8/28/2019	Travis Close	0.8	\$850	\$680	Doc Rev -- resident files -- # CTRL0000266-CTRL0000279 (89-102 of 293)	Discovery (Non-Deposition)
8/28/2019	Travis Close	1.1	\$850	\$935	Doc Rev -- resident files -- # CTRL0000242-CTRL0000254 (64-76 of 293)	Imported
8/29/2019	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re site inspections and analysis of use of additional access experts	Discovery (Non-Deposition)
8/29/2019	Mark Johnson	0.3	\$1,150	\$345	call w/ George Kawamoto re strategy for negotiating scope of DSS production pursuant to subpoena.	Discovery (Non-Deposition)
8/29/2019	Mark Johnson	0.1	\$1,150	\$115	draft email to Barker re draft stipulation re class contacts and inspection schedule.	Discovery (Non-Deposition)
8/30/2019	Mark Johnson	0.4	\$1,150	\$460	com w/ GG re Ds proposed redline of stip re inspections	Discovery (Non-Deposition)
8/30/2019	Travis Close	1.0	\$850	\$850	Doc Rev -- resident files -- # CTRL0000279-CTRL0000290 (102-115 of 293)	Discovery (Non-Deposition)
8/30/2019	Travis Close	1.0	\$850	\$850	Doc Rev -- resident files -- # CTRL0000290-CTRL0000303 (115-131 of 293)	Discovery (Non-Deposition)
8/30/2019	Travis Close	0.2	\$850	\$170	Review Ds objections to site notices and MTJ's response	Discovery (Non-Deposition)
8/30/2019	Travis Close	1.0	\$850	\$850	Doc Rev -- resident files -- # CTRL0000303-CTRL0000315 (131-143 of 293)	Discovery (Non-Deposition)
8/30/2019	Travis Close	0.4	\$850	\$340	Call w/ GCG and MTJ re: draft stipulation for inspections	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/3/2019	Mark Johnson	0.2	\$1,150	\$230	com w/ DSS counsel re production of subpoenaed documents	Discovery (Non-Deposition)
9/3/2019	Mark Johnson	0.2	\$1,150	\$230	call w/ G Waters re communications w/ OC	Discovery (Non-Deposition)
9/3/2019	Mark Johnson	0.2	\$1,150	\$230	email to OC Barker, et al. re stipulation re class contact information, information re change in ownership status for Brookdale facilities.	Discovery (Non-Deposition)
9/3/2019	Travis Close	1.0	\$850	\$850	Doc Rev -- resident files -- # CTRL0000315-CTRL0000888 (143-156 of 293)	Discovery (Non-Deposition)
9/3/2019	Travis Close	1.0	\$850	\$850	Doc Rev -- resident files -- # CTRL0000888-CTRL0000904 (156-172 of 293)	Discovery (Non-Deposition)
9/3/2019	Travis Close	1.2	\$850	\$1,020	Continue sorting/tagging docs with residency agreements	Discovery (Non-Deposition)
9/3/2019	Travis Close	1.5	\$850	\$1,275	Finish identifying residency agreements from large resident files (Brookdale, Emeritus, Merrill Gardens)	Discovery (Non-Deposition)
9/3/2019	Travis Close	0.2	\$850	\$170	Follow-up call w/ expert SM re: code application	Discovery (Non-Deposition)
9/4/2019	Mark Johnson	1.5	\$1,150	\$1,725	further review of D's responses to first set of RFPs and continue drafting demand / meet and confer letter re same	Discovery (Non-Deposition)
9/4/2019	Mark Johnson	0.2	\$1,150	\$230	email exchange with Titan Legal Services re subpoenas, contact with DSS attorney and planned follow up	Discovery (Non-Deposition)
9/4/2019	Mark Johnson	0.8	\$1,150	\$920	review and draft response to email from OC Jeff K re cancellation and rescheduling of inspections, ownership changes, need to seek court direction re inspection scope and protocol	Discovery (Non-Deposition)
9/4/2019	Mark Johnson	0.1	\$1,150	\$115	com w/ COC GG re status and strategy of inspection scheduling and demands, document production issues.	Discovery (Non-Deposition)
9/5/2019	Guy Wallace	0.5	\$1,350	\$675	review and analysis of parties' proposed stipulations re site inspections; com's with MTJ re same and status of meet and confer	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/5/2019	Mark Johnson	0.1	\$1,150	\$115	draft email to TCC, staff re research to be done on facilities sold by Brookdale and subpoenas to be served.	Discovery (Non-Deposition)
9/5/2019	Mark Johnson	0.1	\$1,150	\$115	com w/ GBW re discovery on arbitration agreements.	Discovery (Non-Deposition)
9/6/2019	Guy Wallace	1.3	\$1,350	\$1,755	prepare for and participate in tc with Barker; JNK; BB; MTJ; TCC re site inspections and parties' proposed stipulations re same	Discovery (Non-Deposition)
9/6/2019	Mark Johnson	1.3	\$1,150	\$1,495	telephonic meet and confer w/ OC Barker, Jeff K,, Buffaloe , Peters and TCC, GBW re site inspections and potential stipulation	Discovery (Non-Deposition)
9/6/2019	Mark Johnson	0.5	\$1,150	\$575	folllow up call w/ GBW, TCC re 3 issues identified in meet and confer w/ OC re site inspection potential stipulation to deleop approach and prposed language on each.	Discovery (Non-Deposition)
9/6/2019	Mark Johnson	0.3	\$1,150	\$345	mtg w/ TCC re site inspection schedule, expert availability and potential conflicts	Discovery (Non-Deposition)
9/6/2019	Mark Johnson	0.2	\$1,150	\$230	mtg w/ TCC re status of residence agreement analysis and specific language to look for and track w/r/t misrepresentations and arbitration clauses	Discovery (Non-Deposition)
9/6/2019	Mark Johnson	0.4	\$1,150	\$460	draft email to OC with 3 propoed suggestions for language to be included in potential stipulation regarding inspections	Discovery (Non-Deposition)
9/6/2019	Mark Johnson	2.0	\$1,150	\$2,300	begin review of service alignment and policy docs	Discovery (Non-Deposition)
9/6/2019	Travis Close	0.5	\$850	\$425	Meet w/ MTJ before call with opposing counsel re: inspections and stipulation	Case Organization, Planning and Strategy
9/6/2019	Travis Close	1.5	\$850	\$1,275	Update database with info on new ownership of former communities	Case Organization, Planning and Strategy
9/6/2019	Travis Close	1.8	\$850	\$1,530	Draft subpoenas to permit site inspections for former Brookdale communities (magnolia place, arbol residences, pacifica, villa de anza, magnolia court)	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/6/2019	Travis Close	0.6	\$850	\$510	Edits to MTJ's letter re: missing docs not produced by Ds	Case Organization, Planning and Strategy
9/6/2019	Travis Close	1.3	\$850	\$1,105	Call w/ MTJ, GBW, and opposing counsel re: stipulation and other issues	Discovery (Non-Deposition)
9/6/2019	Travis Close	0.4	\$850	\$340	Post-call discussing w/ MTJ, GBW re: crafting final stipulation re: inspections	Discovery (Non-Deposition)
9/6/2019	Travis Close	1.0	\$850	\$850	Doc Rev -- resident files -- # CTRL0000904-CTRL0000922 (172-190 of 293)	Discovery (Non-Deposition)
9/9/2019	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of draft stipulation and proposed Order re site inspections; com's with MTJ re same (.4)	Discovery (Non-Deposition)
9/9/2019	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re RFP seeking all resident agreements; letter to D's re non-produced categories of documents; need to set deadline for D's to complete their rolling production	Discovery (Non-Deposition)
9/9/2019	Mark Johnson	0.8	\$1,150	\$920	review arbitration clauses in residency agreements	Class Certification
9/9/2019	Mark Johnson	0.2	\$1,150	\$230	com w/ Jenny Y re history of arbitration clauses in Brookdale residency agreements.	Class Certification
9/9/2019	Mark Johnson	0.8	\$1,150	\$920	work from D's redline to create revised redline version of stipulation concerning site inspections.	Discovery (Non-Deposition)
9/9/2019	Mark Johnson	0.4	\$1,150	\$460	review revised stip from OC JK re inspections and cover meail explanation re same; identify problems with same and com w/ COC GBW, GG re same	Discovery (Non-Deposition)
9/9/2019	Mark Johnson	0.2	\$1,150	\$230	review and responde to DSS counsel re proposed extension of time to comply with subpoena and justification for same, questions re files and privacy issues.	Discovery (Non-Deposition)
9/9/2019	Mark Johnson	0.1	\$1,150	\$115	email exchange w/ Gay G re potential edits to demand ltr re complaint discovery	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/9/2019	Mark Johnson	0.3	\$1,150	\$345	mtg w/ TCC to discuss current schedule for site inspections, plan going forward, information to include in stipulation to facilitate scheduling	Discovery (Non-Deposition)
9/9/2019	Mark Johnson	0.1	\$1,150	\$115	email to GBW / GG re proposed stip concerning inspections for edits/comments before sending to OC	Discovery (Non-Deposition)
9/9/2019	Mark Johnson	0.4	\$1,150	\$460	coms w/ GBW re arbitration issue, class certification and related discovery	Discovery (Non-Deposition)
9/9/2019	Travis Close	0.4	\$850	\$340	Reserch DSS regulations governing required documentation for RCFE facilities	Case Organization, Planning and Strategy
9/9/2019	Travis Close	1.7	\$850	\$1,445	Gather info about ownership/management of former Brookdale facilities for site inspection subpoenas	Case Organization, Planning and Strategy
9/9/2019	Travis Close	0.9	\$850	\$765	Create spreadsheet for tracking misrepresentations and arbitration language in Residency Agreements	Discovery (Non-Deposition)
9/9/2019	Travis Close	1.0	\$850	\$850	Analyze Residency Agreements to misrepresentations in complaint/arbitration provisions, # BKD0000001-BKD0000156 (1-7 of 287)	Discovery (Non-Deposition)
9/9/2019	Travis Close	1.0	\$850	\$850	Analyze Residency Agreements to misrepresentations in complaint/arbitration provisions, # BKD0000156-BKD0026819 (7-19 of 287)	Discovery (Non-Deposition)
9/10/2019	Guy Wallace	0.3	\$1,350	\$405	review and analysis of draft discovery re arbitration issues	Discovery (Non-Deposition)
9/10/2019	Guy Wallace	0.2	\$1,350	\$270	revise and edit draft letter from GG to clients re October mediation with MJ Infante	Settlement
9/10/2019	Guy Wallace	1.3	\$1,350	\$1,755	preparation of outline of mediation brief for October mediation with MJ Infante	Settlement
9/10/2019	Travis Close	0.1	\$850	\$85	Meet w/ GBW re: analysis of residency agreements	Case Organization, Planning and Strategy
9/10/2019	Travis Close	0.4	\$850	\$340	Call with MTJ and GK (co-counsel) re: strategy for file subpoenas to DSS	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/10/2019	Travis Close	1.0	\$850	\$850	Doc Rev -- resident files -- # CTRL0000935-CTRL0000947 (204-216 of 293)	Discovery (Non-Deposition)
9/10/2019	Travis Close	1.0	\$850	\$850	Analyze Residency Agreements to misrepresentations in complaint/arbitration provisions, # BKD0027384-BKD0027869 (31-40 of 287)	Discovery (Non-Deposition)
9/10/2019	Travis Close	1.0	\$850	\$850	Analyze Residency Agreements to misrepresentations in complaint/arbitration provisions, # BKD0027869-BKD0028244 (40-48 of 287)	Discovery (Non-Deposition)
9/10/2019	Travis Close	0.5	\$850	\$425	Analyze Residency Agreements to misrepresentations in complaint/arbitration provisions, # BKD0028652-BKD0028627 (48-54 of 287)	Discovery (Non-Deposition)
9/11/2019	Mark Johnson	0.5	\$1,150	\$575	review and analyze revised version of stip from defendants re class contact information	Discovery (Non-Deposition)
9/11/2019	Mark Johnson	0.2	\$1,150	\$230	coms w/ GBW and GG re form and contetn of stipulation re class contact information.	Discovery (Non-Deposition)
9/11/2019	Mark Johnson	0.2	\$1,150	\$230	coms w/ G Waters re availablityh for inspections and change in schedule; com w/ OC re same.	Discovery (Non-Deposition)
9/11/2019	Mark Johnson	0.4	\$1,150	\$460	mtg w/ TCC re subpoenas to be srevd on 3rd party owners of former brookdae facilities, status of document analysis, project to identify key Brookdaoe personnell, scheduling of site inspections	Discovery (Non-Deposition)
9/11/2019	Mark Johnson	0.7	\$1,150	\$805	revise, format and finalize stipulation re inspections; locate and attache exhibitbs and draft email to OC re same	Discovery (Non-Deposition)
9/11/2019	Mark Johnson	0.3	\$1,150	\$345	mtg w/ AML re status of coding, analysisof reidency agreements and arb clauses, review of docs for identification of key Brookdale personnel	Discovery (Non-Deposition)
9/11/2019	Travis Close	0.2	\$850	\$170	Meet w/ AML re: doc review and 30(b)(6) depo prep projects for staff attorneys	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/11/2019	Travis Close	0.4	\$850	\$340	Meet w/ MTJ re: site inspection subpoenas and RPD strategy	Case Organization, Planning and Strategy
9/11/2019	Travis Close	1.0	\$850	\$850	Doc Rev -- resident files -- # CTRL0000947-CTRL0000950 (216-220 of 293)	Discovery (Non-Deposition)
9/11/2019	Travis Close	1.0	\$850	\$850	Analyze Residency Agreements to misrepresentations in complaint, # BKD0028627-BKD0028872 (54-64 of 287)	Discovery (Non-Deposition)
9/11/2019	Travis Close	1.0	\$850	\$850	Analyze Residency Agreements to misrepresentations in complaint, # BKD0028872-BKD0029122 (64-75 of 287)	Discovery (Non-Deposition)
9/11/2019	Travis Close	0.4	\$850	\$340	Edits to MTJ's draft RFP set 3	Discovery (Non-Deposition)
9/11/2019	Travis Close	1.1	\$850	\$935	Compile/organize owner and manager service of process for site inspection subpoenas	Discovery (Non-Deposition)
9/11/2019	Travis Close	0.6	\$850	\$510	Continue drafting subpoenas to permit site inspections of former Brookdale communities	Discovery (Non-Deposition)
9/12/2019	Travis Close	2.1	\$850	\$1,785	Continue preparing subpoenas to issue for site inspections on former brookdale facilities	Case Organization, Planning and Strategy
9/12/2019	Travis Close	1.5	\$850	\$1,275	Reseaech time to comply with subpoenas & deadline for filing motion to compel responses to subpoena	Case Organization, Planning and Strategy
9/12/2019	Travis Close	1.0	\$850	\$850	Doc Rev -- resident files -- # CTRL0000950-CTRL0000956 (220-225 of 293)	Discovery (Non-Deposition)
9/12/2019	Travis Close	1.0	\$850	\$850	Doc Rev -- resident files -- # CTRL0000956-CTRL0000967 (225-234 of 293)	Discovery (Non-Deposition)
9/13/2019	Mark Johnson	0.3	\$1,150	\$345	call w/ attorney for new owners of vacaville and Bakersfield facilities re site inspections.	Discovery (Non-Deposition)
9/13/2019	Mark Johnson	0.5	\$1,150	\$575	draft email to atty for third party Fields senior living re site inspections for former Bakersfield and Vacaville facilities, subpoenas	Discovery (Non-Deposition)
9/13/2019	Mark Johnson	0.3	\$1,150	\$345	mtg w/ GBW and TCC re site inspection schedule and coverage, additional discovery issues.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/13/2019	Travis Close	1.2	\$850	\$1,020	Research scope of HIPAA as applied to assisted living facilities and Cal DSS	Case Organization, Planning and Strategy
9/13/2019	Travis Close	0.8	\$850	\$680	Research information protection/privacy laws which DSS is subject to	Case Organization, Planning and Strategy
9/13/2019	Travis Close	0.2	\$850	\$170	Meet w/ AML re: research prep for 30(b)(6) depos	Case Organization, Planning and Strategy
9/13/2019	Travis Close	1.0	\$850	\$850	Doc Rev -- resident files -- # CTRL0000967-CTRL0000978 (234-245 of 293)	Discovery (Non-Deposition)
9/13/2019	Travis Close	1.0	\$850	\$850	Analyze Residency Agreements to misrepresentations in complaint, # BKD0029122-BKD0029415 (75-86 of 287)	Discovery (Non-Deposition)
9/13/2019	Travis Close	1.0	\$850	\$850	Analyze Residency Agreements to misrepresentations in complaint, # BKD0029415-BKD0029781 (86-101 of 287)	Discovery (Non-Deposition)
9/13/2019	Travis Close	0.7	\$850	\$595	Analyze sufficiency of Ds productions in response to Ps RFPs number 2	Discovery (Non-Deposition)
9/16/2019	Guy Wallace	0.6	\$1,350	\$810	review and analysis of draft meet and confer letter to D's re non-production of complaints; com's with BBK re same	Discovery (Non-Deposition)
9/16/2019	Mark Johnson	0.6	\$1,150	\$690	review and draft response to AG representing DSS re response to subpoena, meeting and confering, including attachments previously provided to DSS and background explanation.	Discovery (Non-Deposition)
9/16/2019	Mark Johnson	0.8	\$1,150	\$920	review and edit / add to draft of meet and confer letter re complaints; coms w/ GBW and BBK re same	Discovery (Non-Deposition)
9/16/2019	Mark Johnson	3.8	\$1,150	\$4,370	review and analyze outstanding discovery and status of same; update tracking spreadsheet	Discovery (Non-Deposition)
9/16/2019	Travis Close	1.5	\$850	\$1,275	Continue analyzing sufficiency of Ds response to Ps RFPs set 2 (RFPs 9-13)	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/16/2019	Travis Close	1.3	\$850	\$1,105	Doc Rev -- resident files -- # CTRL0000978-CTRL0000988.0004 (245-257 of 293)	Discovery (Non-Deposition)
9/16/2019	Travis Close	0.2	\$850	\$170	Review draft m&c letter by co-counsel re: production of complaints	Discovery (Non-Deposition)
9/16/2019	Travis Close	1.0	\$850	\$850	Analyze Residency Agreements to misrepresentations in complaint, # BKD0029781-BKD0030127 (101-116 of 287)	Discovery (Non-Deposition)
9/16/2019	Travis Close	0.9	\$850	\$765	Continue analyzing sufficiency of Ds response to Ps RFPs set 2 (RFPs 5-9)	Discovery (Non-Deposition)
9/16/2019	Travis Close	1.6	\$850	\$1,360	Continue analyzing sufficiency of Ds response to Ps RFPs set 2 (RFPs 9)	Discovery (Non-Deposition)
9/17/2019	Guy Wallace	1.3	\$1,350	\$1,755	preparation of outline of mediation brief for 10/8 mediation with MJ Infante	Settlement
9/17/2019	Mark Johnson	0.8	\$1,150	\$920	begin drafting new set of interrogatories; research re same	Discovery (Non-Deposition)
9/17/2019	Travis Close	1.8	\$850	\$1,530	Continue analyzing organization charts and doc productions to develop cast of characters	Case Organization, Planning and Strategy
9/17/2019	Travis Close	1.0	\$850	\$850	Continue analyzing sufficiency of Ds response to Ps RFPs set 2 (RFPs 13)	Case Organization, Planning and Strategy
9/17/2019	Travis Close	1.2	\$850	\$1,020	Begin analyzing organization charts and doc productions for cast of characters (depo ideas)	Depositions
9/17/2019	Travis Close	1.0	\$850	\$850	Doc Rev -- resident files -- # CTRL0000988.0004-CTRL0000988.0013 (257-271 of 293)	Discovery (Non-Deposition)
9/17/2019	Travis Close	0.8	\$850	\$680	Continue analyzing organization charts and drafting cast of characters	Discovery (Non-Deposition)
9/18/2019	Guy Wallace	0.4	\$1,350	\$540	tc with GG; MTJ re preparation for 10/8 mediation and meet and confer items re discovery	Discovery (Non-Deposition)
9/18/2019	Mark Johnson	0.2	\$1,150	\$230	review draft of cast of characters document; com w/ TCC re revisions to same	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/18/2019	Mark Johnson	1.0	\$1,150	\$1,150	telephonic meet and confer w/ Buffaloe and Goetz re 6 document requests identified in Ps 9/9/19 letter	Discovery (Non-Deposition)
9/18/2019	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW, GCG re strateg for meet and confer w/ defendants re 6 rfps identified in 9/9 meet and confer letter	Discovery (Non-Deposition)
9/18/2019	Mark Johnson	0.3	\$1,150	\$345	prep for meet and confer w/OC re responses to 6 rfps of first set of document requests, including review of responses and ltr, outline of issues and arguments	Discovery (Non-Deposition)
9/18/2019	Travis Close	1.3	\$850	\$1,105	Continue analyzing sufficiency of Ds response to Ps RFPs set 2	Case Organization, Planning and Strategy
9/18/2019	Travis Close	0.9	\$850	\$765	Call w/ BB, JK and team re: insufficient responses to RFPs	Case Organization, Planning and Strategy
9/18/2019	Travis Close	0.1	\$850	\$85	Meet w/ MTJ re: "cast of characters" assignment	Case Organization, Planning and Strategy
9/18/2019	Travis Close	1.0	\$850	\$850	Doc Rev -- resident files -- # CTRL0000988.0013-CTRL0000997 (271-284 of 293)	Discovery (Non-Deposition)
9/18/2019	Travis Close	2.1	\$850	\$1,785	Draft m&c response following today's call re: RFP responses	Discovery (Non-Deposition)
9/18/2019	Travis Close	1.3	\$850	\$1,105	Meet w/ JMP & draft emails re: two assignments (filing blueprints & developing cast of characters)	Discovery (Non-Deposition)
9/18/2019	Travis Close	0.7	\$850	\$595	Analyze Residency Agreements to misrepresentations in complaint, # BKD0030127-BKD0030369 (116-126 of 287)	Discovery (Non-Deposition)
9/19/2019	Mark Johnson	0.3	\$1,150	\$345	begin drafting ltr template for class members	Class Outreach and Contact
9/19/2019	Mark Johnson	0.8	\$1,150	\$920	meet and confer w/ AG re DSS file subpoena	Discovery (Non-Deposition)
9/19/2019	Mark Johnson	0.1	\$1,150	\$115	draft email to counsel for Fields senior living re site inspection notices, with courtesy copies.	Discovery (Non-Deposition)
9/19/2019	Mark Johnson	0.2	\$1,150	\$230	brief GBW on results of MC with AG for DSS re DSS subpoenas and strategy for receiving files.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/19/2019	Travis Close	1.1	\$850	\$935	Doc Rev -- resident files -- # CTRL0000997-CTRL0001002 (284-293 of 293)	Discovery (Non-Deposition)
9/19/2019	Travis Close	1.5	\$850	\$1,275	Continue analyzing sufficiency of Ds responses to Ps RFPs, set 1 (RFPs 18-20)	Discovery (Non-Deposition)
9/19/2019	Travis Close	0.7	\$850	\$595	Final changes/edits to site inspection subpoenas	Discovery (Non-Deposition)
9/19/2019	Travis Close	0.5	\$850	\$425	last minute edits of final subpoenas for site inspections	Discovery (Non-Deposition)
9/19/2019	Travis Close	0.3	\$850	\$255	Email to Titan legal services re: service of subpoenas	Discovery (Non-Deposition)
9/19/2019	Travis Close	1.2	\$850	\$1,020	Prepare, convert e-files, and organize subpoenas & exhibits for service	Discovery (Non-Deposition)
9/19/2019	Travis Close	0.8	\$850	\$680	Analyze Residency Agreements to misrepresentations in complaint, # BKD0030369-BKD0030589 (126-134 of 287)	Discovery (Non-Deposition)
9/20/2019	Mark Johnson	1.0	\$1,150	\$1,150	complete class outreach lettter template	Discovery (Non-Deposition)
9/20/2019	Mark Johnson	0.3	\$1,150	\$345	coms w/ TCC and with Titan Legal Services re service of multiple site inspection subpoenas for former Brookdale facilities	Discovery (Non-Deposition)
9/20/2019	Travis Close	0.1	\$850	\$85	Meet w/ MTJ re: service of notice of subpoena on Ds	Discovery (Non-Deposition)
9/20/2019	Travis Close	0.2	\$850	\$170	Email to counsel notice of site inspection subpoenas	Discovery (Non-Deposition)
9/20/2019	Travis Close	1.1	\$850	\$935	Analyze Residency Agreements to misrepresentations in complaint, # BKD0030589-BKD0030883 (134-146 of 287)	Discovery (Non-Deposition)
9/20/2019	Travis Close	0.2	\$850	\$170	Call w/ Titan legal services re: service of subpoenas	Discovery (Non-Deposition)
9/20/2019	Travis Close	1.1	\$850	\$935	Analyze Residency Agreements to misrepresentations in complaint, # BKD0030883-BKD0031336 (146-158 of 287)	Discovery (Non-Deposition)
9/20/2019	Travis Close	1.0	\$850	\$850	Analyze Residency Agreements to misrepresentations in complaint, # BKD0031336-BKD0031606 (158-169 of 287)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/20/2019	Travis Close	1.0	\$850	\$850	Analyze Residency Agreements to misrepresentations in complaint, # BKD0031606-BKD0031874 (169-180 of 287)	Discovery (Non-Deposition)
9/20/2019	Travis Close	0.7	\$850	\$595	Research duty to preserve evidence relevant to litigation	Discovery (Non-Deposition)
9/21/2019	Guy Wallace	1.4	\$1,350	\$1,890	preparation of outline of mediation brief	Settlement
9/23/2019	Guy Wallace	0.3	\$1,350	\$405	revise and edit draft letter from MTJ to putative class members; com's with MTJ re approach to outreach	Class Certification
9/23/2019	Mark Johnson	0.7	\$1,150	\$805	review and revise draft template correspondence for class outreach and draft outreach plan; draft email to COC re same and meeting	Class Outreach and Contact
9/23/2019	Mark Johnson	1.0	\$1,150	\$1,150	draft/revise email confirmation of content of meet and confer re six RFPs identified in 9/9/2019 letter and expectations of production and supplemental responses	Discovery (Non-Deposition)
9/23/2019	Mark Johnson	0.4	\$1,150	\$460	meetings w/ TCC (x2) re inspections of former Brookdale facilities in Vacaville and Bakersfield; scheduling same w/ counsel for Fields Senior Living, communication w/ new owner of Riverside facility re inspections.	Discovery (Non-Deposition)
9/23/2019	Travis Close	0.2	\$850	\$170	Review MTJ's draft letter to putative class members	Case Organization, Planning and Strategy
9/23/2019	Travis Close	0.3	\$850	\$255	Review MTJ's class member outreach plan	Case Organization, Planning and Strategy
9/23/2019	Travis Close	0.1	\$850	\$85	Meet w/ MTJ re: obtaining list of contact info from defendants	Case Organization, Planning and Strategy
9/23/2019	Travis Close	0.5	\$850	\$425	Continure researching duty to preserve info in 9th Circuit	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/23/2019	Travis Close	1.1	\$850	\$935	Analyze Residency Agreements to misrepresentations in complaint, # BKD0031874-BKD0032213 (180-191 of 287)	Discovery (Non-Deposition)
9/23/2019	Travis Close	1.1	\$850	\$935	Analyze Residency Agreements to misrepresentations in complaint, # BKD0032213-BKD0032481 (191-202 of 287)	Discovery (Non-Deposition)
9/23/2019	Travis Close	1.0	\$850	\$850	Analyze Residency Agreements to misrepresentations in complaint, # BKD0032481-BKD0032774 (202-215 of 287)	Discovery (Non-Deposition)
9/23/2019	Travis Close	1.3	\$850	\$1,105	Research scope of duty to preserve information in 9th circuit	Discovery (Non-Deposition)
9/23/2019	Travis Close	0.1	\$850	\$85	Call to Tital Legal Services re: progress on service of subpoenas	Discovery (Non-Deposition)
9/24/2019	Mark Johnson	1.7	\$1,150	\$1,955	review and provide edits and comments on answering brief on Carlson/Quinlan appeal on arbitration issue; review D's opening brief and some case law for same	Appeal
9/24/2019	Travis Close	0.7	\$850	\$595	Review JY's draft Answering Brief on Appeal	Appeal
9/24/2019	Travis Close	1.0	\$850	\$850	Analyze Residency Agreements to misrepresentations in complaint, # BKD0032774-BKD0033041 (215-225 of 287)	Case Organization, Planning and Strategy
9/24/2019	Travis Close	0.1	\$850	\$85	call w/ MTJ re: Ds discussion of complaints in prior M&C call	Case Organization, Planning and Strategy
9/24/2019	Travis Close	1.0	\$850	\$850	Analyze Residency Agreements to misrepresentations in complaint, # BKD0033041-BKD0033287 (225-235 of 287)	Discovery (Non-Deposition)
9/24/2019	Travis Close	0.1	\$850	\$85	Review MTJ/BBK's draft response to BB's meet and confer email	Discovery (Non-Deposition)
9/24/2019	Travis Close	1.5	\$850	\$1,275	Research on sanctions for spoiliations of evidence in 9th Circuit	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/25/2019	Mark Johnson	0.3	\$1,150	\$345	draft email to deputy AG re objections to DSS subpoena	Discovery (Non-Deposition)
9/25/2019	Travis Close	0.3	\$850	\$255	Meet w/ MTJ re: inspections going foward week of oct 7-11 and 14-16	Case Organization, Planning and Strategy
9/25/2019	Travis Close	0.1	\$850	\$85	email to expert re: inspections going foward week of oct 7-11 and 14-16	Case Organization, Planning and Strategy
9/25/2019	Travis Close	0.2	\$850	\$170	Review DSS's objections to subpoena	Case Organization, Planning and Strategy
9/25/2019	Travis Close	1.4	\$850	\$1,190	Research, download/organize sources cited by DSS in objections to records subpoena	Case Organization, Planning and Strategy
9/25/2019	Travis Close	0.7	\$850	\$595	Research requirements of nonparties to produce evidence	Case Organization, Planning and Strategy
9/25/2019	Travis Close	1.0	\$850	\$850	Analyze Residency Agreements to misrepresentations in complaint, # BKD0033287-CTRL0000017 (235-245 of 287)	Discovery (Non-Deposition)
9/25/2019	Travis Close	1.0	\$850	\$850	Analyze Residency Agreements to misrepresentations in complaint, # CTRL0000017-CTRL0000557 (245-255 of 287)	Discovery (Non-Deposition)
9/25/2019	Travis Close	1.6	\$850	\$1,360	Draft response to DSS's objections to subpoena to produce documents	Discovery (Non-Deposition)
9/26/2019	Mark Johnson	0.2	\$1,150	\$230	email exchange w/ deputy AG re objections to subpoena, receive, review and analyze same	Discovery (Non-Deposition)
9/26/2019	Mark Johnson	0.4	\$1,150	\$460	review and analyze TCC memo re DSS objections to subpoena and potential responses, supporting materials	Discovery (Non-Deposition)
9/26/2019	Mark Johnson	0.6	\$1,150	\$690	further meet and confer w Deputy AG re production of documents by DSS pursuant to subpoena	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/26/2019	Mark Johnson	0.6	\$1,150	\$690	further review of DSS website search page and manner in which former facilities and newly licensed facilities are treated; review of pre-licensing facility evaluations for Brookdale facilities that have been sold.	Discovery (Non-Deposition)
9/26/2019	Mark Johnson	0.2	\$1,150	\$230	talk to TCC re investigation and tracking to be done re facilities sold by Brookdale.	Discovery (Non-Deposition)
9/26/2019	Mark Johnson	0.2	\$1,150	\$230	review and analyze 2 emails from OC Buffaloe re amended responses to doc requests and document production.	Discovery (Non-Deposition)
9/26/2019	Mark Johnson	1.7	\$1,150	\$1,955	research facilities and sample of evaluation reports and complaint investigation reports on DSS website	Misc. Research
9/26/2019	Travis Close	0.2	\$850	\$170	Meet w/ MTJ re: gathering additional data from DSS website	Case Organization, Planning and Strategy
9/26/2019	Travis Close	0.7	\$850	\$595	Continue researching duties of nonparties to preserve information	Case Organization, Planning and Strategy
9/26/2019	Travis Close	1.7	\$850	\$1,445	Research caselaw re: burden on nonparties to respond to subpoenas	Case Organization, Planning and Strategy
9/26/2019	Travis Close	0.1	\$850	\$85	Meet w/ MTJ re: research on transition dates for former facilities	Case Organization, Planning and Strategy
9/26/2019	Travis Close	0.1	\$850	\$85	Meet w/ ELS Re: transition dates for former communities	Case Organization, Planning and Strategy
9/26/2019	Travis Close	0.2	\$850	\$170	Email to OC re: inspections for week of october 7th	Case Organization, Planning and Strategy
9/26/2019	Travis Close	0.9	\$850	\$765	Analyze/review Ds proposed dates for inspection in October and compare to available dates for our experts	Case Organization, Planning and Strategy
9/26/2019	Travis Close	0.3	\$850	\$255	Review POS for subpoenas to former brookdale facilities	Discovery (Non-Deposition)
9/26/2019	Travis Close	0.6	\$850	\$510	Call w/ DSS re: subpoena for doc production	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/26/2019	Travis Close	1.0	\$850	\$850	Analyze Residency Agreements to misrepresentations in complaint, # CTRL0000557-CTRL0000784 (255-264 of 287)	Discovery (Non-Deposition)
9/26/2019	Travis Close	1.0	\$850	\$850	Analyze Residency Agreements to misrepresentations in complaint, # CTRL0000784-CTRL0000957 (264-274 of 287)	Discovery (Non-Deposition)
9/26/2019	Travis Close	0.1	\$850	\$85	Email to Titan re: directions for reattempting service of process	Discovery (Non-Deposition)
9/27/2019	Guy Wallace	0.9	\$1,350	\$1,215	preparation and drafting of mediation statement	Settlement
9/27/2019	Mark Johnson	0.3	\$1,150	\$345	draft resonse to OC Buffaloe's email re RFPs 2-9, 17-20, 22, 25 and document production generally.	Discovery (Non-Deposition)
9/27/2019	Mark Johnson	4.6	\$1,150	\$5,290	work on meet and confer letter re 2nd set of document requests, research and coms w/ GBW re same	Discovery (Non-Deposition)
9/27/2019	Travis Close	1.2	\$850	\$1,020	Finalize chart of residency agreement analysis	Case Organization, Planning and Strategy
9/27/2019	Travis Close	1.2	\$850	\$1,020	Research court where action is pending's jurisdiction to enforce subpoenas	Case Organization, Planning and Strategy
9/27/2019	Travis Close	1.1	\$850	\$935	Analyze Residency Agreements to misrepresentations in complaint, # CTRL0000957-FOUNTAINGROVE3458 (274-281 of 291)	Discovery (Non-Deposition)
9/27/2019	Travis Close	1.1	\$850	\$935	Analyze Residency Agreements to misrepresentations in complaint, # FOUNTAINGROVE3458-SCOTTSVALLEY0000537 (281-291 of 291)	Discovery (Non-Deposition)
9/29/2019	Guy Wallace	3.3	\$1,350	\$4,455	preparation and drafting of mediation brief	Settlement
9/30/2019	Guy Wallace	3.9	\$1,350	\$5,265	preparation and drafting of mediation brief	Settlement

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/30/2019	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of P's settlement position re IR issues; P's current information and position re class damages	Settlement
9/30/2019	Mark Johnson	0.2	\$1,150	\$230	meet w/ LC re additional input to spreadsheet for sold / inactive facilities	Discovery (Non-Deposition)
9/30/2019	Mark Johnson	0.4	\$1,150	\$460	research re Brookdale Yorba Linda and absence from DSS web site	Discovery (Non-Deposition)
9/30/2019	Mark Johnson	3.0	\$1,150	\$3,450	continue working on meet and confer letter re 2nd set of doc requests	Discovery (Non-Deposition)
9/30/2019	Mark Johnson	0.3	\$1,150	\$345	further discussion w/ EC re locating DSS info on sold Brookdale facilities; walk through online steps for locating same	Misc. Research
9/30/2019	Travis Close	0.5	\$850	\$425	Investigate change of ownership at Brookdale Yorba Linda	Case Management Conferences
9/30/2019	Travis Close	0.9	\$850	\$765	Research SA discovery dispute in Runton v. Brookdale Senior Living, Inc.	Case Organization, Planning and Strategy
9/30/2019	Travis Close	0.8	\$850	\$680	Review allegations of understaffing in complaint compared to SA allegations in Runton	Case Organization, Planning and Strategy
9/30/2019	Travis Close	1.0	\$850	\$850	Doc Rev -- data completion -- # BKD0001537BKD0002192 (1-12 of 206)	Discovery (Non-Deposition)
9/30/2019	Travis Close	1.0	\$850	\$850	Doc Rev -- data completion -- # BKD0002192-BKD0009696 (12-25 of 206)	Discovery (Non-Deposition)
9/30/2019	Travis Close	1.0	\$850	\$850	Doc Rev -- data completion -- # BKD0009696-CTRL0000168 (25-60 of 206)	Discovery (Non-Deposition)
9/30/2019	Travis Close	1.0	\$850	\$850	Doc Rev -- data completion -- # CTRL0000168-CTRL0000436 (60-110 of 206)	Discovery (Non-Deposition)
10/1/2019	Guy Wallace	6.8	\$1,350	\$9,180	preparation and drafting of mediation brief	Settlement
10/1/2019	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re preparation of mediation brief and preparation for mediation with MJ Infante on 10/8	Settlement

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/1/2019	Guy Wallace	1.1	\$1,350	\$1,485	legal research and analysis re applicable access standards re readily achievable barrier removal for Title III entities such as Brookdale	Settlement
10/1/2019	Mark Johnson	0.5	\$1,150	\$575	mtg w/ TCC re discovery and research tasks that need to be completed	Case Organization, Planning and Strategy
10/1/2019	Mark Johnson	2.4	\$1,150	\$2,760	review docket and discovery record and draft section of mediation brief re status of discovery and plans for additional discovery	Settlement
10/1/2019	Travis Close	1.9	\$850	\$1,615	Analyze communications to compile list of facilities inspected; update data in spreadsheet: WebForm_DoPostBackWithOptions(new WebForm_PostBackOptions("ctl00\$PageContent\$SaveAndNewButton\$_Button", "", true, "", "", false, true))t	Case Organization, Planning and Strategy
10/1/2019	Travis Close	1.3	\$850	\$1,105	Meet w/ MTJ re: upcoming assignments for analyzing discovery responses	Case Organization, Planning and Strategy
10/1/2019	Travis Close	1.2	\$850	\$1,020	Doc Rev -- data completion -- # CTRL0000436-CTRL0000461 (110-124 of 206)	Discovery (Non-Deposition)
10/1/2019	Travis Close	0.9	\$850	\$765	Doc Rev -- data completion -- # CTRL0000461-CTRL0000483 (124-135 of 206)	Discovery (Non-Deposition)
10/1/2019	Travis Close	1.1	\$850	\$935	Doc Rev -- data completion -- # CTRL0000483-CTRL0000506 (135-146 of 206)	Discovery (Non-Deposition)
10/1/2019	Travis Close	1.1	\$850	\$935	Analyze Ds responses to RFPs / fill in master spreadsheet	Discovery (Non-Deposition)
10/2/2019	Guy Wallace	3.6	\$1,350	\$4,860	preparation and drafting of mediation brief	Settlement
10/2/2019	Mark Johnson	0.5	\$1,150	\$575	review revisions to draft answering brief and email to COC re same	Appeal

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/2/2019	Mark Johnson	0.5	\$1,150	\$575	mtgs (x2) with TCC and (x2) w/ AML re information gathered and coded blueprints of facilities, project for recording and analyzing same to assess scope of new construction / alteration claim.	Discovery (Non-Deposition)
10/2/2019	Mark Johnson	0.1	\$1,150	\$115	com w/ TCC re D's responses to rogs seeking identification of newly constructed or altered facilities.	Discovery (Non-Deposition)
10/2/2019	Mark Johnson	1.0	\$1,150	\$1,150	review examples of blueprints of facilities produced by defendants	Discovery (Non-Deposition)
10/2/2019	Mark Johnson	0.3	\$1,150	\$345	initial review of draft mediation statement and com w/ GBW re same and formatting / revision tasks	Settlement
10/2/2019	Mark Johnson	1.7	\$1,150	\$1,955	review and edit/comment on final GBW draft of mediation statement	Settlement
10/2/2019	Travis Close	1.0	\$850	\$850	Edits to mediation brief -- insert DSS citations from TAC	Case Organization, Planning and Strategy
10/2/2019	Travis Close	0.3	\$850	\$255	Meet w/ MTJ re: identifying new construction or alteration in blueprints	Case Organization, Planning and Strategy
10/2/2019	Travis Close	0.7	\$850	\$595	Continue analyzing Ds responses to RFPs, set 2 in chart	Case Organization, Planning and Strategy
10/2/2019	Travis Close	1.1	\$850	\$935	Doc Rev -- data completion -- # CTRL0000506-CTRL0000534.0015 (146-156 of 206)	Discovery (Non-Deposition)
10/2/2019	Travis Close	1.1	\$850	\$935	Doc Rev -- data completion -- # CTRL0000534.0015-CTRL0000559 (156-167 of 206)	Discovery (Non-Deposition)
10/2/2019	Travis Close	0.9	\$850	\$765	Continue analyzing Ds responses to RFPs, set 2 in chart	Discovery (Non-Deposition)
10/2/2019	Travis Close	1.3	\$850	\$1,105	Edits/adding citations to Ps mediation brief	Other Motions
10/3/2019	Guy Wallace	0.9	\$1,350	\$1,215	revise and edit mediation brief; com's with GG; JY; MTJ; SC re same	Settlement
10/3/2019	Mark Johnson	0.5	\$1,150	\$575	meet and confer w/ deputy AG Caronly Tsai re DSS production	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/3/2019	Travis Close	0.7	\$850	\$595	Call with deputy AG re: doc production from DSS facilities	Case Organization, Planning and Strategy
10/3/2019	Travis Close	0.2	\$850	\$170	Meet w/ MTJ and GBW re: strategy for doc production from DSS	Case Organization, Planning and Strategy
10/3/2019	Travis Close	1.0	\$850	\$850	Research Brookdale move-in fees for all plaintiffs	Case Organization, Planning and Strategy
10/3/2019	Travis Close	1.8	\$850	\$1,530	Research DSS regulations for requiring fire clearance/construction docs in facility registrations	Case Organization, Planning and Strategy
10/3/2019	Travis Close	1.0	\$850	\$850	Doc Rev -- data completion -- # CTRL0000559-CTRL0000593 (167-180 of 206)	Discovery (Non-Deposition)
10/4/2019	Guy Wallace	0.6	\$1,350	\$810	preparation of mediation brief; com's with Sandra Chan re same	Settlement
10/4/2019	Travis Close	0.2	\$850	\$170	Locate residency agreement template for GBW and MTJ	Case Organization, Planning and Strategy
10/4/2019	Travis Close	1.1	\$850	\$935	Doc Rev -- data completion -- # CTRL0000593-CTRL0000636 (180-192 of 206)	Discovery (Non-Deposition)
10/7/2019	Guy Wallace	0.5	\$1,350	\$675	com's with GG; MTJ re preparation for mediation	Settlement
10/7/2019	Travis Close	0.8	\$850	\$680	Synthesize index notes of new doc production into chart for sharing with team	Case Organization, Planning and Strategy
10/7/2019	Travis Close	0.2	\$850	\$170	Review HCS/LCS's objections to facility inspections	Case Organization, Planning and Strategy
10/7/2019	Travis Close	1.1	\$850	\$935	Further analyze Ds responses to first set of RFPs	Case Organization, Planning and Strategy
10/7/2019	Travis Close	1.7	\$850	\$1,445	Analyze personal service assessment / service alignment docs & call pendant software	Case Organization, Planning and Strategy
10/7/2019	Travis Close	1.4	\$850	\$1,190	Doc Rev -- blueprints, FHA -- # BKD0004435-BKD0004545 (1-8 of 117)	Discovery (Non-Deposition)
10/8/2019	Guy Wallace	7.7	\$1,350	\$10,395	prepare for and attend mediation with MJ Infante	Settlement

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/8/2019	Guy Wallace	0.5	\$1,350	\$675	review and analysis of results of first day of mediation with MJ Infante	Settlement
10/8/2019	Mark Johnson	8.0	\$1,150	\$9,200	mediation w/ Judge Infante, GBW, Gruneld, Wallace, including discussions w/ COC re statregy and case issues during wait times	Settlement
10/8/2019	Mark Johnson	1.2	\$1,150	\$1,380	travel to and from mediation at JAMS	Settlement
10/8/2019	Travis Close	0.9	\$850	\$765	Collect and analyze BKD insurance policies for mediation	Case Organization, Planning and Strategy
10/8/2019	Travis Close	0.7	\$850	\$595	Analyze datapoints in aggregate payroll data produced in labor reports	Case Organization, Planning and Strategy
10/8/2019	Travis Close	1.3	\$850	\$1,105	Analyze sufficiency of responses to RFP 1 (#s 31-34)	Case Organization, Planning and Strategy
10/8/2019	Travis Close	1.0	\$850	\$850	Doc Rev -- facility resident files -- # BKD0002228-BKD0002264 (1-11 of 122)	Discovery (Non-Deposition)
10/8/2019	Travis Close	1.4	\$850	\$1,190	Doc Rev -- facility resident files -- # BKD0002264-BKD0002278 (11-25 of 122)	Discovery (Non-Deposition)
10/8/2019	Travis Close	1.1	\$850	\$935	Doc Rev -- facility resident files -- # BKD0002278-BKD0004142 (25-47 of 122)	Discovery (Non-Deposition)
10/9/2019	Guy Wallace	1.1	\$1,350	\$1,485	analysis of results of 10/8 mediation and D's feedback re P's IR proposals; analysis of information regarding damages; com's with MTJ re same (.4)	Settlement
10/9/2019	Travis Close	0.6	\$850	\$510	Meet w/ MTJ re: litigation strategy before tomorrow's meeting	Case Organization, Planning and Strategy
10/9/2019	Travis Close	0.6	\$850	\$510	Analyze subpoenas sent to former Brookdale facilities and POS received	Case Organization, Planning and Strategy
10/9/2019	Travis Close	1.7	\$850	\$1,445	Analysis of Brookdale facilities inspected, noticed but not inspected, confirmed, etc	Case Organization, Planning and Strategy
10/9/2019	Travis Close	1.5	\$850	\$1,275	Doc Rev -- facility resident files -- # BKD0004142-FOUNTAINGROVE6605 (47-75 of 122)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/10/2019	Guy Wallace	2.9	\$1,350	\$3,915	prepare for and participate in meeting with GG; BBK; JSY; AX; BU; MTJ; TCC re discovery and tasks for preparation for class certification	Discovery (Non-Deposition)
10/10/2019	Travis Close	3.2	\$850	\$2,720	Team meeting re: litigation strategy	Case Organization, Planning and Strategy
10/10/2019	Travis Close	1.0	\$850	\$850	Signup for DSS email updates at individual Brookdale facilities	Case Organization, Planning and Strategy
10/10/2019	Travis Close	1.2	\$850	\$1,020	Doc Rev -- facility resident files -- # FOUNTAINGROVE6605-SANRAMON001124 (75-90 of 122)	Discovery (Non-Deposition)
10/11/2019	Mark Johnson	2.3	\$1,150	\$2,645	mtg of counsel re status of discovery, mediation, inspection status and strategy, planning and assignment of tasks	Case Organization, Planning and Strategy
10/11/2019	Mark Johnson	0.5	\$1,150	\$575	mtg w/ Tyler Smith re class outreach / mail merge letter / use of sharepoint and presentation at mtg.	Case Organization, Planning and Strategy
10/11/2019	Travis Close	0.1	\$850	\$85	Meet w/ MTJ re: scheduled inspection at former Hemet facility	Case Organization, Planning and Strategy
10/11/2019	Travis Close	1.3	\$850	\$1,105	Doc Rev -- facility resident files -- # SANRAMON001124-TRACY0000001 (90-111 of 122)	Case Organization, Planning and Strategy
10/11/2019	Travis Close	1.1	\$850	\$935	Analyze Ds amended responses to RFPs 1 in master discovery chart	Case Organization, Planning and Strategy
10/11/2019	Travis Close	0.5	\$850	\$425	Meet w/ LEC re: project on identifying new construction	Case Organization, Planning and Strategy
10/11/2019	Travis Close	0.2	\$850	\$170	Analyze/send BEST audits to MTJ	Case Organization, Planning and Strategy
10/11/2019	Travis Close	0.4	\$850	\$340	Analyze/send budget docs to MTJ	Case Organization, Planning and Strategy
10/11/2019	Travis Close	1.1	\$850	\$935	Draft email to LEC re: project fo identifying new construction	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/11/2019	Travis Close	1.0	\$850	\$850	Doc Rev # BKD0035268-BKD0035279 (1720-1730 of 6236)	Discovery (Non-Deposition)
10/11/2019	Travis Close	0.7	\$850	\$595	Review examples of resident-specific documents from recent Brookdale production	Discovery (Non-Deposition)
10/12/2019	Mark Johnson	1.0	\$1,150	\$1,150	finish drafting task list / summary of planning meeting	Case Organization, Planning and Strategy
10/14/2019	Mark Johnson	1.0	\$1,150	\$1,150	review and analyze D's response and objections to 3rd set of document requests and 2nd set of interrogatories	Discovery (Non-Deposition)
10/14/2019	Travis Close	0.2	\$850	\$170	Call w/ expert re: access to former facility for inspections	Case Organization, Planning and Strategy
10/14/2019	Travis Close	0.7	\$850	\$595	Doc Rev -- facility resident files -- # -TRACY0000001-TRACY0000122 (111-122 of 122)	Discovery (Non-Deposition)
10/14/2019	Travis Close	1.1	\$850	\$935	Doc Rev # BKD0035279-BKD0035296 (1730-1746 of 6236)	Discovery (Non-Deposition)
10/14/2019	Travis Close	1.0	\$850	\$850	Doc Rev # BKD0035296-BKD0035397 (1746-1849 of 6236)	Discovery (Non-Deposition)
10/14/2019	Travis Close	1.0	\$850	\$850	Doc Rev # BKD0035397-BKD0035473 (1849-1923 of 6236)	Discovery (Non-Deposition)
10/14/2019	Travis Close	1.1	\$850	\$935	Doc Rev # BKD0035473-BKD0035546 (1923-1998 of 6236)	Discovery (Non-Deposition)
10/15/2019	Guy Wallace	1.3	\$1,350	\$1,755	legal research and analysis re arbitration agreements and impact on commonality and class certification decisions	Class Certification
10/15/2019	Travis Close	1.3	\$850	\$1,105	Meet w/ expert JM for debrief/strategy after inspection	Case Organization, Planning and Strategy
10/16/2019	Travis Close	2.5	\$850	\$2,125	Flight from OAK to ONT for Villa de Anza/Hemet facility inspections	Discovery (Non-Deposition)
10/16/2019	Travis Close	0.5	\$850	\$425	Prepare notes for villa de anza inspection	Discovery (Non-Deposition)
10/16/2019	Travis Close	5.5	\$850	\$4,675	Villa de anza inspection -- 9:00-2:30pm	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/17/2019	Mark Johnson	0.2	\$1,150	\$230	review and draft response to email from OC Barker re insepection of hemet faciltiy	Discovery (Non-Deposition)
10/17/2019	Mark Johnson	0.2	\$1,150	\$230	call w/ TCC re history of site inspection subpoena and negotiations re inspection of former Brookdale sites, Blackseth role, associates, etc. for reponse to Barker re rescheduling of Hemet.	Discovery (Non-Deposition)
10/17/2019	Mark Johnson	0.3	\$1,150	\$345	meet and confer w/ cousnel for owners of Fountaingrove facility re objections to site inspection, scope of inspection and scheduling of same	Discovery (Non-Deposition)
10/17/2019	Mark Johnson	0.3	\$1,150	\$345	review HCP/LifeCare Services written objections to site inspections supoenas and take notes of issues to be discussed w/ attorney re same	Discovery (Non-Deposition)
10/17/2019	Mark Johnson	0.3	\$1,150	\$345	work w/ LEC to give guidance on research of facility construction dates	Discovery (Non-Deposition)
10/17/2019	Travis Close	0.9	\$850	\$765	Lyft from hotel (mission inn) to inspection at pacifica senior living hemet	Discovery (Non-Deposition)
10/17/2019	Travis Close	5.5	\$850	\$4,675	Inspection at pacifica senior living hemet -- 9:30- 2:30pm	Discovery (Non-Deposition)
10/17/2019	Travis Close	1.2	\$850	\$1,020	Ride with expert back to ONT airport from pacifica senior living hemet	Discovery (Non-Deposition)
10/17/2019	Travis Close	2.4	\$850	\$2,040	Flight from ONT airport to OAK	Discovery (Non-Deposition)
10/18/2019	Travis Close	1.2	\$850	\$1,020	Doc Rev # BKD0037363-BKD0037364 (1-23 of 200)	Discovery (Non-Deposition)
10/18/2019	Travis Close	1.0	\$850	\$850	Doc Rev # BKD0037364-5262131209083 (23-51 of 200)	Discovery (Non-Deposition)
10/18/2019	Travis Close	1.0	\$850	\$850	Review/analyze licensing file produced by DSS for sample Danville facility	Discovery (Non-Deposition)
10/18/2019	Travis Close	1.1	\$850	\$935	Doc Rev # 5262131209083-BKD0037412 (51-72 of 200)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/21/2019	Travis Close	0.1	\$850	\$85	Email to expert re: inspection dates in Nov	Case Organization, Planning and Strategy
10/21/2019	Travis Close	1.0	\$850	\$850	Doc Rev # BKD0037412-BKD0037430 (1-19 of 130)	Discovery (Non-Deposition)
10/21/2019	Travis Close	0.4	\$850	\$340	Analyze/propose facility inspections and dates to defendants for month of November	Discovery (Non-Deposition)
10/22/2019	Travis Close	1.2	\$850	\$1,020	Review/analyze recent DSS facility evaluation report updates at Brookdale facilities	Case Organization, Planning and Strategy
10/22/2019	Travis Close	1.0	\$850	\$850	Doc Rev # BKD0037430-BKD0037449 (19-39 of 130)	Discovery (Non-Deposition)
10/23/2019	Mark Johnson	0.5	\$1,150	\$575	mtg w/ TCC and AML re status of document review, analysis of production in response to requests at issue for scheduled meet and confer	Discovery (Non-Deposition)
10/23/2019	Mark Johnson	1.8	\$1,150	\$2,070	work on 4th set of document requests	Discovery (Non-Deposition)
10/23/2019	Travis Close	1.0	\$850	\$850	Meet w/ MTJ, AMA re: topics for tomorrow's M&C call with Ds	Case Organization, Planning and Strategy
10/23/2019	Travis Close	1.0	\$850	\$850	Doc Rev # BKD0037449-BKD0037467 (39-58 of 130)	Discovery (Non-Deposition)
10/23/2019	Travis Close	1.1	\$850	\$935	Doc Rev # BKD0037467-BKD0037485 (58-75 of 130)	Discovery (Non-Deposition)
10/23/2019	Travis Close	0.5	\$850	\$425	Analyze Ds responses to 3rd set of RFPs and fill in master chart	Discovery (Non-Deposition)
10/24/2019	Mark Johnson	0.9	\$1,150	\$1,035	meet and confer w/ OC Buffaloe (Ben and Travis on our side) re 2nd set of rogs and 3rd set of doc requests re arbitration; amended responses to 1st set of doc request that were subject of 9/9 ltr; complaints and other issues, including search terms and completion of production	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/24/2019	Mark Johnson	0.2	\$1,150	\$230	mtg w/ TCC following Meet and confer w/ OC re discovery re follow-up issues and tasks	Discovery (Non-Deposition)
10/24/2019	Mark Johnson	1.2	\$1,150	\$1,380	review discovery responses and docs identified as responsive to specific rerequests to prepare for meet and confer call w/ OC re second set of rogs and 1st set of document requests	Discovery (Non-Deposition)
10/24/2019	Travis Close	0.9	\$850	\$765	Analyze budget reports produced to determine for which facilities reports are missing	Case Organization, Planning and Strategy
10/24/2019	Travis Close	1.4	\$850	\$1,190	Update cast of characters by analyzing regional meeting agendas produced	Case Organization, Planning and Strategy
10/24/2019	Travis Close	1.1	\$850	\$935	Continue analyzing Def's documents to develop cast of characters chart	Case Organization, Planning and Strategy
10/24/2019	Travis Close	1.4	\$850	\$1,190	Continue identifying cast of characters from brookdale docs produced & linkedin	Case Organization, Planning and Strategy
10/24/2019	Travis Close	1.2	\$850	\$1,020	Doc Rev # BKD0037485-BKD0037501 (75-92 of 130)	Discovery (Non-Deposition)
10/24/2019	Travis Close	0.9	\$850	\$765	Call with MTJ, BB re: meet and confer on responses 17-22 in RFP 1	Discovery (Non-Deposition)
10/25/2019	Travis Close	1.1	\$850	\$935	Analyze meeting minutes to fill in cast of characters	Case Organization, Planning and Strategy
10/25/2019	Travis Close	1.1	\$850	\$935	Continue analyzing meeting minutes to fill in cast of characters	Case Organization, Planning and Strategy
10/25/2019	Travis Close	1.2	\$850	\$1,020	Continue analyzing meeting minutes to fill in cast of characters	Case Organization, Planning and Strategy
10/25/2019	Travis Close	1.1	\$850	\$935	Doc Rev # BKD0037501-BKD0039785 (92-130 of 130)	Discovery (Non-Deposition)
10/25/2019	Travis Close	1.0	\$850	\$850	Doc Rev # BKD0043187-BKD0043210 (1-13 of 200)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/28/2019	Guy Wallace	0.6	\$1,350	\$810	legal research and analysis re recent CLRA class cert decisions; analysis of schedule for preparation of class cert motion	Class Certification
10/28/2019	Travis Close	0.2	\$850	\$170	Call w/ BBK re: document review process	Case Organization, Planning and Strategy
10/28/2019	Travis Close	1.1	\$850	\$935	continue identifying cast of characters from regional meeting minutes produced	Case Organization, Planning and Strategy
10/28/2019	Travis Close	1.0	\$850	\$850	Doc Rev # BKD0043210-BKD0043256 (13-26 of 200)	Discovery (Non-Deposition)
10/28/2019	Travis Close	1.0	\$850	\$850	Doc Rev # BKD0043256-BKD0043283 (26-40 of 200)	Discovery (Non-Deposition)
10/29/2019	Mark Johnson	0.2	\$1,150	\$230	email coms w/ COC re status of dedicated phone line, web page, need to get emails from participants in outreach efforts	Class Outreach and Contact
10/29/2019	Mark Johnson	1.0	\$1,150	\$1,150	draft email correspondence to Deputy AG re issues related to DSS subpoena and points made in letter proposing form of compliance	Discovery (Non-Deposition)
10/29/2019	Mark Johnson	0.7	\$1,150	\$805	revise and finalize ltr to OC confirming meet and confer session and proposing alternative re arbitration issue; coms w/ COC and GBW re same	Discovery (Non-Deposition)
10/29/2019	Mark Johnson	3.5	\$1,150	\$4,025	work on draft 4th set of document requests, review prior requests and docs produced by Ds for same	Discovery (Non-Deposition)
10/30/2019	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re subpoenas served on DSS and response thereto; class member outreach script	Discovery (Non-Deposition)
10/31/2019	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ; AMA re class outreach; document analysis	Discovery (Non-Deposition)
10/31/2019	Travis Close	1.2	\$850	\$1,020	Doc Rev # BKD0043283-BKD0043301 (40-53 of 200)	Discovery (Non-Deposition)
10/31/2019	Travis Close	0.4	\$850	\$340	Review/log updates to DSS facility evaluation reports at Brookdale facilities	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/1/2019	Mark Johnson	1.0	\$1,150	\$1,150	draft email memo re status of outreach implementation plan, tasks to be performed; review and revise materials re same	Class Outreach and Contact
11/4/2019	Mark Johnson	0.4	\$1,150	\$460	further revisions to draft outreach letter, coms w/ COC re same	Class Outreach and Contact
11/4/2019	Mark Johnson	1.7	\$1,150	\$1,955	further revisions to draft 4th set of document requests; draft emails to COC re same (.1)	Discovery (Non-Deposition)
11/4/2019	Mark Johnson	3.0	\$1,150	\$3,450	review hard copies of policy manuals and conduct relativity document searches of D's production for development of additional RFPs and depo topics for Rule 30b6 depo notice.	Discovery (Non-Deposition)
11/4/2019	Mark Johnson	1.2	\$1,150	\$1,380	work on Rule30(b)(6) depo notice and development of topics for same	Discovery (Non-Deposition)
11/4/2019	Travis Close	1.6	\$850	\$1,360	Continue identifying cast of characters from regional conference call minutes	Case Organization, Planning and Strategy
11/4/2019	Travis Close	0.2	\$850	\$170	Review/analyze MTJ's proposed 4th set of doc request	Case Organization, Planning and Strategy
11/4/2019	Travis Close	1.5	\$850	\$1,275	Continue identifying cast of characters through defendants' recent productions	Case Organization, Planning and Strategy
11/4/2019	Travis Close	0.4	\$850	\$340	Analyze labor/punch report docs received to determine sufficiency for expert analysis	Case Organization, Planning and Strategy
11/4/2019	Travis Close	1.6	\$850	\$1,360	Continue filling in cast of characters with advanced searches and organizational charts	Case Organization, Planning and Strategy
11/4/2019	Travis Close	1.4	\$850	\$1,190	Update master discovery spreadsheet with Ds responses to 3rd set RFPs	Case Organization, Planning and Strategy
11/4/2019	Travis Close	1.2	\$850	\$1,020	Doc Rev # BKD0043301-BKD0043323 (53-65 of 200)	Discovery (Non-Deposition)
11/5/2019	Mark Johnson	0.3	\$1,150	\$345	mtg w/ TCC to discuss document review and document requests	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/5/2019	Mark Johnson	0.7	\$1,150	\$805	further revisions and additions to draft 4th set of document requests	Discovery (Non-Deposition)
11/5/2019	Mark Johnson	4.4	\$1,150	\$5,060	review index of latest production and review and take notes on selected documents	Discovery (Non-Deposition)
11/5/2019	Travis Close	0.5	\$850	\$425	Review/analyze DSS weekly Brookdale facility updates (visit info, facility info_	Case Organization, Planning and Strategy
11/5/2019	Travis Close	1.7	\$850	\$1,445	Review/analyze Ds responses to 2nd set of interrogatories in master spreadsheet	Case Organization, Planning and Strategy
11/5/2019	Travis Close	1.0	\$850	\$850	Doc Rev # BKD0043323-BKD0043352 (65-78 of 200)	Discovery (Non-Deposition)
11/5/2019	Travis Close	0.9	\$850	\$765	Update master discovery spreadsheet with Ps 2nd ROGs	Discovery (Non-Deposition)
11/5/2019	Travis Close	0.4	\$850	\$340	Meet w/ MTJ re: draft 4th set of doc requests	Discovery (Non-Deposition)
11/6/2019	Mark Johnson	0.4	\$1,150	\$460	draft plan for next steps in outreach strategy and mailing stages and send email to COC and outreach team members re same and and re confidentiality acknowledgments.	Class Outreach and Contact
11/6/2019	Mark Johnson	0.9	\$1,150	\$1,035	mtg w/ AML, TCC, Edgar, Justin re feedback from document review; changes to coding panel; strategies and priorities for coding	Discovery (Non-Deposition)
11/6/2019	Mark Johnson	0.8	\$1,150	\$920	conference call w/ Rosen Bien attorneys re document coding priorities and protocol	Discovery (Non-Deposition)
11/6/2019	Mark Johnson	1.5	\$1,150	\$1,725	further revisions to 4th set of document requests, email to COC re same	Discovery (Non-Deposition)
11/6/2019	Mark Johnson	3.0	\$1,150	\$3,450	continue working on draft 30b6 depo notice topics and notice	Discovery (Non-Deposition)
11/6/2019	Mark Johnson	0.1	\$1,150	\$115	email exchange w/ DAG Tsai re DSS production in response to subpoena - setting date for call	Discovery (Non-Deposition)
11/6/2019	Travis Close	0.3	\$850	\$255	Update cast of characters info with additional dates from org charts	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/6/2019	Travis Close	1.1	\$850	\$935	Meet w/ MTJ, AMA, JMP, and EPO re: doc review strategy	Case Organization, Planning and Strategy
11/6/2019	Travis Close	0.6	\$850	\$510	Further updates to facility master spreadsheet with analysis as to recent inspections	Case Organization, Planning and Strategy
11/6/2019	Travis Close	0.8	\$850	\$680	Review/analyze Q3 earnings call	Case Organization, Planning and Strategy
11/6/2019	Travis Close	0.1	\$850	\$85	Review proposed instructions re: contacting class members	Class Outreach and Contact
11/6/2019	Travis Close	0.5	\$850	\$425	Proposed additions to RFP #4	Discovery (Non-Deposition)
11/6/2019	Travis Close	1.3	\$850	\$1,105	Update facility master spreadsheet with recent inspections/notes	Discovery (Non-Deposition)
11/6/2019	Travis Close	1.2	\$850	\$1,020	Analyze blueprints to determine dates for new construction and alteration of Brookdale facilities	Discovery (Non-Deposition)
11/11/2019	Travis Close	0.4	\$850	\$340	Review/analyze motion for prelim approval of class settlement in related case Runton v. Brookdale	Case Organization, Planning and Strategy
11/11/2019	Travis Close	1.1	\$850	\$935	Begin drafting dec of GBW iso Ps MPA iso opp to msj	Motion for Summary Judgment / Adjudicaiton
11/12/2019	Travis Close	1.0	\$850	\$850	Review/analyze recent DSS filings for brookdale facilities and add to tracking chart	Case Organization, Planning and Strategy
11/12/2019	Travis Close	0.9	\$850	\$765	Continue analyzing/recording DSS reports with citations to Brookdale facilities in 2019	Case Organization, Planning and Strategy
11/12/2019	Travis Close	1.1	\$850	\$935	Finish analyzing Ds answers to 2nd set of Rogs and updating master discovery spreadsheet	Discovery (Non-Deposition)
11/12/2019	Travis Close	1.2	\$850	\$1,020	Continue filling in master discovery spreadsheet with Ps RFPs #4	Discovery (Non-Deposition)
11/12/2019	Travis Close	0.1	\$850	\$85	Review email and voicemail from opposing counsel re: discovery dispute (RFP #1)	Discovery (Non-Deposition)
11/12/2019	Travis Close	1.3	\$850	\$1,105	Continue analyzing Ps RFPs 4th set in master discovery spreadsheet	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/13/2019	Travis Close	1.4	\$850	\$1,190	Continue analyzing recent DSS reports/complaints at Brookdale facilities	Case Organization, Planning and Strategy
11/13/2019	Travis Close	1.2	\$850	\$1,020	Identify search terms for requests in RPD 2 and Rogs 2	Case Organization, Planning and Strategy
11/13/2019	Travis Close	1.0	\$850	\$850	Continue analyzing and summarizing Ps RFPs, set 4, in master spreadsheet	Discovery (Non-Deposition)
11/13/2019	Travis Close	0.5	\$850	\$425	Call with MTJ & deputy AG re: DSS facility production	Discovery (Non-Deposition)
11/14/2019	Mark Johnson	0.6	\$1,150	\$690	telephonic meet and confer w/ OC re template residency agreement and arbitration provisions	Discovery (Non-Deposition)
11/14/2019	Travis Close	0.3	\$850	\$255	Prep for call at 12:30 with OC re: residency agreement production	Case Organization, Planning and Strategy
11/14/2019	Travis Close	0.5	\$850	\$425	Call w/ GBW and MTJ re: litigation strategy following discovery call with opposing counsel	Case Organization, Planning and Strategy
11/14/2019	Travis Close	0.7	\$850	\$595	Call with MTJ & opposing counsel re: residency agreemnt production	Discovery (Non-Deposition)
11/15/2019	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ; AMA re discovery and status of D's document production and further MTC re same	Discovery (Non-Deposition)
11/15/2019	Mark Johnson	0.5	\$1,150	\$575	mtg w/ AML re status of document production, most recent productions, additional changes in coding panel to accommodate additional doc types; review examples of docs from coders supporting proposed changes	Discovery (Non-Deposition)
11/18/2019	Mark Johnson	0.4	\$1,150	\$460	mtg w/ TBS re SharePoint usage and entry of data from class member outreach, proposed training for users	Class Outreach and Contact
11/18/2019	Mark Johnson	0.5	\$1,150	\$575	meet w/ AML re latest production and priorities / strategies for coding, analysis of production of template residency agreements and development of indices re same	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/18/2019	Mark Johnson	1.8	\$1,150	\$2,070	review recently produced board minutes for class period	Discovery (Non-Deposition)
11/18/2019	Mark Johnson	0.3	\$1,150	\$345	draft email to COC re BOD minutes produced; draft email to AML re same and management/coding / analysis of docs	Discovery (Non-Deposition)
11/18/2019	Mark Johnson	1.5	\$1,150	\$1,725	relativity research and review and analysis of production of residency agreements	Discovery (Non-Deposition)
11/18/2019	Mark Johnson	0.6	\$1,150	\$690	review ED Call agendas included in recent production	Discovery (Non-Deposition)
11/18/2019	Travis Close	0.1	\$850	\$85	Call with MTJ re: last week's meet and confer call	Case Organization, Planning and Strategy
11/18/2019	Travis Close	0.6	\$850	\$510	Review/revise MTJ's memo re: last week's m&c call with Defendants	Case Organization, Planning and Strategy
11/18/2019	Travis Close	0.3	\$850	\$255	Prepare for first call with Brookdale class member (revise class outreach script	Case Organization, Planning and Strategy
11/18/2019	Travis Close	0.1	\$850	\$85	Review index of latest doc production	Case Organization, Planning and Strategy
11/18/2019	Travis Close	1.0	\$850	\$850	Call Keither Berman // take intake	Class Outreach and Contact
11/18/2019	Travis Close	0.9	\$850	\$765	Summarize intake/story of the Bermans and upload to sharepoint	Class Outreach and Contact
11/19/2019	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ; TCC; AMA re discovery and status of analysis of documents and further tasks re production of documents and MTCs re same	Discovery (Non-Deposition)
11/19/2019	Mark Johnson	0.5	\$1,150	\$575	mtg w/ GBW re agenda for meeting w/ COC, status of document production, class outreach, etc.	Case Organization, Planning and Strategy
11/19/2019	Mark Johnson	0.8	\$1,150	\$920	review in Relativity a sample of ED Call agendas	Discovery (Non-Deposition)
11/19/2019	Mark Johnson	0.5	\$1,150	\$575	review spreadsheet of residency agreements and confer w/ TCC and AML re format and updating of same	Discovery (Non-Deposition)
11/19/2019	Mark Johnson	0.1	\$1,150	\$115	coms w/ counsel for 3rd party and TCC re site inspection on 12/10	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/19/2019	Mark Johnson	0.2	\$1,150	\$230	mtg w/ AML re resources for document review and coding, reassignment of work	Discovery (Non-Deposition)
11/19/2019	Travis Close	0.2	\$850	\$170	Call w/ MTJ Re: residency agreement analysis	Case Organization, Planning and Strategy
11/19/2019	Travis Close	0.1	\$850	\$85	Email to expert (GW) re: confirming inspection with third party counsel	Case Organization, Planning and Strategy
11/19/2019	Travis Close	1.1	\$850	\$935	Continue updating residency analysis chart with recent agreements produced	Case Organization, Planning and Strategy
11/19/2019	Travis Close	0.9	\$850	\$765	Continue updating residency analysis chart with recent agreements produced	Case Organization, Planning and Strategy
11/19/2019	Travis Close	0.6	\$850	\$510	Analyze number of facilities inspected/yet to be inspected and send info to MTJ	Case Organization, Planning and Strategy
11/19/2019	Travis Close	0.9	\$850	\$765	Continue updating complaint chart with recent DSS citations from brookdale facilities	Discovery (Non-Deposition)
11/19/2019	Travis Close	1.2	\$850	\$1,020	Update residency analysis chart with recent agreements produced	Discovery (Non-Deposition)
11/20/2019	Guy Wallace	0.5	\$1,350	\$675	com's with GG; MTJ re discovery and case schedule and need for modification re same	Discovery (Non-Deposition)
11/20/2019	Guy Wallace	0.5	\$1,350	\$675	com's with GG; KAS; MTJ re withdrawal of P's prior monetary demand and further communication to Defendants re same and status of settlement	Settlement
11/20/2019	Mark Johnson	1.3	\$1,150	\$1,495	team meeting re discovery, document coding, document production issues, research and analysis tasks, class cert planning and class outreach	Case Organization, Planning and Strategy
11/20/2019	Mark Johnson	0.4	\$1,150	\$460	prepare for team call by preparing more detailed agenda / task list	Case Organization, Planning and Strategy
11/20/2019	Mark Johnson	0.2	\$1,150	\$230	talk to J Perez re timing of class outreach mailing and staffing required to respond to calls	Class Outreach and Contact
11/20/2019	Mark Johnson	0.5	\$1,150	\$575	meet w/ AML and RAB re strategies for document analysis, and coding and preparation of memos	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/20/2019	Mark Johnson	0.3	\$1,150	\$345	mtg w/ AML and Linda re construction date / certificate of occupancy research	Misc. Research
11/20/2019	Travis Close	0.3	\$850	\$255	Prepare for team call re: litigation strategy	Case Organization, Planning and Strategy
11/20/2019	Travis Close	1.3	\$850	\$1,105	Team call discussing doc production, depositions, class cert, etc.	Case Organization, Planning and Strategy
11/20/2019	Travis Close	0.3	\$850	\$255	Circuate master spreadsheet and relevant declarations to team following call	Case Organization, Planning and Strategy
11/20/2019	Travis Close	1.0	\$850	\$850	Continue analyzing recently received residency agreements for misrepresentation language and arbitration provisions (318-350 of 469)	Discovery (Non-Deposition)
11/20/2019	Travis Close	1.0	\$850	\$850	Continue analyzing recently received residency agreements for misrepresentation language and arbitration provisions (350-383 of 469)	Discovery (Non-Deposition)
11/20/2019	Travis Close	0.8	\$850	\$680	Continue analyzing recently received residency agreements for misrepresentation language and arbitration provisions (383-405 of 469)	Discovery (Non-Deposition)
11/20/2019	Travis Close	0.1	\$850	\$85	Meet w/ MTJ re: doc retention duties for former facilities	Discovery (Non-Deposition)
11/21/2019	Guy Wallace	1.2	\$1,350	\$1,620	review and analysis of draft Rule 30(b)(6) depo notice; revise and edit same	Depositions
11/21/2019	Guy Wallace	0.2	\$1,350	\$270	preparation of email to Barker re settlement and withdrawal of P's prior monetary demand	Settlement
11/21/2019	Mark Johnson	0.1	\$1,150	\$115	review and analyze OC Buffaloe's email summarizing meet and confer re residency agreements and arbitration discovery	Discovery (Non-Deposition)
11/21/2019	Mark Johnson	0.4	\$1,150	\$460	review email and attachments from related case re Brookdale subsidiaries and alter egos	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/21/2019	Travis Close	1.3	\$850	\$1,105	Continue analyzing recently received residency agreements for misrepresentation language and arbitration provisions (415-480 of 480)	Discovery (Non-Deposition)
11/21/2019	Travis Close	1.2	\$850	\$1,020	Continue analyzing recently received residency agreements for misrepresentation language and arbitration provisions (14-53 of 480)	Discovery (Non-Deposition)
11/22/2019	Travis Close	0.3	\$850	\$255	Review MTJ's latest proposed response to Buffaloe, Bill re: arbitration agreements	Case Organization, Planning and Strategy
11/22/2019	Travis Close	1.4	\$850	\$1,190	Finish analyzing/updating residency agreement chart with new RAs from Orangevale	Case Organization, Planning and Strategy
11/25/2019	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re depo planning, task lists	Case Organization, Planning and Strategy
11/25/2019	Mark Johnson	1.2	\$1,150	\$1,380	review and revise task list and assignments; review prior emails, notes of team call for same	Case Organization, Planning and Strategy
11/25/2019	Mark Johnson	0.1	\$1,150	\$115	email to C Tsai re DSS subpoenas and agreement re cut-off date	Discovery (Non-Deposition)
11/25/2019	Mark Johnson	0.4	\$1,150	\$460	mtg w/ RAB re review of spreadsheets produced by Ds and contents of memo analyzing same	Discovery (Non-Deposition)
11/25/2019	Mark Johnson	2.3	\$1,150	\$2,645	review of index of new document production and of documents contained therein	Misc. Research
11/25/2019	Mark Johnson	1.5	\$1,150	\$1,725	search relativity for identification of potential deponents and custodians	Misc. Research
11/25/2019	Travis Close	1.4	\$850	\$1,190	Anaylze arbitration agreements of new residency agreements produced to determine opt-outs	Case Organization, Planning and Strategy
11/25/2019	Travis Close	1.0	\$850	\$850	Search for new residency agreements produced and begin indexing, # BKD0119729-BKD0120501 (1-12 of 33)	Discovery (Non-Deposition)
11/25/2019	Travis Close	1.0	\$850	\$850	Continue indexing new residency agreements produced, # BKD0120501-BKD0125068 (12-33 of 33)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/26/2019	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re discovery and need to modify schedule	Discovery (Non-Deposition)
11/26/2019	Mark Johnson	0.8	\$1,150	\$920	meeting w/ J Perez, CHC, JGK, TBS re class outreach and coordination w/ outreach in other cases, timing, logistics and scope	Class Outreach and Contact
11/26/2019	Travis Close	0.1	\$850	\$85	Review updated task list by MTJ	Case Organization, Planning and Strategy
11/26/2019	Travis Close	0.1	\$850	\$85	Call with MTJ re: missing appendix 20(g)	Case Organization, Planning and Strategy
11/26/2019	Travis Close	1.2	\$850	\$1,020	Analysis of template agreements for MTJ	Discovery (Non-Deposition)
11/27/2019	Travis Close	0.2	\$850	\$170	Call w/ MTJ re: delivery of appendices in CDs to opposing counsel	Case Organization, Planning and Strategy
12/2/2019	Guy Wallace	0.5	\$1,350	\$675	revise and edit draft discovery letter from MTJ to D's re various problems with D's document production; com's with MTJ re same (.2)	Discovery (Non-Deposition)
12/2/2019	Mark Johnson	6.0	\$1,150	\$6,900	continue working on and complete draft of ltr to OC re multiple outstanding discovery issues and need to modify case schedule; review documents and prior communications for same	Discovery (Non-Deposition)
12/2/2019	Travis Close	0.2	\$850	\$170	Meet with MTJ re: strategy for scheduling upcoming depositions	Case Organization, Planning and Strategy
12/3/2019	Guy Wallace	0.2	\$1,350	\$270	com's with AMA re D's document production and analysis of same	Discovery (Non-Deposition)
12/3/2019	Mark Johnson	0.7	\$1,150	\$805	review and incorporate GBW edits into multi-issue discovery ltr; com w/ COC re same; incorporate GCG suggestions, finalize, sign and send ltr	Discovery (Non-Deposition)
12/3/2019	Travis Close	0.7	\$850	\$595	Continue analyzing/reviewing DSS complaints/citations at Brookdale facilities for 2019	Case Organization, Planning and Strategy
12/3/2019	Travis Close	1.3	\$850	\$1,105	Continue analyzing recent DSS facility citations issued to CA brookdale facilities	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/3/2019	Travis Close	0.8	\$850	\$680	Continue analyzing/documenting complaint investigation reports by DSS for Brookdale CA facilities	Case Organization, Planning and Strategy
12/3/2019	Travis Close	1.0	\$850	\$850	Continue analyzing recent DSS facility citations issued to CA brookdale facilities	Case Organization, Planning and Strategy
12/4/2019	Guy Wallace	1.6	\$1,350	\$2,160	preparation of email correspondence to Barker re status of discovery and need to modify case schedule; com's with GG and MTJ re same (.4)	Discovery (Non-Deposition)
12/4/2019	Guy Wallace	0.5	\$1,350	\$675	com's with Marks re potential retention for preparation of expert staffing analysis of Brookdale	Experts (Including Retention)
12/4/2019	Mark Johnson	0.5	\$1,150	\$575	review and edit proposed communication to OC from GBW re case schedule and justifications for modification of same (.4); coms w/ GBW re same (.1)	Case Organization, Planning and Strategy
12/4/2019	Mark Johnson	0.4	\$1,150	\$460	calls w/ GBW re case schedule, proposed communication w/ OC re same, call with D Marks and info re staffing formulas and time / task studies	Case Organization, Planning and Strategy
12/4/2019	Mark Johnson	0.2	\$1,150	\$230	mtg w/ AML re status of Brookdale document review and analysis	Discovery (Non-Deposition)
12/4/2019	Travis Close	1.3	\$850	\$1,105	Continue reviewing/analyzing 2019 DSS facility & complaint incident reports for brookdale facilities (loma linda, magnolia, mirage inn, monrovia, murrieta, napa)	Case Organization, Planning and Strategy
12/4/2019	Travis Close	1.2	\$850	\$1,020	Continue analyzing DSS incident reports for brookdale facilities (north tarzana, northridge, oceanside)	Case Organization, Planning and Strategy
12/4/2019	Travis Close	1.1	\$850	\$935	Continue analyzing DSS incident reports for brookdale facilities (paulin creek, rancho mirage, red bluff)	Case Organization, Planning and Strategy
12/4/2019	Travis Close	1.1	\$850	\$935	Analyze/develop search terms for Ps RPDs 1 and 2	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/4/2019	Travis Close	1.1	\$850	\$935	Continue analyzing Ds responses to Ps RPDs #1	Case Organization, Planning and Strategy
12/5/2019	Guy Wallace	0.3	\$1,350	\$405	revise and edit email to Barker re case schedule; com's with MTJ and GG re same	Case Organization, Planning and Strategy
12/5/2019	Guy Wallace	0.3	\$1,350	\$405	com's with Marks; GG; MTJ re retention and meeting re expert staffing analysis	Discovery (Non-Deposition)
12/5/2019	Mark Johnson	0.2	\$1,150	\$230	draft email to OC re 2 research / investigation projects - ID of deposition candidate EDs and preservation of evidence for divested facilities	Discovery (Non-Deposition)
12/5/2019	Mark Johnson	0.1	\$1,150	\$115	follow up email w/ COC Yellin re facility directors	Discovery (Non-Deposition)
12/5/2019	Mark Johnson	0.2	\$1,150	\$230	review email from OC re multiple discovery issues addressed in 11/22 email and 12/3 ltr and request for extension of time for discovery	Discovery (Non-Deposition)
12/5/2019	Travis Close	1.1	\$850	\$935	Continue analyzing DSS records for recent complaints against Brookdale facilities (Redwood city, riverside, riverwalk, roseville, Salinas)	Case Organization, Planning and Strategy
12/5/2019	Travis Close	1.0	\$850	\$850	Continue analyzing DSS records for recent complaints against Brookdale facilities (san dimas, san jose, san juan capistrano, san pablo, san ramon, santa monica, santa monica gardens)	Case Organization, Planning and Strategy
12/5/2019	Travis Close	1.0	\$850	\$850	Continue analysis of docs produced by Ds in response to RFP #2 & formula search terms	Discovery (Non-Deposition)
12/5/2019	Travis Close	0.7	\$850	\$595	Continue analyzing Ds responses to RFP #2 and suggesting search terms	Discovery (Non-Deposition)
12/6/2019	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW re email from OC discovery issues raised in 11/22 email and 12/3 letter re discovery issues	Discovery (Non-Deposition)
12/6/2019	Mark Johnson	0.2	\$1,150	\$230	draft email response to OC re discovery deficiencies and scheduling meet and confer.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/6/2019	Mark Johnson	0.3	\$1,150	\$345	draft emails to COC summarizing highlights from MCPD minutes and annual reports	Misc. Research
12/6/2019	Travis Close	2.0	\$850	\$1,700	Continue analyzing DSS agency reports at brookdale facilities (scotts valley, south tarzana, sterling court, sunwest, tracy)	Case Organization, Planning and Strategy
12/6/2019	Travis Close	0.2	\$850	\$170	Review WTB's recent correspondance / meet and confer email	Case Organization, Planning and Strategy
12/6/2019	Travis Close	0.3	\$850	\$255	Review memo of fountaingrove shared by co-counsel before next week's inspection	Case Organization, Planning and Strategy
12/6/2019	Travis Close	1.0	\$850	\$850	Continue analyzing DSS agency reports at brookdale facilities (uptown whittier, vacaville, valley view, walnut)	Case Organization, Planning and Strategy
12/6/2019	Travis Close	0.1	\$850	\$85	Meet w/ TBS re: status of call notification system for class outreach	Class Outreach and Contact
12/6/2019	Travis Close	1.2	\$850	\$1,020	Doc Rev # BKD0066646-BKD0066665 (155-167 of 200)	Discovery (Non-Deposition)
12/6/2019	Travis Close	1.2	\$850	\$1,020	Doc Rev # BKD0066665-BKD0066722 (167-200 of 200)	Discovery (Non-Deposition)
12/6/2019	Travis Close	0.2	\$850	\$170	Review email by co-counsel re: strategy for scheduling 30(b)(6) depositions	Discovery (Non-Deposition)
12/6/2019	Travis Close	0.5	\$850	\$425	Continue analyzing DSS agency reports at brookdale facilities (Windsor)	Discovery (Non-Deposition)
12/8/2019	Mark Johnson	0.1	\$1,150	\$115	email exchange w/ COC George Kawamoto re letter from vendor (Titan) re cost splitting agreement	Discovery (Non-Deposition)
12/9/2019	Guy Wallace	0.3	\$1,350	\$405	com's with Grunfeld; Stebner; Umpierre; MTJ re meeting with David Marks re staffing analysis issues	Case Organization, Planning and Strategy
12/9/2019	Mark Johnson	0.2	\$1,150	\$230	review news article re Brookdale San Pablo closing, com w/ TCC re same	Case Organization, Planning and Strategy
12/9/2019	Mark Johnson	0.7	\$1,150	\$805	preliminary review of docs produced by DSS of 7 facilities; confer w/ AML re same	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/9/2019	Mark Johnson	0.2	\$1,150	\$230	coms w/ TCC (2) and GBW re coverage of inspection at Santa Rosa / Arbol / Fountaingrove facility.	Discovery (Non-Deposition)
12/9/2019	Travis Close	0.4	\$850	\$340	Meet with MTJ, GBW re: strategy for tomorrow's inspections at Fountaingrove	Case Organization, Planning and Strategy
12/9/2019	Travis Close	1.1	\$850	\$935	Bart to oakland airport to pick up rental car for tomorrow's inspection	Discovery (Non-Deposition)
12/10/2019	Travis Close	1.6	\$850	\$1,360	Travel from Berkeley to Santa rosa to attend inspection at Fountaingrove facility	Discovery (Non-Deposition)
12/10/2019	Travis Close	2.3	\$850	\$1,955	Travel from Santa Rosa to Oakland airport to return car after inspection at Fountaingrove facility	Discovery (Non-Deposition)
12/10/2019	Travis Close	6.7	\$850	\$5,695	Inspection with GW and counsel for Life Care Services at Arbol Residences of Santa Rosa (formally Brookdale Fountaingrove)	Discovery (Non-Deposition)
12/11/2019	Guy Wallace	1.2	\$1,350	\$1,620	prepare for and participate in tc with Buffaloe and JK re unresolved discovery issues re document production	Discovery (Non-Deposition)
12/11/2019	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ re next steps re discovery disputes re document production, including production of Residency Agreements, e-discovery	Discovery (Non-Deposition)
12/11/2019	Guy Wallace	0.3	\$1,350	\$405	com's with GG re status of discovery; meet and confer with D's re modification to case schedule	Discovery (Non-Deposition)
12/11/2019	Mark Johnson	1.0	\$1,150	\$1,150	meet and confer w/ OC re discovery issues from 12/3 letter and 11/22 email.	Discovery (Non-Deposition)
12/11/2019	Travis Close	0.5	\$850	\$425	Meet w/ MTJ, GBW after meet & confer call re: motions to compel and other litigation strategy	Case Organization, Planning and Strategy
12/11/2019	Travis Close	0.3	\$850	\$255	Review MTJ's email listing recent voicemail messages left by outreach contacts; select call-backs and edit master database	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/11/2019	Travis Close	1.1	\$850	\$935	Call w/ opposing counsel re: latest meet and confer topics on discovery production	Discovery (Non-Deposition)
12/12/2019	Guy Wallace	0.4	\$1,350	\$540	review and analysis of email from Barker re P's proposal re case schedule; com's with GG; MTJ re same	Case Organization, Planning and Strategy
12/12/2019	Mark Johnson	0.7	\$1,150	\$805	mtg w/ AML re status of document coding; strategy for selective coding going forward, analysis of board minutes, results of meet and confer w/ Ds on mtadata.	Discovery (Non-Deposition)
12/12/2019	Travis Close	0.8	\$850	\$680	Research current executive directors for brookdale CA facilities (alhambra - Camarillo)	Case Organization, Planning and Strategy
12/12/2019	Travis Close	1.3	\$850	\$1,105	Call with Robert Trevallee (of Brookdale Orangevale) -- took intake	Case Organization, Planning and Strategy
12/12/2019	Travis Close	0.6	\$850	\$510	Modify/shorten class outreach script	Class Outreach and Contact
12/12/2019	Travis Close	0.2	\$850	\$170	Call to Robert Trevallee (called first number -- wrong number; left voicemail at second)	Class Outreach and Contact
12/13/2019	Travis Close	0.9	\$850	\$765	Research/investigate current executive directors at brookdale facilities (Carlsbad - Fountaingrove)	Case Organization, Planning and Strategy
12/13/2019	Travis Close	0.9	\$850	\$765	Research/investigate current executive directors at brookdale facilities (Fountaingrove-Riverwalk)	Case Organization, Planning and Strategy
12/13/2019	Travis Close	1.3	\$850	\$1,105	Research/investigate current executive directors at brookdale facilities (Riverwalk-Yorba Linda)	Case Organization, Planning and Strategy
12/13/2019	Travis Close	1.1	\$850	\$935	Call back Lori Best -- complete intake	Case Organization, Planning and Strategy
12/13/2019	Travis Close	0.4	\$850	\$340	Review Ps opp to Ds motion to dismiss FAC	Pleadings and Motions Re: Pleadings
12/16/2019	Travis Close	0.4	\$850	\$340	Email to team summarizing Friday's call/intake of class member lori best	Case Organization, Planning and Strategy
12/16/2019	Travis Close	0.6	\$850	\$510	Call w/ class member Carol Howard, took intake	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/16/2019	Travis Close	1.1	\$850	\$935	Review recent DSS citations at Brookdale facilities (Windsor, Yorba Linda, Alhambra-Brea, Citrus Heights, Sunwest, Murrieta, Irvine)	Case Organization, Planning and Strategy
12/16/2019	Travis Close	1.0	\$850	\$850	Continue reviewing & documenting recent DSS facility reports (Irvine, Napa, Chatsworth, Scotts Valley, Carlsbad, San Dimas, Santa Monica, Central Whittier, Santa Monica Gardens, Monrovia, Chatsworth, San Pablo)	Case Organization, Planning and Strategy
12/16/2019	Travis Close	0.2	\$850	\$170	Call w/ class member Harolyn Matisoff	Class Outreach and Contact
12/16/2019	Travis Close	0.3	\$850	\$255	Email to co-counsel re: issue of contact by residents not on class list	Class Outreach and Contact
12/16/2019	Travis Close	0.3	\$850	\$255	Analyze recent messages received from class members and database correspondence	Class Outreach and Contact
12/16/2019	Travis Close	0.6	\$850	\$510	Call with class member Thomas Hackathorn, completed partial intake	Class Outreach and Contact
12/17/2019	Guy Wallace	0.5	\$1,350	\$675	com's with Barker re modification to case schedule	Communications With Opposing Counsel
12/17/2019	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re meet and confer with D's re non-production of Residency Agreements and e-discovery	Discovery (Non-Deposition)
12/17/2019	Guy Wallace	3.7	\$1,350	\$4,995	prepare for and participate in mtg with Marks; GG; AX; BU; MTJ re discovery; further production of documents and e-discovery by Defendants; staffing analysis	Experts (Including Retention)
12/17/2019	Mark Johnson	3.2	\$1,150	\$3,680	mtg w/ GBW, consultant/potential co-counsel re case strategy, scope of discovery related to staffing analysis, use of experts and data needed for same.	Case Organization, Planning and Strategy
12/17/2019	Mark Johnson	0.5	\$1,150	\$575	meet w/ GBW re expert witness strategy, consultation / co counseling with D Marks, costs, case schedule, meet and confer issues on discovery for a.m. call w/ Buffalo, Kopzynski	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/17/2019	Mark Johnson	0.1	\$1,150	\$115	email exchange w/ OC re meet and confer call	Discovery (Non-Deposition)
12/17/2019	Mark Johnson	0.3	\$1,150	\$345	review and analyze research memo from Amy Xu re document retention / preservation in the context of transfer of assets	Discovery (Non-Deposition)
12/17/2019	Mark Johnson	0.1	\$1,150	\$115	com w/ AML re insurance policy production; document coding call	Discovery (Non-Deposition)
12/17/2019	Mark Johnson	0.7	\$1,150	\$805	prep for discovery conference call on ESI progress and residency agreements; review document requests to identify requests to which scanned residency files are responsive	Discovery (Non-Deposition)
12/17/2019	Travis Close	0.9	\$850	\$765	Call Jeff Morlock (class member / father at North Euclid facility) and took intake	Class Outreach and Contact
12/17/2019	Travis Close	0.4	\$850	\$340	Call with class member Leona Halonen (mother at san juan capistrano)	Class Outreach and Contact
12/18/2019	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ re electronic discovery and other discovery disputes; review and analysis of meet and confer correspondence to D's re same	Discovery (Non-Deposition)
12/18/2019	Guy Wallace	0.7	\$1,350	\$945	analysis of retention of Marks and expert team to prepare staffing analysis of Brookdale ALFs; com's with CJH; MTJ re same	Experts (Including Retention)
12/18/2019	Mark Johnson	0.5	\$1,150	\$575	call w/ GBW re status of proposal for extension of class certification deadline; recap fo meet and confer call w/ OC	Case Organization, Planning and Strategy
12/18/2019	Mark Johnson	0.2	\$1,150	\$230	coms w/ AXL (.1) and GBW (.2) re status of class outreach and allocation of work	Class Outreach and Contact
12/18/2019	Mark Johnson	0.4	\$1,150	\$460	further prep for discovery meet and confer re ESI; review draft ESI agreement re metadata for scanned docs	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/18/2019	Mark Johnson	0.5	\$1,150	\$575	meet and confer w/ OC Buffaloe, Kopzcynski re status of ESI production and scope of materials to be gathered for same, residency agreements, metadata for scanned documents from facilities and identification of requests to which recent document production is responsive.	Discovery (Non-Deposition)
12/18/2019	Mark Johnson	0.5	\$1,150	\$575	mtg w/ AXL and TCC re status of document coding, strategy for prioritizing categories of document review and coding	Discovery (Non-Deposition)
12/18/2019	Mark Johnson	1.0	\$1,150	\$1,150	mtg w/ SW document coding team and TCC and AXL re categories of documents seen in recenet document production, review of index sorted by number of occurrences, review project by title and re-prioritization of review process	Discovery (Non-Deposition)
12/18/2019	Mark Johnson	0.2	\$1,150	\$230	folllow up mtg w/ AXL re doc review and coding plan; time spent by coding team by team member and firm,	Discovery (Non-Deposition)
12/18/2019	Travis Close	0.5	\$850	\$425	Meet and confer call with Jeff K, Bill B, and MTJ	Case Organization, Planning and Strategy
12/18/2019	Travis Close	0.8	\$850	\$680	call with robert trevallee (intake, pt 2)	Case Organization, Planning and Strategy
12/18/2019	Travis Close	0.3	\$850	\$255	Meet w/ AMA re: class outreach strategy	Case Organization, Planning and Strategy
12/18/2019	Travis Close	1.4	\$850	\$1,190	meet w/ mtj, ama, and doc review team re: strategy for analyzing productions moving forward	Case Organization, Planning and Strategy
12/18/2019	Travis Close	1.0	\$850	\$850	Modify cast of characters to excel spreadsheet	Case Organization, Planning and Strategy
12/18/2019	Travis Close	0.5	\$850	\$425	Review Sharepoint to assign recent callers; Calls to Shelly Gonzalez and Chris Maurillo (left voicemails)	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/18/2019	Travis Close	0.4	\$850	\$340	Analysis of class outreach efforts according to sharepoint	Class Outreach and Contact
12/18/2019	Travis Close	0.3	\$850	\$255	Develop search terms for RFPs.	Discovery (Non-Deposition)
12/19/2019	Guy Wallace	0.6	\$1,350	\$810	com's with KAS; GG; BU; SC re retention of Marks and expert team re staffing analysis	Discovery (Non-Deposition)
12/19/2019	Guy Wallace	1.5	\$1,350	\$2,025	com's with MTJ; SC re status of discovery and preparation of motions to compel re e-discovery; Residency Agreements; other items for preparation of motion for class certification	Discovery (Non-Deposition)
12/19/2019	Guy Wallace	1.7	\$1,350	\$2,295	preparation and drafting of proposed stipulation and order re modification to case schedule	Other Motions
12/19/2019	Mark Johnson	0.4	\$1,150	\$460	email exchanges (x2) w/ outreach team re changes in outreach process, questions, emails w/ LEC re status of call retrieval and sharepoint file	Class Outreach and Contact
12/19/2019	Mark Johnson	0.3	\$1,150	\$345	preliminary review of responses and objections to 4th set of document requests.	Discovery (Non-Deposition)
12/19/2019	Mark Johnson	0.5	\$1,150	\$575	revise and finalize follow-up letter to meet and confer session w/ OC; confer w/ GBW re same	Discovery (Non-Deposition)
12/19/2019	Travis Close	0.2	\$850	\$170	Review/edit MTJ's draft email summarizing yesterday's M&C call	Case Organization, Planning and Strategy
12/19/2019	Travis Close	1.0	\$850	\$850	Continue investigating cast of characters & formatting new dates columns	Case Organization, Planning and Strategy
12/19/2019	Travis Close	1.5	\$850	\$1,275	Continue investigating Brookdale management team and adding to cast of characters	Case Organization, Planning and Strategy
12/19/2019	Travis Close	1.3	\$850	\$1,105	Continue investigating Brookdale regional/national team and developing cast of characters	Case Organization, Planning and Strategy
12/20/2019	Mark Johnson	0.3	\$1,150	\$345	review proposed stip for change in schedule and confer /w GBW re same	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/20/2019	Mark Johnson	0.8	\$1,150	\$920	further review of Brookdale's responses and objections to 4th set of document production; com w/ Coc re same	Discovery (Non-Deposition)
12/20/2019	Mark Johnson	0.3	\$1,150	\$345	mtg w/ ELS re research project for coomments from residents/family on social media re Brookdale experiences	Misc. Research
12/31/2019	Mark Johnson	2.0	\$1,150	\$2,300	further review and analysis of responses and objections to 4th set of document requests and revise spreadsheet of objections, alleged duplication	Discovery (Non-Deposition)
12/31/2019	Mark Johnson	0.2	\$1,150	\$230	email to COC re scheduled meet and confer, revised spreadsheet; review email from BU with input for meet and confer.	Discovery (Non-Deposition)
1/2/2020	Guy Wallace	0.5	\$1,350	\$675	com's with putative class member Lindrooth re parents and conditions at Brookdale, potential declaration ISO class certification	Class Certification
1/2/2020	Guy Wallace	0.5	\$1,350	\$675	com's with Barker re proposed stipulation re schedule; analysis of same; com's with GG; KAS; MTJ re same	Communications With Opposing Counsel
1/2/2020	Guy Wallace	0.4	\$1,350	\$540	review and analysis of MTJ letter re discovery disputes; com's with MTJ; SC re preparation for tc with D's re discovery issues	Discovery (Non-Deposition)
1/2/2020	Mark Johnson	0.2	\$1,150	\$230	call w/ Gay G re status of discovery, strategy going forward	Discovery (Non-Deposition)
1/3/2020	Guy Wallace	1.1	\$1,350	\$1,485	tc with GG; KAS re case schedule; potential experts; discovery; and motions to compel	Case Organization, Planning and Strategy
1/3/2020	Guy Wallace	0.9	\$1,350	\$1,215	analysis of case schedule and status of discovery needed for class certification motion	Case Organization, Planning and Strategy
1/3/2020	Guy Wallace	1.9	\$1,350	\$2,565	prepare for and participate in tc with Buffaloe; MTJ re discovery issues; case schedule	Communications With Opposing Counsel

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/3/2020	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ re discovery disputes and case schedule	Discovery (Non-Deposition)
1/3/2020	Mark Johnson	0.5	\$1,150	\$575	prep for meet and confer re rekponses to 4th set of document requests	Discovery (Non-Deposition)
1/3/2020	Mark Johnson	1.5	\$1,150	\$1,725	telephonic meet and confer /w OC Buffaloe & Higgins re holdover issues from last session and responses to 4th set of document requests.	Discovery (Non-Deposition)
1/3/2020	Mark Johnson	0.5	\$1,150	\$575	follow up meeting w/ GBW re meet and confer siession, strategy on motion to compel, time needed to complete discovery, proposed stipulation or motion to extend deadlines.	Discovery (Non-Deposition)
1/3/2020	Mark Johnson	0.5	\$1,150	\$575	coms w/ Stebner, AML re insurance policies	Settlement
1/4/2020	Mark Johnson	0.7	\$1,150	\$805	review class outreach sharePoint spreadsheet and compile stats re call-backs; draft email re same to GBW	Class Outreach and Contact
1/6/2020	Guy Wallace	1.4	\$1,350	\$1,890	analysis of tasks necessary to preparation of class certification motion	Class Certification
1/6/2020	Guy Wallace	0.5	\$1,350	\$675	com's with Barker re class cert schedule and analysis of same	Communications With Opposing Counsel
1/7/2020	Guy Wallace	1.5	\$1,350	\$2,025	review and analysis of D's proposed changes to stipulation and order re schedule; revise and edit same; com's with co-counsel re same (.3)	Other Motions
1/7/2020	Travis Close	0.3	\$850	\$255	Meet w/ AMA re: class outreach call with co-counsel	Class Outreach and Contact
1/7/2020	Travis Close	0.2	\$850	\$170	Meet w/ TBS re: outreach call with co-counsel this afternoon	Class Outreach and Contact
1/7/2020	Travis Close	0.2	\$850	\$170	Prepare for meeting w/ co-counsel re: outreach issues	Class Outreach and Contact
1/7/2020	Travis Close	0.9	\$850	\$765	Meeting w/ AMA, TBS, MTJ, LEC, and co-counsel re: class outreach and doc review issues	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/8/2020	Guy Wallace	0.9	\$1,350	\$1,215	revise and edit stipulation and proposed order re schedule; com's with Barker; GG; KAS; MTJ re same	Other Motions
1/9/2020	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ; GG; BU re meet and confer and unresolved discovery issues	Discovery (Non-Deposition)
1/9/2020	Mark Johnson	1.0	\$1,150	\$1,150	call w/ OC wm Buffaloe re outstanding discovery issues, responses to 4th set of document requests	Discovery (Non-Deposition)
1/9/2020	Mark Johnson	0.7	\$1,150	\$805	prep for meet and confer w/ OC Buffaloe re 4th set of document requests and mother discovery issues, including review of notes, spreadsheet of responses and objections, review of arguments re relevance	Discovery (Non-Deposition)
1/9/2020	Mark Johnson	0.4	\$1,150	\$460	mtgs x2 w/ TCC re redacted board meeting minutes, background on recent meet and confer, prep for today's meet and confer on outstanding issues and 4th set of document production	Discovery (Non-Deposition)
1/9/2020	Mark Johnson	0.2	\$1,150	\$230	com w/ AML re document coding assignments	Discovery (Non-Deposition)
1/9/2020	Mark Johnson	0.8	\$1,150	\$920	post m&c communications w/ GG (.2), TCC (.3), and SCC (.3) a re next steps	Discovery (Non-Deposition)
1/9/2020	Travis Close	0.4	\$850	\$340	Meet w/ MTJ re: preparing for today's meet and confer call	Case Organization, Planning and Strategy
1/9/2020	Travis Close	0.3	\$850	\$255	Email to experts re: Ds proposed inspection dates for Februar	Case Organization, Planning and Strategy
1/9/2020	Travis Close	0.6	\$850	\$510	Review co-counsel's analysis of Ds responses to latest RFPs in prep for m&c call	Case Organization, Planning and Strategy
1/9/2020	Travis Close	1.1	\$850	\$935	meet & confer call w/ MTJ, BB, SH, SC, and GG	Case Organization, Planning and Strategy
1/9/2020	Travis Close	0.5	\$850	\$425	Meet w/ MTJ, GG following m&c call re: next steps for motions to compel and other lit. strategy	Case Organization, Planning and Strategy
1/9/2020	Travis Close	0.2	\$850	\$170	Review communication from class member contact & add to sharepoint	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/9/2020	Travis Close	0.3	\$850	\$255	Review stipulation re: accessibility inspections to determine viability of amended notice	Discovery (Non-Deposition)
1/9/2020	Travis Close	1.3	\$850	\$1,105	Doc Rev # BKD0115818- (187-200 of 200)	Discovery (Non-Deposition)
1/9/2020	Travis Close	0.7	\$850	\$595	Review BOD minute redactions in prep for m&c call	Discovery (Non-Deposition)
1/9/2020	Travis Close	1.7	\$850	\$1,445	Search records for all personnel reports received from DSS	Discovery (Non-Deposition)
1/10/2020	Travis Close	0.5	\$850	\$425	Email to bill buffaloe re: personnel reports	Discovery (Non-Deposition)
1/12/2020	Guy Wallace	1.6	\$1,350	\$2,160	preparation of topics and questions for expert depo prep; review and analysis of Schroyer declaration	Depositions
1/13/2020	Guy Wallace	0.7	\$1,350	\$945	tc with GG; KAS re expert retention; potential MTC's; D's financial resources	Case Organization, Planning and Strategy
1/13/2020	Guy Wallace	2.4	\$1,350	\$3,240	prepare for and meet with Juliet Lindrooth re potential declaration in support of class certification	Class Certification
1/13/2020	Mark Johnson	0.1	\$1,150	\$115	check in w/ /GBW re status of discovery and potential motions to compel	Case Organization, Planning and Strategy
1/13/2020	Travis Close	1.0	\$850	\$850	draft amended notice of inspection based on experts' availability in feb-march	Case Organization, Planning and Strategy
1/13/2020	Travis Close	0.8	\$850	\$680	Locate ESI joint letters and orders for SSC	Discovery (Non-Deposition)
1/14/2020	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of discovery issues for which a motion to compel will be necessary and revise and edit GG list of impasse issues	Other Motions
1/15/2020	Guy Wallace	0.7	\$1,350	\$945	analysis of status of discovery and motion to compel issues; expert retention; com's with GG; MTJ re same	Discovery (Non-Deposition)
1/15/2020	Travis Close	1.1	\$850	\$935	Analyze/modify discovery tracking sheet to include Ds responses to 4th set of RFPs	Discovery (Non-Deposition)
1/15/2020	Travis Close	0.6	\$850	\$510	Continue analyzing/modify discovery tracking sheet to include Ds responses to 4th set of RFPs	Discovery (Non-Deposition)
1/15/2020	Travis Close	1.1	\$850	\$935	Continue analyzing Ds responses to RFP # 4 in master discovery chart	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/16/2020	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ; BU re meet and confer re evaluation data and staffing date; preparation of MTC re same	Discovery (Non-Deposition)
1/16/2020	Mark Johnson	1.1	\$1,150	\$1,265	review doc produced by CDSS, list facilities covered, email communications w/ AML re productions, scope of coverage, further review and analysis to be conducted	Discovery (Non-Deposition)
1/16/2020	Mark Johnson	0.1	\$1,150	\$115	email to CDSS / AG counsel Tsai re production.	Discovery (Non-Deposition)
1/16/2020	Travis Close	0.9	\$850	\$765	Continue analyzing Ds responses to RFP 4 and inputting in master spreadsheet (#33-41)	Case Organization, Planning and Strategy
1/16/2020	Travis Close	1.3	\$850	\$1,105	Continue analyzing Ds responses to RFP 4 and inputting in master spreadsheet (#11-19)	Discovery (Non-Deposition)
1/16/2020	Travis Close	1.1	\$850	\$935	Continue analyzing Ds responses to RFP 4 and inputting in master spreadsheet (#19-32)	Discovery (Non-Deposition)
1/16/2020	Travis Close	0.6	\$850	\$510	finalize amended notice of site inspections	Discovery (Non-Deposition)
1/17/2020	Travis Close	0.2	\$850	\$170	Meet w/ LEC re: finalizing amended notice of inspections	Case Organization, Planning and Strategy
1/17/2020	Travis Close	1.1	\$850	\$935	continue analyzing Ds reponses to Ps RFPs, set 4, (# 41-49)	Case Organization, Planning and Strategy
1/17/2020	Travis Close	0.8	\$850	\$680	continue analyzing Ds reponses to Ps RFPs, set 4, (# 50-59)	Case Organization, Planning and Strategy
1/17/2020	Travis Close	0.4	\$850	\$340	Email to team re: issue/quality of outreach letter	Class Outreach and Contact
1/20/2020	Guy Wallace	0.6	\$1,350	\$810	com's with GG; KAS re financial condition of Brookdale and information from Regan re same; potential experts re staffing issues; motions to compel; case schedule	Case Organization, Planning and Strategy
1/20/2020	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ; SC re final meet and confer efforts re discovery issues involving impasse	Discovery (Non-Deposition)
1/21/2020	Guy Wallace	1.5	\$1,350	\$2,025	analysis of potential use of sampled discovery re 67 facilities currently operated by Brookdale in CA; com's with Schwarz and MTJ re same (.8)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/21/2020	Guy Wallace	0.8	\$1,350	\$1,080	tc with Marks; GG; KAS re staffing analysis and potential expert work re same	Experts (Including Retention)
1/21/2020	Guy Wallace	0.3	\$1,350	\$405	com's with AMA; TC re additional 10k's for analysis of D's financial resources	Experts (Including Retention)
1/21/2020	Mark Johnson	0.6	\$1,150	\$690	call w/ GBW re strategy for motion to compel and meet and confer re # custodians and # facilities for ESI searches.	Discovery (Non-Deposition)
1/22/2020	Guy Wallace	1.3	\$1,350	\$1,755	review and analysis of discovery needs re class certification and preparation of potential ESI search terms	Discovery (Non-Deposition)
1/22/2020	Travis Close	0.2	\$850	\$170	Email to JM re: notice of inspections	Case Organization, Planning and Strategy
1/22/2020	Travis Close	0.3	\$850	\$255	Call from debra cossey re: mother' eviction	Class Outreach and Contact
1/22/2020	Travis Close	0.5	\$850	\$425	Review/analyze search terms and correspondance from prior case for GBW	Discovery (Non-Deposition)
1/23/2020	Mark Johnson	0.3	\$1,150	\$345	review and analysis of memo from staff attorney re Resident Logs and Alert Resident Logs	Discovery (Non-Deposition)
1/23/2020	Travis Close	0.4	\$850	\$340	Review recent entries/assignments in class outreach database	Class Outreach and Contact
1/23/2020	Travis Close	0.6	\$850	\$510	Analyze new data received in Sharpointl; Call to Eleanor Wise (left voicemail); Susan Duprat (left voicemail)	Class Outreach and Contact
1/24/2020	Guy Wallace	0.5	\$1,350	\$675	preparation of list of search terms and com's with co-counsel re same	Discovery (Non-Deposition)
1/24/2020	Guy Wallace	0.6	\$1,350	\$810	tc with Marks; BU; SC; MTJ; TCC; AMA re ESI discovery, search terms and custodians	Discovery (Non-Deposition)
1/24/2020	Mark Johnson	0.5	\$1,150	\$575	conference call with COC GBW, Colby, Marks, Umpierre re search terms and custodians and strategy for moving ESI forward.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/24/2020	Mark Johnson	0.1	\$1,150	\$115	follow up call w/ GBW re search terms, discovery motions.	Discovery (Non-Deposition)
1/24/2020	Travis Close	0.5	\$850	\$425	Meet w/ AMA re: ESI search terms following team call	Case Organization, Planning and Strategy
1/24/2020	Travis Close	1.1	\$850	\$935	Cal with class member Susan Duprat	Class Outreach and Contact
1/24/2020	Travis Close	0.9	\$850	\$765	Call w/ GBW, MTJ and co-counsel re: ESI search terms	Discovery (Non-Deposition)
1/26/2020	Mark Johnson	1.7	\$1,150	\$1,955	review documents in relativity and past notes from prior reviews; prepare list of terms and acronyms for ESI search term list, email to COC re same	Discovery (Non-Deposition)
1/27/2020	Guy Wallace	0.5	\$1,350	\$675	com's with TCC; RS re preparation of class member declarations re class cert	Class Certification
1/27/2020	Guy Wallace	0.9	\$1,350	\$1,215	com's with AMA and RES re physical access discovery, including construction history and readily achievable barrier removal; legal research and analysis re case law re readily achievable barrier removal	Discovery (Non-Deposition)
1/27/2020	Mark Johnson	0.6	\$1,150	\$690	review draft ltr from SC on discovery issues demanding final meet and confer based on impasse, draft email commenting on same	Discovery (Non-Deposition)
1/27/2020	Travis Close	0.5	\$850	\$425	Meet w/ GBW re: additional tasks for new attorney	Case Organization, Planning and Strategy
1/27/2020	Travis Close	0.3	\$850	\$255	Gather / email materials for class oureach to RS	Case Organization, Planning and Strategy
1/27/2020	Travis Close	0.3	\$850	\$255	Email to opposing counsel re: notice of inspections	Case Organization, Planning and Strategy
1/27/2020	Travis Close	1.6	\$850	\$1,360	Continue analyzing Ds responses to RFP, set 4	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/28/2020	Guy Wallace	0.5	\$1,350	\$675	review and analysis of draft letter from SC re ESI discovery; com's with SC re same; analysis of results of meet and confer with D's re complaints issue and production of Residency Agreements	Discovery (Non-Deposition)
1/28/2020	Rachel Steyer	0.2	\$750	\$150	discussion with Travis about organization of files, class outreach	Case / Document Administration
1/28/2020	Travis Close	0.5	\$850	\$425	Meet and confer w/ Ds re: issue of facility complaints	Case Organization, Planning and Strategy
1/28/2020	Travis Close	0.3	\$850	\$255	Email to team re: residency agreements info from Defendantas	Case Organization, Planning and Strategy
1/28/2020	Travis Close	0.4	\$850	\$340	Meet w/ LZC and RS re: building department certificate of occupancy search	Case Organization, Planning and Strategy
1/28/2020	Travis Close	1.0	\$850	\$850	Review/analyze updated reports by DSS of CA Brookdale facilities (Chatsworth-Grand terrace)	Case Organization, Planning and Strategy
1/28/2020	Travis Close	1.0	\$850	\$850	Review/analyze updated reports by DSS of CA Brookdale facilities (Grand terrace-Lodi)	Case Organization, Planning and Strategy
1/29/2020	Mark Johnson	1.0	\$1,150	\$1,150	work on final meet and confer letter re ESI, search terms, residency agreements, etc.	Discovery (Non-Deposition)
1/29/2020	Travis Close	0.4	\$850	\$340	Email to SSC re: regional and corporate custodians	Case Organization, Planning and Strategy
1/29/2020	Travis Close	0.9	\$850	\$765	Review/analyze updated reports by DSS of CA Brookdale facilities (Lod-North Euclid)	Case Organization, Planning and Strategy
1/29/2020	Travis Close	1.0	\$850	\$850	Review/analyze updated reports by DSS of CA Brookdale facilities (North Euclid-Riverwalk)	Case Organization, Planning and Strategy
1/29/2020	Travis Close	1.1	\$850	\$935	Review/analyze updated reports by DSS of CA Brookdale facilities (Scotts Valley-Yorba Linda)	Case Organization, Planning and Strategy
1/29/2020	Travis Close	0.5	\$850	\$425	Review org charts to determine custodians for SSC	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/29/2020	Travis Close	0.6	\$850	\$510	meet w/ GBW and MTJ re: moving to compel on residency agreements	Case Organization, Planning and Strategy
1/29/2020	Travis Close	0.9	\$850	\$765	Review/analyze updated reports by DSS of CA Brookdale facilities (Riverwalk-Scotts Valley)	Discovery (Non-Deposition)
1/30/2020	Mark Johnson	0.5	\$1,150	\$575	mtg w/ TCC re inspections, residency agreements, status of meet and confer on complaints, search terms, financial status research, other research and outreach	Case Organization, Planning and Strategy
1/30/2020	Travis Close	0.4	\$850	\$340	Meet w/ MTJ re: priority tasks for next week	Case Organization, Planning and Strategy
1/30/2020	Travis Close	1.2	\$850	\$1,020	updated Residency agreement search -- # BKD0125828-BKD0138450 (12-25 of 515)	Discovery (Non-Deposition)
1/30/2020	Travis Close	0.4	\$850	\$340	updated Residency agreement search -- # BKD0138450-BKD0139568 (25-36 of 515)	Discovery (Non-Deposition)
1/31/2020	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of draft letters to Defendants re discovery issues at impasse; revise and edit same; com's with MTJ re same (.3)	Discovery (Non-Deposition)
1/31/2020	Mark Johnson	0.4	\$1,150	\$460	calls w/ GBW re discovery demand letters, search terms and schedule, contacting court re stipulation	Case Organization, Planning and Strategy
1/31/2020	Mark Johnson	0.5	\$1,150	\$575	mtg w/ Justin P and AML re doc review and analysis of DSS documents and ED call agendas, further work to be done.	Discovery (Non-Deposition)
1/31/2020	Mark Johnson	5.2	\$1,150	\$5,980	draft and finalize M&C ltr to OC re residency agreements; revise and finalize ltr to OC re ESI and other items for final discovery conference	Discovery (Non-Deposition)
1/31/2020	Mark Johnson	0.2	\$1,150	\$230	initial review of proposed search terms from SCC	Discovery (Non-Deposition)
1/31/2020	Rachel Steyer	1.5	\$750	\$1,125	conducted intake call with Harold Staggs, updated information in Sharepoint, created client folder	Class Outreach and Contact
1/31/2020	Rachel Steyer	1.0	\$750	\$750	intake call with Bonnie Holl, had to stop and reschedule to finish up next week, updated Sharepoint info	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/31/2020	Rachel Steyer	0.4	\$750	\$300	performing class outreach, updating sharepoint	Class Outreach and Contact
1/31/2020	Travis Close	1.1	\$850	\$935	updated Residency agreement search -- # BKD0138450-BKD0146450 (25-57 of 515)	Discovery (Non-Deposition)
1/31/2020	Travis Close	0.9	\$850	\$765	updated Residency agreement search -- # BKD0146450-BKD0152656 (57-75 of 515)	Discovery (Non-Deposition)
2/1/2020	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW re case schedule, tasks, search terms, motions to compel	Case Organization, Planning and Strategy
2/2/2020	Guy Wallace	0.9	\$1,350	\$1,215	preparation of searches and analysis of documents that should be done re ADA claims and operational issues; preparation for telephonic hearing with J. Gilliam re schedule on class certification	Discovery (Non-Deposition)
2/2/2020	Mark Johnson	3.4	\$1,150	\$3,910	review, analyze and comment on proposed search terms, draft modifications and email to COC re same	Discovery (Non-Deposition)
2/3/2020	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re preparation of telephonic CMC with J. Gilliam	Case Management Conferences
2/3/2020	Guy Wallace	0.6	\$1,350	\$810	tc with GG; MTJ re preparation for telephonic CMC with J. Gilliam; expert discovery and preparation for class certification	Case Management Conferences
2/3/2020	Mark Johnson	0.4	\$1,150	\$460	mtg w/ GBW re strategy and issues to address with court during conference on 2/4/2020	Case Organization, Planning and Strategy
2/3/2020	Mark Johnson	0.6	\$1,150	\$690	call w/ GBW and GCG re planning for call w/ court, bsais for seeking extension of class cert deadline, discovery needed to file class cert motion, proposed motions to compel.	Case Organization, Planning and Strategy
2/3/2020	Mark Johnson	1.0	\$1,150	\$1,150	conference call w/ Sarah Colby re analysis of search terms and custodians	Discovery (Non-Deposition)
2/3/2020	Mark Johnson	0.5	\$1,150	\$575	prep for call w/ S. Colby re search terms, including review fo select document requests, grid of search terms with comments	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/3/2020	Mark Johnson	3.8	\$1,150	\$4,370	draft final demand letter re failure to produce 3rd party agreements and related documents	Discovery (Non-Deposition)
2/3/2020	Travis Close	0.3	\$850	\$255	Meet with MTJ re: latest discovery letter and future strategy for RFPs	Case Organization, Planning and Strategy
2/3/2020	Travis Close	1.1	\$850	\$935	Doc Rev # BKD0117731-BKD0117744 (19-33 of 200)	Discovery (Non-Deposition)
2/3/2020	Travis Close	0.2	\$850	\$170	Review MTJ's draft meet and confer letter re: management agreements and associated docs requested	Discovery (Non-Deposition)
2/3/2020	Travis Close	1.0	\$850	\$850	updated Residency agreement search -- # BKD0152656-BKD0166556 (75-125 of 515)	Discovery (Non-Deposition)
2/4/2020	Guy Wallace	0.9	\$1,350	\$1,215	com's with GG; MTJ; TCC re results of telephonic CMC with J. Gilliam	Case Management Conferences
2/4/2020	Guy Wallace	0.3	\$1,350	\$405	com's with Barker re results of CMC with J. Gilliam	Case Management Conferences
2/4/2020	Guy Wallace	0.6	\$1,350	\$810	telephonic CMC with J. Gilliam re schedule on class certification	Case Management Conferences
2/4/2020	Guy Wallace	1.4	\$1,350	\$1,890	preparation of notes re CMC with J. Gilliam re schedule on class certification and status of discovery	Case Management Conferences
2/4/2020	Guy Wallace	0.7	\$1,350	\$945	review and analysis of timeline from MTJ re case and discovery; status of meet and confer efforts with Defendants; preparation for telephonic CMC with J. Gilliam re schedule	Case Management Conferences
2/4/2020	Mark Johnson	0.6	\$1,150	\$690	sit in on conference call with court re extension of deadline for class cert, status of discovery	Case Management Conferences
2/4/2020	Mark Johnson	0.4	\$1,150	\$460	follow-up call w/ GBW, GG, TCC re call with court and strategy for setting up discovery conference w/ Judge Beeler; call to OC Barker & left msge re discovery conference	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/4/2020	Mark Johnson	1.7	\$1,150	\$1,955	review discovery and meet and confer history; draft memo to GBW re same for call with court re extension of deadline for class cert motion filing	Case Organization, Planning and Strategy
2/4/2020	Mark Johnson	0.3	\$1,150	\$345	follow-up discussions w/ GBW re results of conference with Court, strategy on seeking discovery conference and pushing motions to compel simultaneously.	Discovery (Non-Deposition)
2/4/2020	Mark Johnson	0.3	\$1,150	\$345	call w/ Brian U re meet and confer letter for documents necessary to staffing analysis; discovery related to same	Discovery (Non-Deposition)
2/4/2020	Rachel Steyer	0.9	\$750	\$675	spoke with Johnathan Gayek concerning the status of the lawsuit, answered various questions, determined that it was best to speak w/sibling to conduct intake	Class Outreach and Contact
2/4/2020	Travis Close	0.5	\$850	\$425	CMC conference w/ judge Gilliam (telephonic)	Case Organization, Planning and Strategy
2/4/2020	Travis Close	0.4	\$850	\$340	Meet w/ GBW, MTJ and GG following CMC to discuss litigation strategy and motions to compel	Case Organization, Planning and Strategy
2/4/2020	Travis Close	0.4	\$850	\$340	Meet w/ MTJ and GBW following CMC to discuss prioritizing issues to present in front of judge beeler	Case Organization, Planning and Strategy
2/4/2020	Travis Close	1.6	\$850	\$1,360	ED research -- research executive directors at facilities where our plaintiffs resided	Case Organization, Planning and Strategy
2/4/2020	Travis Close	0.6	\$850	\$510	Research docs referencing EDs in our e-database production from Defendants and CDSS (Kimia Atacia, Shawn Cull)	Depositions
2/4/2020	Travis Close	1.0	\$850	\$850	updated Residency agreement search -- # BKD016655-BKD0169622 (125-139 of 515)	Discovery (Non-Deposition)
2/4/2020	Travis Close	1.2	\$850	\$1,020	updated Residency agreement search -- # BKD0169622-BKD0170729 (139-161 of 515)	Discovery (Non-Deposition)
2/4/2020	Travis Close	1.1	\$850	\$935	updated Residency agreement search -- # BKD0170729-BKD0172775 (161-198 of 515)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/4/2020	Travis Close	1.2	\$850	\$1,020	updated Residency agreement search -- # BKD0170729- BKD0172775 (198-232 of 515)	Discovery (Non-Deposition)
2/5/2020	Guy Wallace	0.6	\$1,350	\$810	com's with Buffaloe; GG; BU; MTJ re discovery conference with MJ Beeler	Discovery (Non-Deposition)
2/5/2020	Guy Wallace	1.1	\$1,350	\$1,485	com's with AMA; TCC re searches of documents produced by D's to identify any policy or procedure documents re disability access; transportation; emergency evacuation and service alignment (staffing)	Discovery (Non-Deposition)
2/5/2020	Guy Wallace	0.3	\$1,350	\$405	com's with BU re meet and confer letter to Defendants re production of evaluation and staffing data	Discovery (Non-Deposition)
2/5/2020	Guy Wallace	0.4	\$1,350	\$540	com's with Waters re reports re access inspections, documents re Brookdale's facilities available from local building departments	Experts (Including Retention)
2/5/2020	Guy Wallace	2.3	\$1,350	\$3,105	analysis of issues to be included in statement of issues for discovery conference; com's with MTJ re same (.4)	Other Motions
2/5/2020	Mark Johnson	0.2	\$1,150	\$230	review email from OC re timing and process for joint statment re discvoery for MJ Beeler; dicuss w/ GBW re changes to schedule.	Discovery (Non-Deposition)
2/5/2020	Mark Johnson	3.8	\$1,150	\$4,370	draft ltr to OC re documents promised but not produced, need to amend written responses; research for same	Discovery (Non-Deposition)
2/5/2020	Travis Close	0.7	\$850	\$595	review general allegations of service alignment software in Megan Bright v. Brookdale complaint	Case Organization, Planning and Strategy
2/5/2020	Travis Close	0.3	\$850	\$255	Meet w/ AMA re: searches for "accesible" docs on Relativity	Case Organization, Planning and Strategy
2/5/2020	Travis Close	0.2	\$850	\$170	Review/edit draft letter by MTJ re: status of RFPs	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/5/2020	Travis Close	1.1	\$850	\$935	updated Residency agreement search -- # BKD0174407- BKD0182579 (232-247 of 515)	Discovery (Non-Deposition)
2/5/2020	Travis Close	0.3	\$850	\$255	Email to GBW re: performing various doc searches in e- database	Discovery (Non-Deposition)
2/5/2020	Travis Close	0.5	\$850	\$425	updated Residency agreement search -- # BKD0182579- BKD0183444 (247-259 of 515)	Discovery (Non-Deposition)
2/5/2020	Travis Close	0.2	\$850	\$170	Email to GBW re: Ds amended response to ADA policies request	Discovery (Non-Deposition)
2/5/2020	Travis Close	1.3	\$850	\$1,105	Search for policies/procedures re: transportation and emergency evacuation	Discovery (Non-Deposition)
2/5/2020	Travis Close	1.0	\$850	\$850	pdated Residency agreement search -- # BKD0183444- BKD0185493 (259-297 of 515)	Discovery (Non-Deposition)
2/5/2020	Travis Close	1.2	\$850	\$1,020	Updated Residency agreement search -- # BKD0185493-BKD0186942 (297-328 of 515)	Discovery (Non-Deposition)
2/5/2020	Travis Close	0.8	\$850	\$680	Updated Residency agreement search -- # BKD0186942- BKD0189253 (328-376 of 515)	Discovery (Non-Deposition)
2/6/2020	Guy Wallace	0.3	\$1,350	\$405	com's with Buffaloe; GG; KAS; MTJ re discovery conference with MJ Beeler	Discovery (Non-Deposition)
2/6/2020	Guy Wallace	0.9	\$1,350	\$1,215	com's with MTJ; BU re preparation of statement of issues; motions to compel letter briefs	Discovery (Non-Deposition)
2/6/2020	Mark Johnson	0.9	\$1,150	\$1,035	meet and confer w/ Buffaloe, Powers, Luke W re production of complaints (RPD 2-9),	Discovery (Non-Deposition)
2/6/2020	Mark Johnson	0.5	\$1,150	\$575	call w/ GG and Ben BK to prepare for meet and confer w/ OC re production of complaint materials	Discovery (Non-Deposition)
2/6/2020	Mark Johnson	0.3	\$1,150	\$345	review greivance and complaint policies, RPDs 2-9 and spreadsheet summarizing complaints produced by Ds for meet and confer session w/ OC	Discovery (Non-Deposition)
2/6/2020	Rachel Steyer	0.7	\$750	\$525	Finished up intake call with Bonnie Holl, updated sharepoint and client file	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/6/2020	Rachel Steyer	0.9	\$750	\$675	conducted partial intake with Hanford Crews; updated Sharepoint contact info; created client folder	Class Outreach and Contact
2/6/2020	Rachel Steyer	0.2	\$750	\$150	attempted to conduct intake w/Denise Smith & her husband, explained the case but they did not wish to participate	Class Outreach and Contact
2/6/2020	Rachel Steyer	0.6	\$750	\$450	attempted class outreach, leaving VMs, updating sharepoint	Class Outreach and Contact
2/6/2020	Travis Close	1.1	\$850	\$935	m&c call with Defendants re: complaints production	Case Organization, Planning and Strategy
2/6/2020	Travis Close	0.5	\$850	\$425	Email to team re: complaint from plaintiff Bernier Jestrabek-Hart	Case Organization, Planning and Strategy
2/6/2020	Travis Close	1.1	\$850	\$935	updated Residency agreement search -- # BKD0189253-BKD0190118 (376-392 of 515)	Discovery (Non-Deposition)
2/6/2020	Travis Close	1.2	\$850	\$1,020	updated Residency agreement search -- # BKD0190118-BKD0194678 (392-428 of 515)	Discovery (Non-Deposition)
2/6/2020	Travis Close	0.8	\$850	\$680	updated Residency agreement search -- # BKD0194678-BKD0195925 (428-450 of 515)	Discovery (Non-Deposition)
2/6/2020	Travis Close	1.0	\$850	\$850	updated Residency agreement search -- # BKD0195925-BKD0197772 (450-473 of 515)	Discovery (Non-Deposition)
2/6/2020	Travis Close	1.4	\$850	\$1,190	updated Residency agreement search -- # BKD0197772-BKD0250989 (473-502 of 515)	Discovery (Non-Deposition)
2/6/2020	Travis Close	1.2	\$850	\$1,020	updated Residency agreement search -- # BKD0250989-BKD0232653 (1-49 of 104)	Discovery (Non-Deposition)
2/7/2020	Guy Wallace	1.1	\$1,350	\$1,485	com's with MTJ; TCC; AMA re D's production of documents regarding ADA; accessibility; requests for barrier removal; service alignment; task time studies	Discovery (Non-Deposition)
2/7/2020	Guy Wallace	0.9	\$1,350	\$1,215	com's with MTJ; TCC; SC re preparation of Statement of Issues	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/7/2020	Guy Wallace	2.5	\$1,350	\$3,375	preparation and drafting of Statement of Issues; com's with MTJ re same	Discovery (Non-Deposition)
2/7/2020	Mark Johnson	1.5	\$1,150	\$1,725	draft outline for plaintiffs' section of joint discovery statement	Discovery (Non-Deposition)
2/7/2020	Mark Johnson	1.0	\$1,150	\$1,150	meeting w/ GBW, joined by TCC re outline and allocation of work on joint discovery statement and research related to same	Discovery (Non-Deposition)
2/7/2020	Mark Johnson	0.4	\$1,150	\$460	review, edit and comment on draft section of joint letter brief re complaints	Discovery (Non-Deposition)
2/7/2020	Mark Johnson	0.5	\$1,150	\$575	further mtg w/ GBW and TCC re topics and strategy of joint discovery statement	Discovery (Non-Deposition)
2/7/2020	Mark Johnson	4.7	\$1,150	\$5,405	work on sections of joint discovery statement and research for same	Discovery (Non-Deposition)
2/7/2020	Rachel Steyer	1.5	\$750	\$1,125	intake conversation with Barbara Coster, updating Sharepoint info, creating client file	Class Outreach and Contact
2/7/2020	Rachel Steyer	1.1	\$750	\$825	attempted class outreach; leaving VMs, updating Sharepoint	Class Outreach and Contact
2/7/2020	Rachel Steyer	0.2	\$750	\$150	reviewing email/documents from client, passing along information to GBW and MTJ	Class Outreach and Contact
2/7/2020	Travis Close	0.3	\$850	\$255	Review letter from Brian / stebner firm asking for payroll assesment & time studies data	Case Organization, Planning and Strategy
2/7/2020	Travis Close	1.3	\$850	\$1,105	Analyze ADA search results for GBW	Case Organization, Planning and Strategy
2/7/2020	Travis Close	1.0	\$850	\$850	updated Residency agreement search -- # BKD0232653-BKD0233867 (49-64 of 104)	Discovery (Non-Deposition)
2/7/2020	Travis Close	0.9	\$850	\$765	updated Residency agreement search -- # BKD0233867-BKD0235482 (64-86 of 104)	Discovery (Non-Deposition)
2/7/2020	Travis Close	0.6	\$850	\$510	Meet w/ MTJ and GBW re: joint statement of issues	Discovery (Non-Deposition)
2/7/2020	Travis Close	1.0	\$850	\$850	updated Residency agreement search -- # BKD0235482-BKD0242671 (86-104 of 104)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/9/2020	Guy Wallace	7.4	\$1,350	\$9,990	preparation and drafting of Statement of Issues for discovery conference with MJ Beeler	Other Motions
2/9/2020	Mark Johnson	0.5	\$1,150	\$575	calls (x2) with GBW re proposed amended schedule for class cert motion and issues related to joint discovery statement	Discovery (Non-Deposition)
2/9/2020	Mark Johnson	1.5	\$1,150	\$1,725	work on sections of joint discovery statement	Discovery (Non-Deposition)
2/9/2020	Mark Johnson	3.5	\$1,150	\$4,025	review doc in document production from Ds for joint discovery statement and background	Discovery (Non-Deposition)
2/9/2020	Mark Johnson	0.5	\$1,150	\$575	draft email describing and attaching relevant documents from Ds document production	Discovery (Non-Deposition)
2/10/2020	Guy Wallace	3.6	\$1,350	\$4,860	preparation and drafting of statement of issues	Discovery (Non-Deposition)
2/10/2020	Guy Wallace	0.9	\$1,350	\$1,215	tc with Defendants re D's production of Residency Agreements; ESI; deadline for completion of all productions of responsive documents	Discovery (Non-Deposition)
2/10/2020	Guy Wallace	0.8	\$1,350	\$1,080	com's with MTJ; TCC; AMA; Bonner; SC re D's production of budget documents and areas of non-production of responsive documents re budget variances, policies and procedures	Discovery (Non-Deposition)
2/10/2020	Guy Wallace	1.6	\$1,350	\$2,160	revise and edit draft of P's portion of statement of issues; com's with GG re same (.4)	Discovery (Non-Deposition)
2/10/2020	Guy Wallace	1.2	\$1,350	\$1,620	revise and edit statement of issues	Discovery (Non-Deposition)
2/10/2020	Mark Johnson	1.1	\$1,150	\$1,265	meet and confer call w/ OC Buffaloe, Kopczynski and Powers	Discovery (Non-Deposition)
2/10/2020	Rachel Steyer	0.8	\$750	\$600	intake call with Debbie Mahomey; updated sharepoint contact info	Class Outreach and Contact
2/10/2020	Travis Close	1.3	\$850	\$1,105	Continue drafting sections of joint brief re: accessible transportation and emergency evacuation	Case Organization, Planning and Strategy
2/10/2020	Travis Close	0.8	\$850	\$680	Review edits to latest draft of statement of issues	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/10/2020	Travis Close	1.0	\$850	\$850	Meet and confer call w/ Defendants re: jan 31st letters	Case Organization, Planning and Strategy
2/10/2020	Travis Close	0.3	\$850	\$255	Review GG's edits to statement of issues	Case Organization, Planning and Strategy
2/10/2020	Travis Close	1.3	\$850	\$1,105	updated Residency agreement search -- # BKD0242671- BKD0266023 (1-21 of 47)	Discovery (Non-Deposition)
2/10/2020	Travis Close	1.0	\$850	\$850	Further revisions to statement of issues	Discovery (Non-Deposition)
2/10/2020	Travis Close	0.9	\$850	\$765	Meet w/ AMA, RAB, MTJ, and GBW re: defendants' budget production	Discovery (Non-Deposition)
2/10/2020	Travis Close	1.1	\$850	\$935	Email to MTJ and GBW re: analysis of Ds mischaracterizations for inspections and further strategy	Discovery (Non-Deposition)
2/10/2020	Travis Close	0.4	\$850	\$340	Update citations for RFPs in statement of issues	Discovery (Non-Deposition)
2/11/2020	Guy Wallace	3.6	\$1,350	\$4,860	preparation and drafting of P's portion of joint statement of issues; revise and edit same	Discovery (Non-Deposition)
2/11/2020	Mark Johnson	1.7	\$1,150	\$1,955	review and work with data identifying regional and district directors; review org charts to supplement same	Case Organization, Planning and Strategy
2/11/2020	Mark Johnson	0.4	\$1,150	\$460	coms w/ GBW (x2) re joint statement re discovery, retention and meeting w/ statistical expert and scheduling team mtg, creating task list	Case Organization, Planning and Strategy
2/11/2020	Mark Johnson	0.1	\$1,150	\$115	com w/ staff re timing and availability of class outreach staff	Class Outreach and Contact
2/11/2020	Mark Johnson	0.6	\$1,150	\$690	mtg w/ TCC, GBW, RAB, AML re production of budget related documents for joint discovery statement	Discovery (Non-Deposition)
2/11/2020	Mark Johnson	0.7	\$1,150	\$805	draft email response to OC Jeff K rfe site inspection scheduling; review annotated chart of inspection history from TCC and com w/ TCC re same for email.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/11/2020	Mark Johnson	0.1	\$1,150	\$115	emails w/ COC BU and OC re response to M&C ltr re payroll and assessment data.	Discovery (Non-Deposition)
2/11/2020	Mark Johnson	0.7	\$1,150	\$805	final review of joint statment, identify citations to discovery for same	Discovery (Non-Deposition)
2/11/2020	Mark Johnson	0.5	\$1,150	\$575	review docs re service alignment identified by AML	Discovery (Non-Deposition)
2/11/2020	Mark Johnson	0.5	\$1,150	\$575	internet research for Brookdale regional vp's, directors and eds	Misc. Research
2/11/2020	Rachel Steyer	1.6	\$750	\$1,200	intake conversation with Jack Ahrens, update Sharepoint and client file	Class Outreach and Contact
2/11/2020	Travis Close	0.3	\$850	\$255	Review draft of statement of issues before GBW sends to Ds	Case Organization, Planning and Strategy
2/11/2020	Travis Close	1.0	\$850	\$850	Analysis of residency agreements --- continue converting e-data to spreadsheet	Case Organization, Planning and Strategy
2/11/2020	Travis Close	1.4	\$850	\$1,190	Analyze docs identified in search for EDs at plaintiff facilities	Case Organization, Planning and Strategy
2/11/2020	Travis Close	1.0	\$850	\$850	Continue outputting new residency agreement data recieved into spreadsheet for analysis	Case Organization, Planning and Strategy
2/11/2020	Travis Close	1.2	\$850	\$1,020	updated Residency agreement search -- # BKD0266023-BKD0271312 (21-47 of 47)	Discovery (Non-Deposition)
2/11/2020	Travis Close	1.2	\$850	\$1,020	Continue analyzing docs identified in search for EDs at plaintiff facilities	Discovery (Non-Deposition)
2/12/2020	Guy Wallace	0.7	\$1,350	\$945	review and analysis of D's portion of joint letter brief re complaints; com's with GG; BBK; MTJ re same	Other Motions
2/12/2020	Travis Close	1.0	\$850	\$850	Review/analyze documents referencing "residency agreement system" in relativity	Case Organization, Planning and Strategy
2/12/2020	Travis Close	0.9	\$850	\$765	Residency argreement misrepresentation/arbitration analysis -- # BKD0166884-BKD0170729 (142-173 of 669)	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/12/2020	Travis Close	1.0	\$850	\$850	Residency argreement misrepresentation/arbitration analysis -- # BKD0051689-BKD0126715 (1-18 of 669)	Discovery (Non-Deposition)
2/12/2020	Travis Close	1.3	\$850	\$1,105	Residency argreement misrepresentation/arbitration analysis -- # BKD0126715-BKD0142905 (18-55 of 669)	Discovery (Non-Deposition)
2/12/2020	Travis Close	1.0	\$850	\$850	Residency argreement misrepresentation/arbitration analysis -- # BKD0142905-BKD0149506 (55-80 of 669)	Discovery (Non-Deposition)
2/12/2020	Travis Close	1.0	\$850	\$850	Residency argreement misrepresentation/arbitration analysis -- # BKD0149506-BKD0156454 (80-111 of 669)	Discovery (Non-Deposition)
2/12/2020	Travis Close	0.9	\$850	\$765	Residency argreement misrepresentation/arbitration analysis -- # BKD0156454-BKD0166884 (111-142 of 669)	Discovery (Non-Deposition)
2/12/2020	Travis Close	1.0	\$850	\$850	Residency argreement misrepresentation/arbitration analysis -- # BKD0170729-BKD0173088 (173-219 of 669)	Discovery (Non-Deposition)
2/13/2020	Guy Wallace	0.4	\$1,350	\$540	com's with JY; RES re class outreach and preparation of class member declarations; review and analysis of draft of Carlson declaration	Class Certification
2/13/2020	Guy Wallace	0.5	\$1,350	\$675	revise and edit draft notice of deposition re Executive Directors; com's with JY; MTJ re same	Depositions
2/13/2020	Guy Wallace	0.6	\$1,350	\$810	com's with Waters; CC; MTJ re preparation of subpoenas to local building departments re permit records for new construction and alterations at Brookdale facilities	Discovery (Non-Deposition)
2/13/2020	Guy Wallace	0.3	\$1,350	\$405	com's with BU; JY re D's insurance policies and coverage analysis re same	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/13/2020	Guy Wallace	0.5	\$1,350	\$675	review and analysis of draft joint motion to compel re complaints; com's with BBK re same	Other Motions
2/13/2020	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW, JY re depositions of EDs and assignments, class member declarations	Discovery (Non-Deposition)
2/13/2020	Mark Johnson	0.5	\$1,150	\$575	mtg w/ GBW re depo notices and depositions of facility directors, letter to OC re overbreadth of production	Discovery (Non-Deposition)
2/13/2020	Rachel Steyer	0.5	\$750	\$375	started intake call w/Carrie Biggs-Adams; she had to reschedule; set for next week; updated sharepoint	Class Outreach and Contact
2/13/2020	Rachel Steyer	0.9	\$750	\$675	started intake call w/Stella Davis but had to stop to reschedule; updated sharepoint contact info	Class Outreach and Contact
2/13/2020	Rachel Steyer	2.3	\$750	\$1,725	attempting calls; leaving VMs; explaining the basics of the case to representative parties; updating contact info in Sharepoint; scheduling follow up calls	Class Outreach and Contact
2/13/2020	Travis Close	1.1	\$850	\$935	Residency argreement misrepresentation/arbitration analysis -- # BKD0173088-BKD0182867 (241-266 of 669)	Case Organization, Planning and Strategy
2/13/2020	Travis Close	0.6	\$850	\$510	Research new/recent financial filings on SEC website	Case Organization, Planning and Strategy
2/13/2020	Travis Close	1.0	\$850	\$850	Residency argreement misrepresentation/arbitration analysis -- # BKD0173088- (219-241 of 669)	Discovery (Non-Deposition)
2/13/2020	Travis Close	1.2	\$850	\$1,020	Residency argreement misrepresentation/arbitration analysis -- # BKD0182867-BKD0184942 (266-307 of 669)	Discovery (Non-Deposition)
2/13/2020	Travis Close	1.1	\$850	\$935	Residency argreement misrepresentation/arbitration analysis -- # BKD0184942-BKD0187058 (307-350 of 669)	Discovery (Non-Deposition)
2/13/2020	Travis Close	1.0	\$850	\$850	Residency argreement misrepresentation/arbitration analysis -- # BKD0187058-BKD0194127 (350-437 of 669)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/14/2020	Guy Wallace	3.5	\$1,350	\$4,725	review and analysis of D's categories of non-responsive documents produced from local assisted facilities; com's with MTJ and TCC re same	Discovery (Non-Deposition)
2/14/2020	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re Third Amended Complaint; D's Answer and denials re being owner and/or operate of 89 assisted living facilities in CA, and need for discovery re ownership documents re same	Other Motions
2/14/2020	Mark Johnson	0.8	\$1,150	\$920	confer w/ GBW re proof of Brookdale ownership / management of facilities, discovery related to same and review of TAC, Answer re allegations and response related to same	Case Organization, Planning and Strategy
2/14/2020	Mark Johnson	0.2	\$1,150	\$230	email exchange w/ Thomas re outreach project and training / assignment for new outreach employee	Class Outreach and Contact
2/14/2020	Mark Johnson	2.0	\$1,150	\$2,300	meet and review w/ GBW and TCC most frequently produced document for inclusion in list with letter re overbreadth of production.	Discovery (Non-Deposition)
2/14/2020	Mark Johnson	0.5	\$1,150	\$575	mtg w/ Justin P and TCC re document production indices and categories of documents for list of documents to be excluded from future productions.	Discovery (Non-Deposition)
2/14/2020	Mark Johnson	0.3	\$1,150	\$345	mtg w/ TCC re research project related to construction history of facilities	Discovery (Non-Deposition)
2/14/2020	Mark Johnson	4.7	\$1,150	\$5,405	review docs in relativity to identify docs to be excluded from future production for ltr to OC	Discovery (Non-Deposition)
2/14/2020	Travis Close	0.4	\$850	\$340	Meet w/ MTJ re: letter documenting worthless doc types collected by Defendants	Case Organization, Planning and Strategy
2/14/2020	Travis Close	1.0	\$850	\$850	Create new title & occurrence analysis of BKD production to date	Case Organization, Planning and Strategy
2/14/2020	Travis Close	1.4	\$850	\$1,190	Residency argreement misrepresentation/arbitration analysis -- # BKD0194127-BKD0195803 (437-460 of 669)	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/14/2020	Travis Close	0.1	\$850	\$85	Meet w/ EPO re: policy/manual analysis assignment	Case Organization, Planning and Strategy
2/14/2020	Travis Close	0.9	\$850	\$765	Residency argreement misrepresentation/arbitration analysis -- # BKD0195803-BKD0251096 (490-529 of 669)	Case Organization, Planning and Strategy
2/14/2020	Travis Close	1.6	\$850	\$1,360	Meet w/ GBW and MTJ re: analyzing docs on Relativity that are irrelevant (for letter to Ds)	Case Organization, Planning and Strategy
2/14/2020	Travis Close	0.7	\$850	\$595	Meet w/ MTJ re: subpoena assignment for city building departments	Case Organization, Planning and Strategy
2/14/2020	Travis Close	1.1	\$850	\$935	Residency argreement misrepresentation/arbitration analysis -- # BKD0195803-BKD0197182 (460-490 of 669)	Discovery (Non-Deposition)
2/15/2020	Guy Wallace	0.9	\$1,350	\$1,215	analysis of parties' most recent settlement positions; P's maximum and minimum positions on settlement re damages and injunctive relief; com's with MTJ re same (.3)	Settlement
2/15/2020	Mark Johnson	2.0	\$1,150	\$2,300	revise and edit ltr to OC re overbreadth of document production. continue revising and adding to list of docs not to be produced; email to GBW re same	Discovery (Non-Deposition)
2/16/2020	Guy Wallace	1.7	\$1,350	\$2,295	review and analysis of model class cert declaration of a class member; revise and edit same	Class Certification
2/16/2020	Guy Wallace	0.4	\$1,350	\$540	review and analysis of draft letter from MTJ to D's re overbroad and burdensome productions of documents; revise and edit same; com's with MTJ re same	Communications With Opposing Counsel
2/16/2020	Mark Johnson	0.6	\$1,150	\$690	review discovery for RPDs seeking document related to ownership interests and operation of facilities; email to GBW re same	Discovery (Non-Deposition)
2/16/2020	Mark Johnson	0.4	\$1,150	\$460	finalize and send by email ltr to OC re overbreadth of document production	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/18/2020	Guy Wallace	2.9	\$1,350	\$3,915	review and analysis of D's portion of Statement of Discovery Issues; review and analysis of Declaration of JANK re same; com's with MTJ re same (.7)	Discovery (Non-Deposition)
2/18/2020	Guy Wallace	1.0	\$1,350	\$1,350	conf with MTJ; TCC; RES; LEC; re subpoenas to local building departments re new construction and alterations records; outreach to class members re declarations for class cert motion	Discovery (Non-Deposition)
2/18/2020	Guy Wallace	0.4	\$1,350	\$540	tc w/ GG; MTJ re response to D's portion of the statement of issues	Discovery (Non-Deposition)
2/18/2020	Guy Wallace	0.4	\$1,350	\$540	review and analysis of D's portion of statement of issues re Residency Agreements; com's with TCC re same	Discovery (Non-Deposition)
2/18/2020	Mark Johnson	0.8	\$1,150	\$920	review and analyze 20+ page statement from Defendant for joint statement re discovery status	Case Management Conferences
2/18/2020	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW and GCG re issues raised by Ds section on joint discovery statement and responses to same	Case Management Conferences
2/18/2020	Mark Johnson	1.8	\$1,150	\$2,070	further analysis of Ds section of joint discovery statment and draft responses to sections on separate categories of RFPs and Rogs in dispute.	Case Management Conferences
2/18/2020	Mark Johnson	1.5	\$1,150	\$1,725	mtg w/ GBW, Rachel, Brianda, TCC, LEC re subpoenas for building departmenets for construction history, class outreach procedures and revisions of same.	Case Organization, Planning and Strategy
2/18/2020	Mark Johnson	0.1	\$1,150	\$115	email exchanges w/ OC re rescheduling of meet and confer session on issues raised in Feb. 3, 5 and 7 letters	Discovery (Non-Deposition)
2/18/2020	Rachel Steyer	1.2	\$750	\$900	meeting w/GBW, MJ, and Travis (& Lourdes) to discuss discovery projects and state of class outreach; subpoenas	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/18/2020	Rachel Steyer	0.2	\$750	\$150	follow up conversation with Harold Staggs, discussed transmission of documents	Class Outreach and Contact
2/18/2020	Travis Close	0.9	\$850	\$765	Residency argreement misrepresentation/arbitration analysis -- # BKD0251096-BKD0251714 (529-538 of 669)	Case Organization, Planning and Strategy
2/18/2020	Travis Close	1.3	\$850	\$1,105	Meeting with team covering outreach & subpoenas to building departments	Case Organization, Planning and Strategy
2/18/2020	Travis Close	0.8	\$850	\$680	Create spreadsheet/database for contacting building departments for subpoena recordsa	Case Organization, Planning and Strategy
2/18/2020	Travis Close	0.3	\$850	\$255	Meet w/ RLS re: building department subpoenas	Case Organization, Planning and Strategy
2/18/2020	Travis Close	0.7	\$850	\$595	Analysis of Residency agreements -- email to GBW and MTJ	Case Organization, Planning and Strategy
2/18/2020	Travis Close	2.2	\$850	\$1,870	Research responsible agencies to accept service of subpoenas for building records for facilities (Alhambra - Citrus Heights)	Case Organization, Planning and Strategy
2/18/2020	Travis Close	1.6	\$850	\$1,360	Comments/responses to defendants' proposed section of the joint letter	Discovery (Non-Deposition)
2/19/2020	Guy Wallace	0.7	\$1,350	\$945	tc with Powers; Buffaloe; JANK; BU; MTJ; TCC re meet and confer re numerous discovery issues	Communications With Opposing Counsel
2/19/2020	Guy Wallace	6.8	\$1,350	\$9,180	review and analysis of D's portion of joint statement of issues; preparation of P's responses thereto	Other Motions
2/19/2020	Guy Wallace	0.8	\$1,350	\$1,080	com's with BU; MTJ; TCC re P's responses to D's portion of joint statement of issues	Other Motions
2/19/2020	Travis Close	1.4	\$850	\$1,190	Residency argreement misrepresentation/arbitration analysis -- # -BKD0232074-BKD0235121 (568-606 of 669)	Case Organization, Planning and Strategy
2/19/2020	Travis Close	0.7	\$850	\$595	Research FRCP rules for doc subpoenas	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/19/2020	Travis Close	0.1	\$850	\$85	Meet w/ MTJ re: Ds production of audit docs	Case Organization, Planning and Strategy
2/19/2020	Travis Close	1.5	\$850	\$1,275	Residency argreement misrepresentation/arbitration analysis -- # BKD0251714-BKD0232074 (538-568 of 669)	Discovery (Non-Deposition)
2/19/2020	Travis Close	1.5	\$850	\$1,275	Meet and confer call with MTJ, GBW, defendants re: 2/3, 2/5, 2/7 letters	Discovery (Non-Deposition)
2/20/2020	Guy Wallace	0.2	\$1,350	\$270	com's with Barker; Buffaloe et al re joint statement of issues	Communications With Opposing Counsel
2/20/2020	Guy Wallace	0.4	\$1,350	\$540	conf with BU; MTJ re discovery tasks re MTCs; follow up with other side to complete meet and confer	Discovery (Non-Deposition)
2/20/2020	Guy Wallace	4.8	\$1,350	\$6,480	preparation and drafting of joint statement of discovery issues	Other Motions
2/20/2020	Guy Wallace	0.6	\$1,350	\$810	com's with GG; MTJ re joint statement of issues and revisions thereto	Other Motions
2/20/2020	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW re latest revision of joint statement re discovery	Case Management Conferences
2/20/2020	Mark Johnson	1.3	\$1,150	\$1,495	review and edit latest draft of joint statement re discovery	Case Management Conferences
2/20/2020	Mark Johnson	1.0	\$1,150	\$1,150	mtg w/ GBW and Brian Umpierre to discuss proposed correspondence with OC re staffing analysis data, follow up re same, and potential motions to compel	Discovery (Non-Deposition)
2/20/2020	Mark Johnson	0.7	\$1,150	\$805	research and review production of floor plan related documents	Discovery (Non-Deposition)
2/20/2020	Mark Johnson	0.4	\$1,150	\$460	review and analyze memo from J Proctor analyzing categories of documents produced by Defendants in facility productions	Discovery (Non-Deposition)
2/20/2020	Mark Johnson	0.3	\$1,150	\$345	mtg w/ TCC to compare notes on meet and confer call of 2/19	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/20/2020	Mark Johnson	2.7	\$1,150	\$3,105	draft, review and finalize correspondence to OC confirming results of meet and confer session of 2/19; review notes to prepare same	Discovery (Non-Deposition)
2/20/2020	Mark Johnson	1.6	\$1,150	\$1,840	work on ltr to OC re failure to meet and confer in good faith and demanding final meet and confer re assessment and payroll data.	Discovery (Non-Deposition)
2/20/2020	Rachel Steyer	1.4	\$750	\$1,050	conducted intake with Carrie Biggs-Adams, updated sharepoint and client folder	Class Outreach and Contact
2/20/2020	Rachel Steyer	4.5	\$750	\$3,375	verifying corresponding public entities for subpoenas; preparing and checking attachments and PDFs, updating spreadsheet	Discovery (Non-Deposition)
2/20/2020	Travis Close	0.2	\$850	\$170	Review MTJ's proposed letter to opposing counsel re: summary of yesterday's M&C call	Case Organization, Planning and Strategy
2/21/2020	Guy Wallace	4.4	\$1,350	\$5,940	review and analysis of joint statement of discovery issues; revise and edit same	Other Motions
2/21/2020	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re discovery issues that are at impasses and MTC's re same	Other Motions
2/21/2020	Mark Johnson	0.8	\$1,150	\$920	review and analyze Ds revisions to their section of joint discovery statement (.5); confer w/ GBW re same (.3)	Case Management Conferences
2/21/2020	Mark Johnson	0.8	\$1,150	\$920	draft section of joint discovery statement responsive to Ds additions re production of assessment and payroll data; review GBW additions responsive to arguments on residency agreements and statistical significance	Case Management Conferences
2/21/2020	Mark Johnson	1.5	\$1,150	\$1,725	further conference x 3 w/ GBW re joint discovery statement, analysis of D's additions to same and potential responses.	Case Management Conferences
2/21/2020	Mark Johnson	1.1	\$1,150	\$1,265	complete draft of ltr demanding final meet and confer on assessment and payroll data; confer w/ GBW, BU re same	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/21/2020	Mark Johnson	0.7	\$1,150	\$805	identify and draft email to OC listing items for which further meet and confer is requested; com w/ GBW re same (.1)	Discovery (Non-Deposition)
2/21/2020	Mark Johnson	2.5	\$1,150	\$2,875	review doc production and index for futher identification of docs to be produced from individual faciiliites	Discovery (Non-Deposition)
2/21/2020	Mark Johnson	0.3	\$1,150	\$345	mtgs w/ JMP, TCC re verification of completeness of DSS production; follow up emails w/ TCC re same and service of additional subpoens	Discovery (Non-Deposition)
2/21/2020	Mark Johnson	0.4	\$1,150	\$460	retrieve and analyze doc review memos; email to COC seeking input for meet and confer session / MTC operating budgets	Discovery (Non-Deposition)
2/21/2020	Rachel Steyer	5.6	\$750	\$4,200	calling proposed class members/responsible parties; updating sharepoint, scheduling intake calls for next week	Class Outreach and Contact
2/21/2020	Travis Close	0.6	\$850	\$510	Analyze which docs/facilities were missing from DSS	Case Organization, Planning and Strategy
2/21/2020	Travis Close	0.5	\$850	\$425	Residency argreement misrepresentation/arbitration analysis -- # BKD0242340-BKD0262993 (621-636 of 669)	Case Organization, Planning and Strategy
2/21/2020	Travis Close	0.4	\$850	\$340	Review/analyze Ds joint statement portion (final draft) and Jeff K's declaration	Discovery (Non-Deposition)
2/21/2020	Travis Close	0.9	\$850	\$765	Residency argreement misrepresentation/arbitration analysis -- # BKD0235121-BKD0242340 (606-621 of 669)	Discovery (Non-Deposition)
2/22/2020	Guy Wallace	0.5	\$1,350	\$675	review and analysis of D's shifting positions re whether they would produce local policy documents from the facilities, including ADA policy and practice documents re RFP No. 10	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/24/2020	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re preparation for 2/27 hearing re discovery issues	Discovery (Non-Deposition)
2/24/2020	Guy Wallace	0.4	\$1,350	\$540	com's with TCC re analysis of D's production of approx 1,000 Residency Agreements and representations contained therein and rate of opt out from arbitration agreement	Discovery (Non-Deposition)
2/24/2020	Mark Johnson	0.4	\$1,150	\$460	mtg w/ TCC re identification of tasks, including preparation and service of additional DSS subpoens for former Brookdale facilities, review of documetns to identify irrelevant docs to be excluded.and work with Brianda on outreache	Case Organization, Planning and Strategy
2/24/2020	Mark Johnson	0.1	\$1,150	\$115	email exchanges w/ BU and David Marks re relevance and use of budget documents	Discovery (Non-Deposition)
2/24/2020	Mark Johnson	0.6	\$1,150	\$690	review and edit dtraft attachent to new DSS subpoenas, review prior emails w/ Deputy AG re scope of production agreed to to inform same; com w/ TCC re same	Discovery (Non-Deposition)
2/24/2020	Mark Johnson	1.8	\$1,150	\$2,070	review latest doc production from Defendants and analyze for new types of documents and production of docs identified as irrelevant and asked to be excluded.	Discovery (Non-Deposition)
2/24/2020	Mark Johnson	1.3	\$1,150	\$1,495	review overall index of document production from defendants for further identification of document titles that can be excluded.	Discovery (Non-Deposition)
2/24/2020	Rachel Steyer	1.7	\$750	\$1,275	conducted intake call w/proposed class member, updated shareopint, created client folder	Class Outreach and Contact
2/24/2020	Rachel Steyer	0.4	\$750	\$300	started intake call with Lisa Ortiz; created client folder, updated contact info in Sharepoint	Class Outreach and Contact
2/24/2020	Rachel Steyer	0.2	\$750	\$150	started intake w/proposed class member, had to reschedule so he could review his files	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/24/2020	Travis Close	1.2	\$850	\$1,020	Residency argreement misrepresentation/arbitration analysis -- # BKD0262993-BKD0268527 (636-669 of 669)	Case Organization, Planning and Strategy
2/24/2020	Travis Close	0.6	\$850	\$510	Update arbitration opt-out analysis and send details to team	Case Organization, Planning and Strategy
2/24/2020	Travis Close	0.6	\$850	\$510	Meet w/ MTJ re: next subpoena and doc indexing assignmetns for this week	Case Organization, Planning and Strategy
2/24/2020	Travis Close	0.8	\$850	\$680	Draft template for former DSS facilty subpoenas	Case Organization, Planning and Strategy
2/24/2020	Travis Close	1.3	\$850	\$1,105	Research counties of former CA Brookdale facilities and the respective DSS regional offices	Case Organization, Planning and Strategy
2/24/2020	Travis Close	1.1	\$850	\$935	Analyze differences between 2016 and 2018 residency agreements	Case Organization, Planning and Strategy
2/24/2020	Travis Close	0.1	\$850	\$85	Call w/ Brookdale class member Carol Evans	Class Outreach and Contact
2/24/2020	Travis Close	0.8	\$850	\$680	Search for "Exhibit Z" residency agreement attachments	Discovery (Non-Deposition)
2/24/2020	Travis Close	0.3	\$850	\$255	Residency agreement review -- # BKD0276938-BKD0277323 (1-11 of 295)	Discovery (Non-Deposition)
2/25/2020	Guy Wallace	1.6	\$1,350	\$2,160	review and analysis of joint statement of issues; memo from MTJ re status of discovery; preparation for discovery hearing with MJ Beeler on 2/27	Discovery (Non-Deposition)
2/25/2020	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re D's most recent production of documents and parts of complaints database; preparation for hearing re discovery with MJ Beeler	Discovery (Non-Deposition)
2/25/2020	Rachel Steyer	1.7	\$750	\$1,275	intake call with proposed class member Clarence Alvey	Class Outreach and Contact
2/25/2020	Rachel Steyer	1.3	\$750	\$975	intake call with proposed class member Dwight Benson, updating sharepoint, creating client folder	Class Outreach and Contact
2/25/2020	Rachel Steyer	0.7	\$750	\$525	partial intake call with proposed class member	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/25/2020	Rachel Steyer	2.4	\$750	\$1,800	class outreach to proposed class members, leaving VMs, scheduling intake calls, updating sharepoint	Class Outreach and Contact
2/25/2020	Travis Close	1.3	\$850	\$1,105	Beging drafting new subpoenas to DSS offices re: former Brookdale facility files	Case Organization, Planning and Strategy
2/25/2020	Travis Close	1.1	\$850	\$935	Continue drafting new subpoenas to DSS offices re: former Brookdale facility files	Case Organization, Planning and Strategy
2/25/2020	Travis Close	1.2	\$850	\$1,020	Residency agreement review -- # BKD0277323-BKD0278300 (11-34 of 295)	Discovery (Non-Deposition)
2/25/2020	Travis Close	0.9	\$850	\$765	Draft attachments to DDS office subpoenas for former facilities	Discovery (Non-Deposition)
2/25/2020	Travis Close	1.9	\$850	\$1,615	Finish drafting/editing subpoenas to DSS and attachments	Discovery (Non-Deposition)
2/26/2020	Guy Wallace	0.4	\$1,350	\$540	coms with GG; BU re preparation for discovery conference w/ MJ Beeler	Discovery (Non-Deposition)
2/26/2020	Guy Wallace	3.3	\$1,350	\$4,455	preparation of notes re discovery conference with MJ Beeler; revise and edit same	Discovery (Non-Deposition)
2/26/2020	Guy Wallace	0.6	\$1,350	\$810	coms with MTJ re preparation for discovery conference with MJ Beeler	Discovery (Non-Deposition)
2/26/2020	Mark Johnson	0.5	\$1,150	\$575	calls w/ GBW (x2) re status of third party subpoenas, other discovery, meet and confer schedule, strategy for discovery conference	Discovery (Non-Deposition)
2/26/2020	Mark Johnson	0.4	\$1,150	\$460	mtg w/ TCC re discovery related projects and results and further analysis of residency agreements	Discovery (Non-Deposition)
2/26/2020	Rachel Steyer	0.6	\$750	\$450	follow up intake call with proposed class member	Class Outreach and Contact
2/26/2020	Rachel Steyer	0.4	\$750	\$300	phone call with BCR to discuss class outreach	Class Outreach and Contact
2/26/2020	Rachel Steyer	1.2	\$750	\$900	conducted intake with proposed class member, created folder, updated sharepoint	Class Outreach and Contact
2/26/2020	Rachel Steyer	1.2	\$750	\$900	conducted intake with proposed class member, created client folder, updated sharepoint, sent her email to f/u re sending docs	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/26/2020	Rachel Steyer	3.6	\$750	\$2,700	attempted outreach calls with proposed class members, updating sharepoint, scheduling intake calls	Class Outreach and Contact
2/26/2020	Travis Close	1.1	\$850	\$935	Residency agreement review -- # BKD0278300-BKD0279156 (34-55 of 295)	Discovery (Non-Deposition)
2/26/2020	Travis Close	1.0	\$850	\$850	Residency agreement review -- # BKD0279156-BKD0280744 (55-84 of 295)	Discovery (Non-Deposition)
2/26/2020	Travis Close	1.2	\$850	\$1,020	Residency agreement review -- # BKD0280744-BKD0282507 (84-114 of 295)	Discovery (Non-Deposition)
2/26/2020	Travis Close	1.3	\$850	\$1,105	Residency agreement review -- # BKD0282507-BKD0303492 (114-144 of 295)	Discovery (Non-Deposition)
2/26/2020	Travis Close	1.0	\$850	\$850	Residency agreement review -- # BKD0303492-BKD0306353 (144-177 of 295)	Discovery (Non-Deposition)
2/26/2020	Travis Close	1.3	\$850	\$1,105	Residency agreement review -- # BKD0306353-BKD0307682 (177-208 of 295)	Discovery (Non-Deposition)
2/26/2020	Travis Close	1.2	\$850	\$1,020	Residency agreement review -- # BKD0306353-BKD0307682 (208-238 of 295)	Discovery (Non-Deposition)
2/26/2020	Travis Close	0.5	\$850	\$425	Residency agreement review -- # BKD0307682-BKD0310086 (238-256 of 295)	Discovery (Non-Deposition)
2/27/2020	Guy Wallace	3.5	\$1,350	\$4,725	prepare for and attend discovery conference with MJ Beeler	Discovery (Non-Deposition)
2/27/2020	Guy Wallace	0.5	\$1,350	\$675	preparation and drafting of stipulation and proposed order re schedule and recommendation of MJ Beeler; com with MTJ re same	Discovery (Non-Deposition)
2/27/2020	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re further meet and confer with Defendants set for 2/28 and potential MTCs	Discovery (Non-Deposition)
2/27/2020	Guy Wallace	0.6	\$1,350	\$810	legal research and analysis re cases re statewide class discovery re multiple facilities	Discovery (Non-Deposition)
2/27/2020	Mark Johnson	3.0	\$1,150	\$3,450	appear for discovery conference w/ Judge Beeler	Case Management Conferences

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/27/2020	Mark Johnson	0.2	\$1,150	\$230	com w/ BCR re class outreach status, first intake, coordiantion with RLS	Class Outreach and Contact
2/27/2020	Mark Johnson	0.2	\$1,150	\$230	com w/ RLS re class outreach status of intakes, coordination with BCR	Class Outreach and Contact
2/27/2020	Mark Johnson	0.8	\$1,150	\$920	mtg w/ GBW prior to discovery conference w/ Judge Beeler re strategy for argument	Discovery (Non-Deposition)
2/27/2020	Mark Johnson	0.2	\$1,150	\$230	confer w/ OC re complaints database following discovery conference with court	Discovery (Non-Deposition)
2/27/2020	Mark Johnson	0.2	\$1,150	\$230	confer w/ COC following discovery conference re next steps, proposed stipulation,	Discovery (Non-Deposition)
2/27/2020	Mark Johnson	0.8	\$1,150	\$920	further review of complaint database cvs file and resarch re importaion of same to MS Access	Discovery (Non-Deposition)
2/27/2020	Mark Johnson	0.4	\$1,150	\$460	mtg w/ Brian U to discuss strategy for call w/ OC re payroll and assessment data and issues related to same	Discovery (Non-Deposition)
2/27/2020	Rachel Steyer	0.6	\$750	\$450	communications w/proposed class member about the case, scheduled time to speak, updated contact information	Class Outreach and Contact
2/27/2020	Rachel Steyer	0.4	\$750	\$300	spoke with proposed class member, discussed the case, conducted brief intake but determined there were no issues/complaints	Class Outreach and Contact
2/27/2020	Rachel Steyer	2.0	\$750	\$1,500	intake with Rachel Lucero-Ailworth; updated sharepoint, created client folder	Class Outreach and Contact
2/27/2020	Rachel Steyer	3.9	\$750	\$2,925	attempted class outreach, scheduling intake calls, updating sharepoint	Class Outreach and Contact
2/27/2020	Rachel Steyer	0.2	\$750	\$150	brief conversation with proposed class member about Stiner/Eidler case	Class Outreach and Contact
2/27/2020	Travis Close	1.5	\$850	\$1,275	travel to discovery hearing w/ magistrate judge beeler (walk, BART to SF, walk to court)	Discovery (Non-Deposition)
2/27/2020	Travis Close	3.3	\$850	\$2,805	Discovery hearing with magistrate judge beeler	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/27/2020	Travis Close	0.9	\$850	\$765	Ride back to office from hearing w/ GBW, MTJ	Discovery (Non-Deposition)
2/27/2020	Travis Close	0.8	\$850	\$680	Residency agreement review -- # BKD0310086-BKD0321604 (256-277 of 295)	Discovery (Non-Deposition)
2/27/2020	Travis Close	0.7	\$850	\$595	Residency agreement review -- # BKD0321604-BKD0323426 (277-295 of 295)	Discovery (Non-Deposition)
2/28/2020	Guy Wallace	0.3	\$1,350	\$405	review and analysis of discovery order from MJ Beeler; com's with BU; MTJ re same	Discovery (Non-Deposition)
2/28/2020	Mark Johnson	0.4	\$1,150	\$460	prep for meet and confer w/ OC re payroll and assessment data, including review of correspondence and notes of prior call	Discovery (Non-Deposition)
2/28/2020	Rachel Steyer	1.8	\$750	\$1,350	intake with proposed class member Lisa Ortiz, updating client folder & sharepoint, reviewing client docs, correspondence	Class Outreach and Contact
2/28/2020	Rachel Steyer	1.3	\$750	\$975	intake call with proposed class member Luella/Peter Andersen, updating sharepoint, creating client folder	Class Outreach and Contact
2/28/2020	Rachel Steyer	1.2	\$750	\$900	reviewing intake conducted by BCR, giving feedback	Class Outreach and Contact
2/28/2020	Rachel Steyer	1.3	\$750	\$975	intake with proposed class member Virginia Anderson, updating sharepoint, creating class member folder	Class Outreach and Contact
2/28/2020	Rachel Steyer	1.2	\$750	\$900	attempted class outreach, updating Sharepoint, scheduling follow up calls	Class Outreach and Contact
2/28/2020	Travis Close	1.3	\$850	\$1,105	Analyze residency agreement representation/opt out language -- # BKD0277691-BKD0278787 (21-46 of 294)	Case Organization, Planning and Strategy
2/28/2020	Travis Close	1.0	\$850	\$850	Analyze residency agreement representation/opt out language -- # -BKD0278787-BKD0280028 (46-70 of 294)	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/28/2020	Travis Close	1.1	\$850	\$935	Analyze residency agreement representation/opt out language -- # BKD0276938-BKD0277691 (1-21 of 294)	Discovery (Non-Deposition)
2/29/2020	Mark Johnson	0.1	\$1,150	\$115	com w/ GBW re authority for letter brief re databases.	Discovery (Non-Deposition)
3/1/2020	Guy Wallace	1.1	\$1,350	\$1,485	legal research and analysis re D's obligation to produce databases	Discovery (Non-Deposition)
3/1/2020	Mark Johnson	1.8	\$1,150	\$2,070	begin drafting discovery ltr re payroll and PSS data	Other Motions
3/2/2020	Guy Wallace	0.5	\$1,350	\$675	com's with Waters; MTJ re expert site inspection schedule; standards applied re new construction and alteration of assisted living facilities	Experts (Including Retention)
3/2/2020	Mark Johnson	2.5	\$1,150	\$2,875	further review and analysis of document production for identification of docs that should not be produced; add notes and commentary to chart of same by frequency of occurrence	Discovery (Non-Deposition)
3/2/2020	Mark Johnson	0.3	\$1,150	\$345	coms w/ TCC re revised subpoena for Building and safety docs from LA county, calendaring production due dates on all subpoenas	Discovery (Non-Deposition)
3/2/2020	Mark Johnson	3.5	\$1,150	\$4,025	continue drafting joint letter re payroll and PSS data and technical materials	Other Motions
3/2/2020	Mark Johnson	1.7	\$1,150	\$1,955	legal resarch on discovery and production of databases for joint letter brief / MTC production of payroll and PSS data	Other Motions
3/2/2020	Travis Close	0.4	\$850	\$340	Review Ds first set of RFPs to Ps	Case Organization, Planning and Strategy
3/2/2020	Travis Close	1.1	\$850	\$935	Analyze residency agreement representation/opt out language -- # BKD0280028-BKD0281168 (70-92 of 294)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/2/2020	Travis Close	1.3	\$850	\$1,105	Analyze residency agreement representation/opt out language -- # BKD0281168-BKD0282621 (92-118 of 294)	Discovery (Non-Deposition)
3/2/2020	Travis Close	1.2	\$850	\$1,020	Analyze residency agreement representation/opt out language -- # BKD0282621-BKD0303523 (118-146 of 294)	Discovery (Non-Deposition)
3/2/2020	Travis Close	1.0	\$850	\$850	Analyze residency agreement representation/opt out language -- # BKD0303523-BKD0306480 (146-181 of 294)	Discovery (Non-Deposition)
3/3/2020	Guy Wallace	0.1	\$1,350	\$135	com's with Barker; Powers et al. re draft stipulation and order re class cert schedule	Communications With Opposing Counsel
3/3/2020	Guy Wallace	0.4	\$1,350	\$540	com's with GG; JY; KAS; BU re schedule re discovery; D's discovery re named P's	Discovery (Non-Deposition)
3/3/2020	Guy Wallace	0.9	\$1,350	\$1,215	preparation and drafting of stipulation and proposed order re class cert schedule; com's with MTJ re same	Other Motions
3/3/2020	Mark Johnson	0.2	\$1,150	\$230	call with official from City of Santa Rosa re compliance with subpoena and demand for court order or affidavit / consent from owner and design professional	Discovery (Non-Deposition)
3/3/2020	Mark Johnson	0.6	\$1,150	\$690	research statutory limitations on duplication of building plans and designs and case law re same for response to Santa Rosa City official communication re same	Discovery (Non-Deposition)
3/3/2020	Mark Johnson	0.2	\$1,150	\$230	review emails from Titan Legal Services and Santa Rosa City official re response to document subpoena and coms w/ TCC re same	Discovery (Non-Deposition)
3/3/2020	Mark Johnson	0.6	\$1,150	\$690	preliminary review of D's first set of rogs and RPDs to each of Plaintiffs (.4), com w/ GBW (.2) re same	Discovery (Non-Deposition)
3/3/2020	Mark Johnson	3.3	\$1,150	\$3,795	work on letter brief re ESI	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/3/2020	Mark Johnson	1.7	\$1,150	\$1,955	legal research for letter briefs on ESI and payroll / PSS data	Other Motions
3/3/2020	Mark Johnson	1.0	\$1,150	\$1,150	revise and add to draft ltr brief re PSS and payroll data	Other Motions
3/3/2020	Mark Johnson	0.3	\$1,150	\$345	review and edit draft stipulation re case schedule and class certification deadline	Pleadings and Motions Re: Pleadings
3/3/2020	Rachel Steyer	5.1	\$750	\$3,825	attempted proposed class outreach, scheduling intake calls, updating sharepoint	Class Outreach and Contact
3/3/2020	Travis Close	0.5	\$850	\$425	Email to MTJ and GBW re: Tracy residency agreement analysis	Case Organization, Planning and Strategy
3/3/2020	Travis Close	1.1	\$850	\$935	Analyze residency agreement representation/opt out language -- # BKD0306480-BKD0307297 (181-201 of 294)	Case Organization, Planning and Strategy
3/3/2020	Travis Close	0.3	\$850	\$255	Legal research re: compliance with subpoenas	Case Organization, Planning and Strategy
3/3/2020	Travis Close	0.9	\$850	\$765	Analyze residency agreement representation/opt out language -- # BKD0307297-BKD0308484 (201-226 of 294)	Case Organization, Planning and Strategy
3/3/2020	Travis Close	0.2	\$850	\$170	Analyze/update facility spreadsheet with recent inspections data	Case Organization, Planning and Strategy
3/3/2020	Travis Close	1.1	\$850	\$935	Analyze residency agreement representation/opt out language -- # BKD0308484-BKD0309922 (226-253 of 294)	Case Organization, Planning and Strategy
3/3/2020	Travis Close	0.3	\$850	\$255	Meet w/ LEC re: tasks for this week	Case Organization, Planning and Strategy
3/3/2020	Travis Close	1.0	\$850	\$850	Analyze residency agreement representation/opt out language -- # BKD0309922-BKD0321505 (253-274 of 294)	Case Organization, Planning and Strategy
3/3/2020	Travis Close	0.6	\$850	\$510	Create chart and update status for building records subpoenas	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/3/2020	Travis Close	1.1	\$850	\$935	Analyze residency agreement representation/opt out language -- # BKD0321505-BKD0323310 (274-294 of 294)	Discovery (Non-Deposition)
3/4/2020	Mark Johnson	0.3	\$1,150	\$345	com w/ OC re word versions of rogs and RFP; draft instructions to LEC re creating templates of responses; talk to her re same	Discovery (Non-Deposition)
3/4/2020	Mark Johnson	0.1	\$1,150	\$115	draft email to OC re production of complaint database	Discovery (Non-Deposition)
3/4/2020	Mark Johnson	0.2	\$1,150	\$230	draft email to OC Buffaloe re failure to meet and confer on ESI and PSS/Kronos data and need to file letter briefs	Discovery (Non-Deposition)
3/4/2020	Mark Johnson	4.7	\$1,150	\$5,405	finalize P's sections of draft letter briefs on ESI and PSS/Kronos data; draft email to GBW (.2) explaining approach and suggesting timing for servng same	Other Motions
3/4/2020	Rachel Steyer	1.8	\$750	\$1,350	intake call w/proposed class member, created client file, updated sharepoint	Class Outreach and Contact
3/4/2020	Rachel Steyer	0.2	\$750	\$150	started to conduct intake w/proposed class member but had to reschedule b/c she wished to speak w/her daughter about case	Class Outreach and Contact
3/4/2020	Rachel Steyer	4.4	\$750	\$3,300	attempted outreach with proposed class members & responsible parties, leaving VMs, updating sharepoint/contact info, scheduling future intake calls	Class Outreach and Contact
3/4/2020	Travis Close	0.4	\$850	\$340	Meet w/ MTJ re: Executive director research assignment	Case Organization, Planning and Strategy
3/4/2020	Travis Close	1.6	\$850	\$1,360	continue researching executive directors and other managers of facilities (Anaheim, Anaheim Hills)	Case Organization, Planning and Strategy
3/4/2020	Travis Close	0.2	\$850	\$170	Review MTJ's draft stipulation/motion to compel re: ESI data	Case Organization, Planning and Strategy
3/4/2020	Travis Close	0.2	\$850	\$170	Review MTJ's draft stipulation/motion to compel re: ESI data	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/4/2020	Travis Close	1.3	\$850	\$1,105	continue researching executive directors and other managers of facilities (Brea-Brookhurst)	Case Organization, Planning and Strategy
3/4/2020	Travis Close	0.9	\$850	\$765	continue researching executive directors and other managers of facilities (Camarillo)	Case Organization, Planning and Strategy
3/4/2020	Travis Close	1.4	\$850	\$1,190	Begin researching executive directors and other managers of facilities (Alhambra)	Discovery (Non-Deposition)
3/4/2020	Travis Close	1.2	\$850	\$1,020	continue researching executive directors and other managers of facilities (Auburn-Bakersfield)	Discovery (Non-Deposition)
3/5/2020	Guy Wallace	1.3	\$1,350	\$1,755	legal research and analysis re recent case law re CLRA and misrepresentations and exposure to false or misleading statements	Class Certification
3/5/2020	Guy Wallace	0.8	\$1,350	\$1,080	revise and edit draft joint letter brief re D's failure to produce ESI; com's with MTJ re same (.3)	Other Motions
3/5/2020	Guy Wallace	0.7	\$1,350	\$945	revise and edit joint letter brief re D's failure to produce data re evaluations and staffing; com's with MTJ re same (.2)	Other Motions
3/5/2020	Mark Johnson	0.3	\$1,150	\$345	com w/ GBW re revisions to ltr briefs on ESI and PSS/Kronos data	Other Motions
3/5/2020	Mark Johnson	0.5	\$1,150	\$575	make revisions to draft ltr briefs (Ps sections) on ESI and PSS / Kronos data	Other Motions
3/5/2020	Mark Johnson	1.2	\$1,150	\$1,380	review and incorporate further input from 'GBW, TCC and COC re draft sections of letter briefs on ESI amd PSS/Kronos data; identify and include exhibits for same	Other Motions
3/5/2020	Mark Johnson	2.8	\$1,150	\$3,220	review and analyze all 4 sets of RFPs to identify those thst require sersrch terms of ltr brief; ; prepare spreadsheet of same; emai to OC re same for input (.1)	Other Motions
3/5/2020	Rachel Steyer	1.3	\$750	\$975	reviewing BCR intakes and communicating how to improve	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/5/2020	Rachel Steyer	0.4	\$750	\$300	conversation with proposed class member explaining the case, scheduled time for intake	Class Outreach and Contact
3/5/2020	Rachel Steyer	3.2	\$750	\$2,400	attempted class outreach, scheduling follow up calls, updating contact info in Sharepoint	Class Outreach and Contact
3/5/2020	Travis Close	0.5	\$850	\$425	Review MTJ's draft portion of ESI brief and research amount of discovery at aug 2019	Case Organization, Planning and Strategy
3/5/2020	Travis Close	1.3	\$850	\$1,105	Continue researching/ identifying names of executives and managers at Brookdale facilities (Central Whittier, Chanate)	Case Organization, Planning and Strategy
3/5/2020	Travis Close	1.0	\$850	\$850	Continue researching/ identifying names of executives and managers at Brookdale facilities (Chatsworth, Clairemont)	Case Organization, Planning and Strategy
3/5/2020	Travis Close	0.7	\$850	\$595	Continue researching/ identifying names of executives and managers at Brookdale facilities (Corona)	Case Organization, Planning and Strategy
3/5/2020	Travis Close	1.2	\$850	\$1,020	Continue researching/ identifying names of executives and managers at Brookdale facilities (Carlsbad, Carmel Valley)	Discovery (Non-Deposition)
3/5/2020	Travis Close	0.4	\$850	\$340	Review MTJ's joint letter brief re: PSS and Kronos data	Discovery (Non-Deposition)
3/5/2020	Travis Close	1.0	\$850	\$850	Continue researching/ identifying names of executives and managers at Brookdale facilities (Chatsworth)	Discovery (Non-Deposition)
3/6/2020	Guy Wallace	0.7	\$1,350	\$945	prepare for and participate in tc with JY; BBK; AX; MTJ; TCC re responding to D's written discovery to the named Plaintiffs	Discovery (Non-Deposition)
3/6/2020	Guy Wallace	0.3	\$1,350	\$405	tc with Waters re Brookdale site inspections and use of construction valuation/estimation expert re readily achievable and remediation issues	Experts (Including Retention)
3/6/2020	Guy Wallace	0.6	\$1,350	\$810	revise and edit proposed stipulation and order re schedule on class certification; com's with Powers; Buffaloe re same	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/6/2020	Guy Wallace	0.8	\$1,350	\$1,080	com's with MTJ; TCC re further motions to compel re policy and procedure documents; operating budgets; responses to interrogatories	Other Motions
3/6/2020	Mark Johnson	0.6	\$1,150	\$690	conference call with COC re responses to D's rogs and rfp's to P's and coms w/ Ps re same	Discovery (Non-Deposition)
3/6/2020	Mark Johnson	1.8	\$1,150	\$2,070	begin working on drafting template for objections and responses to D's Rogs to Ps for	Discovery (Non-Deposition)
3/6/2020	Mark Johnson	1.0	\$1,150	\$1,150	mtg w/ GBW, TCC to discuss priorities and strategies for motions to compel	Other Motions
3/6/2020	Rachel Steyer	1.1	\$750	\$825	conducting intake with proposed class member Bill Atthowe, updating sharepoint, creating client folder	Class Outreach and Contact
3/6/2020	Rachel Steyer	1.4	\$750	\$1,050	conducted intake with proposed class member, created client folder, updated sharepoint	Class Outreach and Contact
3/6/2020	Rachel Steyer	0.8	\$750	\$600	conducted partial intake w/proposed class member, created client folder, updated sharepoint	Class Outreach and Contact
3/6/2020	Rachel Steyer	2.1	\$750	\$1,575	attempted class outreach, scheduling follow up intakes, updating Sharepoint	Class Outreach and Contact
3/6/2020	Rachel Steyer	0.9	\$750	\$675	conducted partial intake with class member	Class Outreach and Contact
3/6/2020	Travis Close	0.7	\$850	\$595	Edit/draft additional search terms for RFPs	Case Organization, Planning and Strategy
3/6/2020	Travis Close	1.3	\$850	\$1,105	Meet w/ GBW, MTJ re: issues ripe for discovery briefing/motions to compel	Case Organization, Planning and Strategy
3/6/2020	Travis Close	1.2	\$850	\$1,020	Begin joint letter brief re: IDs of class members with disabilities	Case Organization, Planning and Strategy
3/6/2020	Travis Close	0.2	\$850	\$170	Prepare for team meeting re: responding to Ds discovery	Discovery (Non-Deposition)
3/6/2020	Travis Close	0.9	\$850	\$765	Meeting w/ MTJ, GBW, and co-counsel re: responding to Ds discovery on Plaintiffs	Discovery (Non-Deposition)
3/6/2020	Travis Close	0.8	\$850	\$680	Executive Director and other executives facility research assignment (Cortona Park)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/6/2020	Travis Close	0.8	\$850	\$680	Executive Director and other executives facility research assignment (Danville, Diablo Lodge)	Discovery (Non-Deposition)
3/6/2020	Travis Close	0.2	\$850	\$170	Review Jeff K's letter re: ESI and access database	Discovery (Non-Deposition)
3/8/2020	Guy Wallace	1.4	\$1,350	\$1,890	preparation and drafting of motion to compel re Residency Agreements and database re same	Other Motions
3/9/2020	Guy Wallace	1.6	\$1,350	\$2,160	revise and edit model class cert declaration of Helen Carlson	Class Certification
3/9/2020	Guy Wallace	0.9	\$1,350	\$1,215	revise and edit draft class cert declaration of Algarne	Class Certification
3/9/2020	Guy Wallace	0.7	\$1,350	\$945	preparation and drafting of motion to compel re Residency Agreements	Other Motions
3/9/2020	Guy Wallace	0.2	\$1,350	\$270	com's with Barker; JANK; Buffalo; MTJ re MTCs and production of complaints database	Other Motions
3/9/2020	Guy Wallace	0.3	\$1,350	\$405	com's with Barker; Buffalo; JANK; MTJ re joint letter brief re Residency Agreements	Other Motions
3/9/2020	Rachel Steyer	0.8	\$750	\$600	reviewing draft declarations template from GBW	Discovery (Non-Deposition)
3/9/2020	Travis Close	0.6	\$850	\$510	Continue drafting joint letter brief re: contact info for residents with disabilities	Case Organization, Planning and Strategy
3/9/2020	Travis Close	0.4	\$850	\$340	Begin section of joint letter brief re: emrgency evacuation & transportation policies	Case Organization, Planning and Strategy
3/9/2020	Travis Close	0.3	\$850	\$255	Meet with LEC and Brianda re: class outreach issues	Class Outreach and Contact
3/9/2020	Travis Close	2.6	\$850	\$2,210	Continue drafting discovery letter to Defendants re: information from residents with disabilities	Discovery (Non-Deposition)
3/9/2020	Travis Close	2.2	\$850	\$1,870	Continue drafting joint letter brief re: contact info for residents with disabilities	Discovery (Non-Deposition)
3/10/2020	Guy Wallace	0.5	\$1,350	\$675	com's with opposing counsel re D's ongoing failure to produce responsive documents and ESI; com's with MTJ re same	Communications With Opposing Counsel
3/10/2020	Guy Wallace	0.1	\$1,350	\$135	review and analysis of signed stipulation and Order re schedule from Judge Gilliam	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/10/2020	Guy Wallace	0.6	\$1,350	\$810	revise and edit draft MTC re D's failure to provide information or ESI re number of persons with disabilities; com's with TCC re same	Other Motions
3/10/2020	Guy Wallace	0.4	\$1,350	\$540	review and analysis of TCC draft of MTC re D's non-production of policy documents re accessible transportation and emergency evacuation	Other Motions
3/10/2020	Mark Johnson	0.1	\$1,150	\$115	com w/ GBW re ltr brief iso mtn to compel info re number of persons with disabilities, rogs on which motion is based.	Other Motions
3/10/2020	Mark Johnson	0.2	\$1,150	\$230	review TCC draft ltr brief iso mtn to comple info re number of residents with mobility disabilities.	Other Motions
3/10/2020	Rachel Steyer	1.1	\$750	\$825	intake call with John Ballinger, updated sharepoint, created client folder	Class Outreach and Contact
3/10/2020	Travis Close	0.2	\$850	\$170	Email to Kristelle (Titan) re: subpoena to Santa Rosa	Case Organization, Planning and Strategy
3/10/2020	Travis Close	2.0	\$850	\$1,700	Reasearch coverage under ADA of persons needing help with activities of daily living	Case Organization, Planning and Strategy
3/10/2020	Travis Close	0.3	\$850	\$255	Call w/ class member patricia canepa	Class Outreach and Contact
3/10/2020	Travis Close	2.5	\$850	\$2,125	Continue drafting joint letter re: emergency evac and planning and accessible transport policies/procedures	Discovery (Non-Deposition)
3/10/2020	Travis Close	1.0	\$850	\$850	Continue drafting joint letter re: emergency evac and planning and accessible transport policies/procedures	Discovery (Non-Deposition)
3/10/2020	Travis Close	1.0	\$850	\$850	Continue drafting/editing Joint letter section re: emergency evacuation, planning, and accessible transport	Discovery (Non-Deposition)
3/11/2020	Guy Wallace	0.5	\$1,350	\$675	review and analysis of joint letter re D's failure to produce PSS and Kronos databases; com's with MTJ re same	Other Motions
3/11/2020	Rachel Steyer	1.6	\$750	\$1,200	intake call with Stephen Baggott, updating Sharepoint, creating client folder	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/11/2020	Rachel Steyer	1.7	\$750	\$1,275	intake call with Cathy Balint-Karr, creating client folder, updating sharepoint, emailing contact info	Class Outreach and Contact
3/11/2020	Rachel Steyer	0.3	\$750	\$225	conversation w/proposed class member	Class Outreach and Contact
3/11/2020	Rachel Steyer	2.8	\$750	\$2,100	attempted class outreach, updating sharepoint, scheduling intakes	Class Outreach and Contact
3/11/2020	Travis Close	1.3	\$850	\$1,105	Research case law on commonality and system-wide policies	Case Organization, Planning and Strategy
3/11/2020	Travis Close	0.1	\$850	\$85	Meet w/ GBW re: deadline to Ds for filing joint letter brief	Case Organization, Planning and Strategy
3/11/2020	Travis Close	1.1	\$850	\$935	Residency Agreement review -- # BKD0323426-BKD0347271 (1-15 of 15)	Discovery (Non-Deposition)
3/11/2020	Travis Close	0.1	\$850	\$85	Email to Titan Legal re: subpoena to Oakland DSS office	Discovery (Non-Deposition)
3/11/2020	Travis Close	0.5	\$850	\$425	Finalize joint letter re: IDs of PWDs and send to opposing counsel	Discovery (Non-Deposition)
3/12/2020	Guy Wallace	0.4	\$1,350	\$540	com's with Buffaloe; MTJ re joint letter re D's production of Residency Agreements; D's production of 750,000 pages of Residency Agreements and cover letter re same	Other Motions
3/12/2020	Mark Johnson	0.4	\$1,150	\$460	review cover letter and data link for production from Ds of Residency Agreement / Database; confer w/ James Dion re issues downloading same and getting it uploaded to relativity; call to OMM staff attorney re same, email to GBW re cover letter and processing issues	Discovery (Non-Deposition)
3/12/2020	Mark Johnson	1.0	\$1,150	\$1,150	review each of 8 exhibits to motion to compel letter on ESI for accuracy and com w/ LEC re same and re letter brief for filing	Other Motions
3/12/2020	Mark Johnson	0.3	\$1,150	\$345	coms x2 w/ GBW re residency agreement production and issues on mtc joint letter, timing of same	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/13/2020	Guy Wallace	0.3	\$1,350	\$405	com's with Buffaloe; MTJ re Defendants' production of records from database of Residency Agreement, D's portion of joint letter to MJ Beeler re D's failure to produce all Residency Agreements	Other Motions
3/13/2020	Mark Johnson	0.5	\$1,150	\$575	multiple coms w/ James Dion re status of processig residency agreement produxtion and issues re same (.2); emails to OC Jeff K and B Buffaloe re same (.2); email to TMS re downloading issues and direct use of JND	Discovery (Non-Deposition)
3/13/2020	Rachel Steyer	2.3	\$750	\$1,725	Intake w/proposed class member, updated contact info in Sharepoint, created client folder	Class Outreach and Contact
3/13/2020	Rachel Steyer	1.4	\$750	\$1,050	conducting intake, updating sharepoint, creating client folder	Class Outreach and Contact
3/13/2020	Rachel Steyer	0.2	\$750	\$150	brief conversation with scheduled intake, wanted to postpone for following week while continuing to gather docs	Class Outreach and Contact
3/13/2020	Rachel Steyer	2.0	\$750	\$1,500	finished intake w/class member, updated sharepoint and client folder	Class Outreach and Contact
3/15/2020	Guy Wallace	1.3	\$1,350	\$1,755	review and analysis of D's portion of MTC re Residency Agreements; preparation of responsive points and compromise position	Other Motions
3/15/2020	Guy Wallace	0.5	\$1,350	\$675	tc with MTJ re D's portion of MTC re Residency Agreements and response thereto; approach to discovery of PSS and Kronos records	Other Motions
3/15/2020	Guy Wallace	2.4	\$1,350	\$3,240	preparation and drafting of response to D's portion portion of MTC joint letter brief; revise and edit same	Other Motions
3/15/2020	Mark Johnson	0.6	\$1,150	\$690	call w/ GBW re response to Ds section of MTC letter re residency agreements, mtg w/ COC re staffing analysis, document collection strategy for same, complelte v. sampled analysis	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/15/2020	Mark Johnson	0.5	\$1,150	\$575	review and edit revised Plaintiff's section of draft joint letter on MTC residency agreements	Other Motions
3/16/2020	Guy Wallace	0.8	\$1,350	\$1,080	legal research and analysis re issue of whether similar false or misleading statements satisfy commonality standard; Ninth Circuit and district court decisions re same	Class Certification
3/16/2020	Guy Wallace	0.5	\$1,350	\$675	review and analysis of Order from MJ Beeler re PSS and Kronos databases; com's with opposing counsel and MTJ re meet and confer re discovery issues	Discovery (Non-Deposition)
3/16/2020	Mark Johnson	0.4	\$1,150	\$460	draft email to COC BBK re follow up on complaint discovery, analysis of database and complaints; transmission of data	Discovery (Non-Deposition)
3/16/2020	Rachel Steyer	1.8	\$750	\$1,350	intake call w/Todd Barrett, setting up client folder, updating sharepoint	Class Certification
3/16/2020	Rachel Steyer	1.5	\$750	\$1,125	intake call w/proposed class member, updating sharepoint, wrote email, created client folder	Class Outreach and Contact
3/16/2020	Rachel Steyer	1.9	\$750	\$1,425	conducted intake w/proposed class member, updated sharepoint, created client folder	Class Outreach and Contact
3/17/2020	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ; TCC; Waters; Mastin re discovery, expert reports, further motions to compel	Discovery (Non-Deposition)
3/17/2020	Rachel Steyer	0.6	\$750	\$450	conversation with proposed class member--did not conduct intake but explained case & answered questions, set up f/u conversation	Class Outreach and Contact
3/17/2020	Rachel Steyer	1.9	\$750	\$1,425	intake call w/proposed class member, setting up client folder, updating sharepoint	Class Outreach and Contact
3/17/2020	Rachel Steyer	1.0	\$750	\$750	conducted partial intake w/class member, continued to tomorrow, created client folder, updated sharepoint, emailed contact info	Class Outreach and Contact
3/17/2020	Travis Close	0.6	\$850	\$510	conference call w/ GBW, MTJ re: strategy for upcoming discovery, doc review, motions to compel	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/17/2020	Travis Close	1.2	\$850	\$1,020	Begin compiling chart summarizing all meet & confer sessions by issue	Discovery (Non-Deposition)
3/17/2020	Travis Close	1.9	\$850	\$1,615	Begin drafting joint letter brief re: issues of construction documents and operations budgets	Other Motions
3/18/2020	Guy Wallace	0.2	\$1,350	\$270	com's with GG; BU re D's substitution of counsel re Seyfarth Shaw	Case Organization, Planning and Strategy
3/18/2020	Guy Wallace	0.8	\$1,350	\$1,080	com's with MTJ; JGK re D's substitution of counsel re Seyfarth Shaw, implications for discovery, motions to compel, case schedule, settlement	Case Organization, Planning and Strategy
3/18/2020	Guy Wallace	0.2	\$1,350	\$270	com's with Maatman, Seyfarth Shaw re substitution of counsel for O'Melveny and Myers	Communications With Opposing Counsel
3/18/2020	Guy Wallace	0.6	\$1,350	\$810	com's with TMS; MTJ; KGB; TCC re document review and analysis and next steps re same, including analysis of Residency Agreements	Discovery (Non-Deposition)
3/18/2020	Guy Wallace	0.9	\$1,350	\$1,215	com's with Waters; Mastin; MTJ; TCC re analysis and preparation of expert reports re site inspections	Experts (Including Retention)
3/18/2020	Mark Johnson	0.3	\$1,150	\$345	follow-up call w/ GBW, TCC re conference w/ experts, document review, motions to compel	Case Organization, Planning and Strategy
3/18/2020	Mark Johnson	1.0	\$1,150	\$1,150	call w/ GBW re Ds change of counsel, ramifications for discovery; proposed response to invitation for a call, strategy for limiting delays in discovery.	Case Organization, Planning and Strategy
3/18/2020	Mark Johnson	5.0	\$1,150	\$5,750	work on preparing draft responses to RFPs and revising template of response to rogs.	Discovery (Non-Deposition)
3/18/2020	Mark Johnson	0.4	\$1,150	\$460	review JP's email re document review progress and results; coms w/ TCC and GBW re same and draft response to JP describing new doc review assignments	Discovery (Non-Deposition)
3/18/2020	Mark Johnson	0.6	\$1,150	\$690	call w/ Mastin, Waters, GBW, TCC re findings from inspections and standards used, preparation of reports.	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/18/2020	Rachel Steyer	1.2	\$750	\$900	intake call w/proposed class member, updating sharepoint, creating client folder	Class Outreach and Contact
3/18/2020	Rachel Steyer	0.3	\$750	\$225	started intake w/proposed class member but phone about to die so rescheduled	Class Outreach and Contact
3/18/2020	Rachel Steyer	0.7	\$750	\$525	conducted partial intake, created client folder, updated sharepoint, scheduled f/u call	Class Outreach and Contact
3/18/2020	Rachel Steyer	0.2	\$750	\$150	continued intake call, rescheduled to continue	Class Outreach and Contact
3/18/2020	Travis Close	1.7	\$850	\$1,445	Analysis of e-discovery data and reviewing to-date	Discovery (Non-Deposition)
3/18/2020	Travis Close	1.3	\$850	\$1,105	Continue compiling chart analyzing all meet & confers by issue	Discovery (Non-Deposition)
3/18/2020	Travis Close	2.1	\$850	\$1,785	Continue spreadsheet of all meet & confers by issue	Discovery (Non-Deposition)
3/18/2020	Travis Close	0.6	\$850	\$510	Research search terms for important issues for JMP to run searches in Relativity	Discovery (Non-Deposition)
3/18/2020	Travis Close	0.9	\$850	\$765	call w/ experts, MTJ, GBW re: expert reports progress	Experts (Including Retention)
3/19/2020	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re D's change in counsel and follow up with Maatman re telephonic meeting re same and agenda items for such meeting	Case Organization, Planning and Strategy
3/19/2020	Guy Wallace	0.2	\$1,350	\$270	com's with MTJ; RLS; re class cert outreach and declarations	Class Certification
3/19/2020	Guy Wallace	0.6	\$1,350	\$810	tc with MTJ; TCC re motions to compel; document analysis; further written discovery	Discovery (Non-Deposition)
3/19/2020	Guy Wallace	0.9	\$1,350	\$1,215	revise and edit draft MTC from TCC re emergency evacuation policies and procedures; transportation policies and procedures	Other Motions
3/19/2020	Mark Johnson	0.6	\$1,150	\$690	planning call w/ GBW, TCC re motions to compel, discovery, strategy with new counsel, other tasks.	Case Organization, Planning and Strategy
3/19/2020	Mark Johnson	1.6	\$1,150	\$1,840	draft email to new OC outlining pending discovery disputes and attaching relevant documents	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/19/2020	Rachel Steyer	0.9	\$750	\$675	conducted partial intake, rescheduled b/c class member wanted to review his files and records	Class Outreach and Contact
3/19/2020	Rachel Steyer	1.2	\$750	\$900	completed intake call w/Mercy & Denez Batiza, updated sharepoint, sent email w/contact info	Class Outreach and Contact
3/19/2020	Rachel Steyer	0.7	\$750	\$525	answered questions about case w/proposed class member, started to conduct intake, but no real claims/complaints	Class Outreach and Contact
3/19/2020	Rachel Steyer	0.7	\$750	\$525	reviewing incomplete intakes w/notes to determine which class members needed follow up calls	Class Outreach and Contact
3/19/2020	Rachel Steyer	0.9	\$750	\$675	reviewing documents and communications sent by Brookdale class member, adding to file	Discovery (Non-Deposition)
3/19/2020	Travis Close	0.4	\$850	\$340	review correspondence re: new counsel for defendants	Case Organization, Planning and Strategy
3/19/2020	Travis Close	0.4	\$850	\$340	review MTJ's draft email to new opposing counsel re: apprising of discovery issues	Case Organization, Planning and Strategy
3/19/2020	Travis Close	0.7	\$850	\$595	call w/ MTJ and GBW re: strategy for upcoming motions to compel	Case Organization, Planning and Strategy
3/19/2020	Travis Close	2.2	\$850	\$1,870	continue drafting motion to compel (joint letter) re: operating budgets	Other Motions
3/19/2020	Travis Close	0.9	\$850	\$765	continue drafting motion to compel (joint letter) re: operating budgets	Other Motions
3/19/2020	Travis Close	0.9	\$850	\$765	continue drafting motion to compel (joint letter) re: construction history	Other Motions
3/19/2020	Travis Close	1.7	\$850	\$1,445	continue drafting motion to compel (joint letter) re: construction history	Other Motions
3/20/2020	Guy Wallace	0.5	\$1,350	\$675	tc with GG re D's new counsel; motions to compel; case schedule; settlement	Case Organization, Planning and Strategy
3/20/2020	Guy Wallace	0.2	\$1,350	\$270	com's with MTJ; RLS re outreach re class cert declarations	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/20/2020	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re ESI and number of facilities for which Defendants should be required to produce ESI; analysis of documents	Discovery (Non-Deposition)
3/20/2020	Mark Johnson	1.0	\$1,150	\$1,150	revise task list and com w/ COC re same	Case Organization, Planning and Strategy
3/20/2020	Mark Johnson	0.7	\$1,150	\$805	calls (x2) w/ GBW re document review and class outreach	Case Organization, Planning and Strategy
3/20/2020	Mark Johnson	0.3	\$1,150	\$345	emails w. Rachel, Brianda and staff re intakes and declarations, video conference to discuss same	Class Outreach and Contact
3/20/2020	Mark Johnson	0.5	\$1,150	\$575	review sample of intakes prepared by class outreach callers	Class Outreach and Contact
3/20/2020	Mark Johnson	0.2	\$1,150	\$230	email K Stilber re complaint database structure and transfer of same	Discovery (Non-Deposition)
3/20/2020	Mark Johnson	0.1	\$1,150	\$115	coms w/ GCG re deadline for responses to discovery and seeking extension	Discovery (Non-Deposition)
3/20/2020	Mark Johnson	0.1	\$1,150	\$115	coms w/ GBW re vendor for review of residency agreements.	Discovery (Non-Deposition)
3/20/2020	Mark Johnson	0.5	\$1,150	\$575	review sample class cert declartions for call w/ RS, BR re converting intakes from class outreach to declarations	Discovery (Non-Deposition)
3/20/2020	Mark Johnson	1.4	\$1,150	\$1,610	draft email to COC D Marks re docs sought for expert staffing analysis, and questions re same	Experts (Including Retention)
3/20/2020	Rachel Steyer	0.8	\$750	\$600	continued intake w/Connie Bartling, had to reschedule to continue b/c she got tired	Class Outreach and Contact
3/20/2020	Rachel Steyer	1.4	\$750	\$1,050	conducted intake w/proposed class member, created client folder, updated sharepoint, sent email w/contact info	Class Outreach and Contact
3/20/2020	Rachel Steyer	1.5	\$750	\$1,125	conducted intake w/proposed class member, updated sharepoint, created client folder, sent email w/contact info	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/20/2020	Rachel Steyer	0.9	\$750	\$675	reviewing completed/incomplete intakes, editing, trying to follow up w/incomplete intakes	Class Outreach and Contact
3/20/2020	Travis Close	0.4	\$850	\$340	review co-counsel's memo re: new attorneys retained by defendants	Case Organization, Planning and Strategy
3/20/2020	Travis Close	1.5	\$850	\$1,275	continue drafting joint letter / motion to compel re: interrogatories 9 and 10	Other Motions
3/20/2020	Travis Close	0.5	\$850	\$425	continue drafting joint letter / motion to compel re: interrogatories 9 and 10	Other Motions
3/20/2020	Travis Close	0.7	\$850	\$595	continue drafting joint letter re: operating budgets	Other Motions
3/20/2020	Travis Close	1.0	\$850	\$850	continue drafting joint letter / motion to compel re: operating budgets	Other Motions
3/20/2020	Travis Close	0.6	\$850	\$510	continue drafting joint letter re: operating budgets	Other Motions
3/20/2020	Travis Close	1.3	\$850	\$1,105	continue drafting joint letter re: operating budgets (finalize draft 1)	Other Motions
3/21/2020	Rachel Steyer	1.2	\$750	\$900	conducted intake w/class member, created client folder, updated sharepoint	Class Outreach and Contact
3/23/2020	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of Ninth Circuit decision in Walker re class certification of claims re false or misleading statements, and ability of district court to modify class definition to limit proposed class to putative class members who reviewed documents containing same; com's with MTJ re same (.2)	Class Certification
3/23/2020	Mark Johnson	0.8	\$1,150	\$920	review and analyze new authority from 9th circuit on class cert in UCL case (Walker v. LSW); com w/ GBW re same (.1)	Class Certification
3/23/2020	Mark Johnson	0.1	\$1,150	\$115	email Rachel Steyer, Briand Rodriguez re meeting to discuss status of class outreach, declarations	Class Outreach and Contact
3/23/2020	Mark Johnson	0.4	\$1,150	\$460	review examples of PSS docs and SmartCare docs identified by doc reviewer J Proctor	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/23/2020	Mark Johnson	0.4	\$1,150	\$460	review documents produced describing SmartCare system and PSS from Justin P	Discovery (Non-Deposition)
3/23/2020	Mark Johnson	0.2	\$1,150	\$230	review and respond to email from RAB re potential third party reviewer for residency agreements; review website for firm for same	Discovery (Non-Deposition)
3/23/2020	Mark Johnson	0.3	\$1,150	\$345	coms w GBW re claim form and notice	Settlement
3/23/2020	Rachel Steyer	1.8	\$750	\$1,350	conducted intake w/proposed class member, updated sharepoint, created client folder	Class Outreach and Contact
3/23/2020	Rachel Steyer	0.2	\$750	\$150	sending email to proposed class member to provide more information about the case	Class Outreach and Contact
3/23/2020	Rachel Steyer	1.6	\$750	\$1,200	intake w/proposed class member, updating sharepoint, creating client folder, sent f/u email w/contact info	Class Outreach and Contact
3/23/2020	Rachel Steyer	1.1	\$750	\$825	continued intake with Connie Bartling, scheduled follow up to discuss possibility of declaration	Class Outreach and Contact
3/23/2020	Rachel Steyer	1.6	\$750	\$1,200	conducted intake call w/proposed class member	Class Outreach and Contact
3/23/2020	Rachel Steyer	0.7	\$750	\$525	conducted partial intake w/proposed client, had to stop due to terminal server shut down, attempted call back	Class Outreach and Contact
3/23/2020	Travis Close	1.1	\$850	\$935	targeted doc review — (overtime or OT) w/10 control* — # BKD0192803-BKD0315666 (1-14 of 14)	Discovery (Non-Deposition)
3/23/2020	Travis Close	1.1	\$850	\$935	Legal research re: relevance of company budgets in discovery	Discovery (Non-Deposition)
3/23/2020	Travis Close	0.9	\$850	\$765	research law on relevance of construction and alteration dates for discovery in ADA cases	Discovery (Non-Deposition)
3/23/2020	Travis Close	1.1	\$850	\$935	continue drafting motion to compel re: construction/alteration dates (case citations)	Other Motions
3/23/2020	Travis Close	1.3	\$850	\$1,105	continue drafting motion to compel re: operating budgets (case citations)	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/24/2020	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ re meet and confer with D's new counsel (Seyfarth Shaw); class outreach; document review and analysis re Residency Agreements, PEAR	Case Organization, Planning and Strategy
3/24/2020	Guy Wallace	0.5	\$1,350	\$675	com's with GG; MTJ; BU re D's new counsel and issues re same, schedule and motions to compel	Case Organization, Planning and Strategy
3/24/2020	Guy Wallace	0.6	\$1,350	\$810	tc with MTJ; TCC; RLS; BCR re class outreach and preparation of class member declarations	Class Certification
3/24/2020	Guy Wallace	0.9	\$1,350	\$1,215	tc with Maatman; Riley; Goodin; GG; MTJ re D's change in counsel; COVID-19 and impact on schedule; pending MTC's and discovery issues and meet and confer re same	Communications With Opposing Counsel
3/24/2020	Mark Johnson	0.3	\$1,150	\$345	pre-call w/ GCG, GBW for strategy for first call with new OC and position on discovery disputes	Case Organization, Planning and Strategy
3/24/2020	Mark Johnson	0.4	\$1,150	\$460	coms x2 w/ GBW re strategy for call w/ OC re motions to compel, schedule and class declarations,	Case Organization, Planning and Strategy
3/24/2020	Mark Johnson	0.6	\$1,150	\$690	conference call w/ GBW, Brianda R, Rachel S re progress on class outreach, intakes, preparation of draft class cert declarations.	Class Outreach and Contact
3/24/2020	Mark Johnson	1.0	\$1,150	\$1,150	review class outreach intakes for call w/ RS, BR, GBW	Class Outreach and Contact
3/24/2020	Mark Johnson	0.3	\$1,150	\$345	review accuity docs from JP produced by Defendants; email exchange re same	Discovery (Non-Deposition)
3/24/2020	Mark Johnson	1.1	\$1,150	\$1,265	meet and confer call w/ OC GM, JR, MG and COC GG, GBW, TCC re status of Seyfarth's assumptoin of case, pending discovery issues including ESI, PSS/Kronos data, # persons with disabilities, Residency agreements, evacuation and transportation policies, operatng budgets, etc.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/24/2020	Mark Johnson	0.3	\$1,150	\$345	follow up call with GCG, GBW re results of call w/ new OC, ramifications of positions taken and next steps	Discovery (Non-Deposition)
3/24/2020	Mark Johnson	1.8	\$1,150	\$2,070	revised draft Ps section of joint letter brief on operating budgets; research prior correspondence and other documents for same	Other Motions
3/24/2020	Rachel Steyer	0.6	\$750	\$450	call w/GBW, BCR, MTJ, and Travis re Brookdale outreach	Case Organization, Planning and Strategy
3/24/2020	Rachel Steyer	1.7	\$750	\$1,275	conducted intake, created client folder, updated sharepoint, sent email w/contact info	Class Outreach and Contact
3/24/2020	Rachel Steyer	1.4	\$750	\$1,050	intake w/proposed class member, creating client folder, updating sharepoint	Class Outreach and Contact
3/24/2020	Travis Close	0.2	\$850	\$170	review MTJ's updated task list	Case Organization, Planning and Strategy
3/24/2020	Travis Close	0.3	\$850	\$255	Team meeting discussing strategy before call with new OC	Case Organization, Planning and Strategy
3/24/2020	Travis Close	0.6	\$850	\$510	team meeting re: class outreach efforts and next steps	Class Outreach and Contact
3/24/2020	Travis Close	0.7	\$850	\$595	research depositions by remote means	Depositions
3/24/2020	Travis Close	1.0	\$850	\$850	Targeted doc review — overtime w/10 ((staffing or staffed or labor or expense! or COC or care or analy!) — # BKD0106277-BKD0146643 (1-14 of 180)	Discovery (Non-Deposition)
3/24/2020	Travis Close	1.0	\$850	\$850	Targeted doc review — overtime w/10 ((staffing or staffed or labor or expense! or COC or care or analy!) — # BKD0146643-BKD0161638 (14-43 of 180)	Discovery (Non-Deposition)
3/24/2020	Travis Close	0.8	\$850	\$680	Continue researching facility EDs and other executives (Elk Grove)	Discovery (Non-Deposition)
3/24/2020	Travis Close	0.5	\$850	\$425	Continue researching facility EDs and other executives (Elk Grove)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/24/2020	Travis Close	1.5	\$850	\$1,275	Continue researching facility EDs and other executives (Elk Grove, Folsom)	Discovery (Non-Deposition)
3/24/2020	Travis Close	1.0	\$850	\$850	call with new opposing counsel re: orientation and outstanding discovery	Discovery (Non-Deposition)
3/24/2020	Travis Close	0.2	\$850	\$170	review MTJ'S edits to operating budgets motion to compel	Other Motions
3/25/2020	Guy Wallace	1.8	\$1,350	\$2,430	legal research and analysis re successor liability for subsequent owners and/or operators of newly constructed or altered facilities	Misc. Research
3/25/2020	Guy Wallace	0.3	\$1,350	\$405	tc with JRA re successor liability for subsequent owners and/or operators of newly constructed or altered facilities	Misc. Research
3/25/2020	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ re successor liability for subsequent owners and/or operators of newly constructed or altered facilities	Misc. Research
3/25/2020	Mark Johnson	0.2	\$1,150	\$230	comw w/ C Tsai and staff re availability of subset of subpoenaed documents from DSS, transfer protoco	Discovery (Non-Deposition)
3/25/2020	Mark Johnson	0.2	\$1,150	\$230	email exchanges (x2) with Justin P. re direction for targeted search/review of documents and analysis and results of same and other progress on document review	Discovery (Non-Deposition)
3/25/2020	Mark Johnson	4.5	\$1,150	\$5,175	revise draft motion to compel letter re rogs 9 and 10 seeking new constructon / altered facilites, including rfesearch of relevant law and review of meet and onfer history	Other Motions
3/25/2020	Mark Johnson	2.7	\$1,150	\$3,105	legal research re successor liability for new construction violations; begin drafting memo re same	Other Motions
3/25/2020	Mark Johnson	1.3	\$1,150	\$1,495	coms x3 w. GBW re case law and analysis of successor liability for new construxtion iolations	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/25/2020	Rachel Steyer	1.0	\$750	\$750	reviewing model declarations, comparing to completed intakes, beginning to draft declarations	Class Certification
3/25/2020	Rachel Steyer	1.7	\$750	\$1,275	intake call w/proposed class member, creating client folder, updating sharepoint, sending email w/contact info	Class Outreach and Contact
3/25/2020	Rachel Steyer	0.3	\$750	\$225	conducted partial intake, created client folder, updated sharepoint	Class Outreach and Contact
3/25/2020	Travis Close	0.7	\$850	\$595	Targeted doc review — (overtime or OT) w/20 (various) — # BKD0113408-BKD0153569 (8-29 of 360)	Discovery (Non-Deposition)
3/25/2020	Travis Close	1.4	\$850	\$1,190	Continue analyzing records to determine executives at each facility (Fountaingrove, Garden Grove)	Discovery (Non-Deposition)
3/25/2020	Travis Close	1.1	\$850	\$935	Continue analyzing records to determine executives at each facility (Grand Terrace, Irvine)	Discovery (Non-Deposition)
3/25/2020	Travis Close	0.2	\$850	\$170	Review MTJ's edits of motion to compel dates of construction/alteration	Other Motions
3/26/2020	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re discovery and email com's from Maatman re D's need for additional time re responses to pending meet and confer issues and MTC's	Discovery (Non-Deposition)
3/26/2020	Mark Johnson	0.2	\$1,150	\$230	email exchanges w. staff re class outreach status, depos	Case Organization, Planning and Strategy
3/26/2020	Mark Johnson	0.1	\$1,150	\$115	review email from oc re status of communications w/ client and former counsel, proposed postponement of meeting; confer w/ GBW re same	Discovery (Non-Deposition)
3/26/2020	Mark Johnson	5.5	\$1,150	\$6,325	work on draft responses to RFPs	Discovery (Non-Deposition)
3/26/2020	Rachel Steyer	0.5	\$750	\$375	conversation with BCR to review declaration drafting	Class Certification
3/26/2020	Rachel Steyer	5.3	\$750	\$3,975	reviewing and analyzing model declarations, reviewing and analyzing intakes, drafting declarations	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/26/2020	Rachel Steyer	0.3	\$750	\$225	follow up conversation with proposed class member, scheduled intake, answered questions, created client folder and filed in initial intake	Class Outreach and Contact
3/26/2020	Rachel Steyer	1.2	\$750	\$900	conducted intake with proposed class member, updated sharepoint	Class Outreach and Contact
3/26/2020	Rachel Steyer	0.2	\$750	\$150	finished intake with class member	Class Outreach and Contact
3/26/2020	Rachel Steyer	0.7	\$750	\$525	partial intake conducted, updated sharepoint	Class Outreach and Contact
3/26/2020	Travis Close	1.2	\$850	\$1,020	Eidler - Continue analyzing records to determine executives at each facility (Kettleman Lane)	Case Organization, Planning and Strategy
3/26/2020	Travis Close	1.0	\$850	\$850	Continue analyzing records to determine executives at each facility (Lodi, Loma Linda)	Case Organization, Planning and Strategy
3/26/2020	Travis Close	1.3	\$850	\$1,105	continue analyzing records to determine executives at each facility (Magnolia, Mirage Inn)	Case Organization, Planning and Strategy
3/26/2020	Travis Close	0.5	\$850	\$425	Review new project/assignment for LEC and research definition of alteration under ADA	Case Organization, Planning and Strategy
3/26/2020	Travis Close	1.3	\$850	\$1,105	continue analyzing records to determine executives at each facility (Monrovia, Murrieta)	Case Organization, Planning and Strategy
3/26/2020	Travis Close	1.0	\$850	\$850	continue analyzing records to determine executives at each facility (Napa)	Case Organization, Planning and Strategy
3/26/2020	Travis Close	0.7	\$850	\$595	continue analyzing records to determine executives at each facility (North Euclid)	Case Organization, Planning and Strategy
3/27/2020	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ; RLS re preparation of draft class cert declarations from putative class members	Class Certification
3/27/2020	Mark Johnson	0.5	\$1,150	\$575	call w/ Rachel S., Brianda R, TCC re class outreach and preparation of declartions, revisions to intake re	Class Outreach and Contact
3/27/2020	Mark Johnson	2.8	\$1,150	\$3,220	continue working on draft responses to RFPs served on Plaintiffs	Discovery (Non-Deposition)
3/27/2020	Mark Johnson	0.1	\$1,150	\$115	review JP memo re results of document coding	Discovery (Non-Deposition)
3/27/2020	Rachel Steyer	0.2	\$750	\$150	discussion w/BCR updating status re declaration drafting in anticipation of meeting	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/27/2020	Rachel Steyer	0.5	\$750	\$375	phone call with TC, BCR, and MTJ to discuss declaration drafting process	Class Certification
3/27/2020	Rachel Steyer	5.1	\$750	\$3,825	drafting declarations, reviewing intakes and model declarations	Class Certification
3/27/2020	Rachel Steyer	0.2	\$750	\$150	email to GBW, MTJ, TC, and BCR w/draft declarations for edit and update on declaration drafting process	Class Certification
3/27/2020	Rachel Steyer	1.7	\$750	\$1,275	editing BCR's draft declaration, wrote email outlining changes that need to be incorporated	Class Certification
3/29/2020	Rachel Steyer	2.0	\$750	\$1,500	drafting declaration, email to GBW	Class Certification
3/30/2020	Mark Johnson	0.1	\$1,150	\$115	review J Proctor memo reporting on targeted document review.	Discovery (Non-Deposition)
3/30/2020	Mark Johnson	2.8	\$1,150	\$3,220	continue drafting and finalize draft responses to RFP for Stiner / template	Discovery (Non-Deposition)
3/30/2020	Rachel Steyer	6.3	\$750	\$4,725	editing and reviewing intakes to determine best declaration candidates, revising declarations, drafting declarations	Class Certification
3/30/2020	Rachel Steyer	0.8	\$750	\$600	scheduling intake calls, updating sharepoint, limited outreach to potential good declarant candidates, following up via emails for document requests	Class Outreach and Contact
3/30/2020	Travis Close	1.0	\$850	\$850	Targeted doc review — (overtime or OT) w/20 (various) — # BKD0227995-BKD0241333 (88-107 of 360)	Discovery (Non-Deposition)
3/30/2020	Travis Close	0.8	\$850	\$680	Targeted doc review — (overtime or OT) w/20 (various) — # BKD0241333-BKD0264942 (107-122 of 360)	Discovery (Non-Deposition)
3/30/2020	Travis Close	0.3	\$850	\$255	analyze request for extension to respond to subpoena by Riverside DSS	Discovery (Non-Deposition)
3/31/2020	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re next steps, proposed communication w/ OC re expectations on discovery.	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/1/2020	Mark Johnson	1.0	\$1,150	\$1,150	draft email to OC re delays in discovery and meeting and conferrng; availavblity and expectations for next call, inmluding list of docs and informaiton to be produced; review prior correspondence and letter briefs re same	Discovery (Non-Deposition)
4/1/2020	Mark Johnson	0.3	\$1,150	\$345	email exchanges w/ SCC re responses to D's discovery requests; sourxe of faxts allefed in complaint, revisions to draft responses	Discovery (Non-Deposition)
4/1/2020	Mark Johnson	0.4	\$1,150	\$460	finalize emal re outsanding discovery issues, revise and finalized 3 draft MTC letters for inclusion with emails	Discovery (Non-Deposition)
4/1/2020	Rachel Steyer	3.2	\$750	\$2,400	reviewing and analyzing intakes for declarations, drafting and editing declarations	Class Certification
4/1/2020	Rachel Steyer	1.0	\$750	\$750	continued intake call w/Shakti Butler, updating sharepoint	Class Outreach and Contact
4/1/2020	Rachel Steyer	0.2	\$750	\$150	started intake with class member, but she wanted to postpone in order to review her files and discuss with her sister, rescheduled for friday	Class Outreach and Contact
4/1/2020	Rachel Steyer	3.1	\$750	\$2,325	attempted class outreach, leaving VMs, scheduling intakes, sending emails	Class Outreach and Contact
4/1/2020	Travis Close	0.7	\$850	\$595	review co-counsel's edits to draft interrogatories	Discovery (Non-Deposition)
4/1/2020	Travis Close	1.2	\$850	\$1,020	Targeted doc review — (overtime or OT) w/20 (various) — # BKD0264942-BKD0286894 (122-164 of 360)	Discovery (Non-Deposition)
4/1/2020	Travis Close	0.4	\$850	\$340	edits to MTJ's draft email to opposing counsel re: motions to compel	Other Motions
4/2/2020	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ re meet and confer with Maatman; schedule and agenda for same	Discovery (Non-Deposition)
4/2/2020	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW re plan for call with OC re discovery, call with team re declarations, approache to discovery meet and confer and motions going forward.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/2/2020	Mark Johnson	0.1	\$1,150	\$115	review notes from prior call with OC re Kronos data and email exchange w/ COC BU re availabiltiy of certain data fields	Discovery (Non-Deposition)
4/2/2020	Mark Johnson	0.3	\$1,150	\$345	draft description of residency agreement review projecet for presentation to vendor	Discovery (Non-Deposition)
4/2/2020	Mark Johnson	0.3	\$1,150	\$345	email exchanges (x3) w/ RAB re search for vendors to review residency agreements, upload of DSS documents	Discovery (Non-Deposition)
4/2/2020	Rachel Steyer	4.5	\$750	\$3,375	drafting, revising, editing delcarations, reviewing intakes	Class Certification
4/2/2020	Rachel Steyer	0.6	\$750	\$450	conducted partial intake with proposed class member, creating client folder, updating sharepoint, scheduling f/u call	Class Outreach and Contact
4/2/2020	Travis Close	1.1	\$850	\$935	Targeted doc review — (overtime or OT) w/20 (various) — # BKD0286894-BKD0298667 (164-195 of 360)	Discovery (Non-Deposition)
4/2/2020	Travis Close	1.2	\$850	\$1,020	analyze/update status of DSS subpoenas received and not received	Discovery (Non-Deposition)
4/2/2020	Travis Close	0.7	\$850	\$595	analyze/update status of building records subpoenas received and not received	Discovery (Non-Deposition)
4/2/2020	Travis Close	0.8	\$850	\$680	continue analyzing/updating status of building records subpoenas received and not received	Discovery (Non-Deposition)
4/3/2020	Guy Wallace	0.7	\$1,350	\$945	com's with TMS; MTJ; RLS; BCR re class outreach efforts and preparation of class cert declarations	Class Certification
4/3/2020	Mark Johnson	0.6	\$1,150	\$690	weekly call with Brianda Rodriquez and Rachel Steyer re progress on class outreache and collecting information for class cert declarations, drafting same	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/3/2020	Mark Johnson	1.0	\$1,150	\$1,150	call with David Marks re status of discovery of data and documents needed for expert staffing analysis and format of same; knowledge thus far re availability of data, PSS system ,Kronos issues	Discovery (Non-Deposition)
4/3/2020	Rachel Steyer	0.2	\$750	\$150	discussion with BCR to review status of declaration drafting	Class Certification
4/3/2020	Rachel Steyer	2.1	\$750	\$1,575	continuing declaration drafting	Class Certification
4/3/2020	Rachel Steyer	2.1	\$750	\$1,575	completed intake w/class member, updated sharepoint, sent email	Class Outreach and Contact
4/3/2020	Rachel Steyer	1.2	\$750	\$900	conducted partial intake with class member, updated sharepoint, scheduled follow up call	Class Outreach and Contact
4/3/2020	Rachel Steyer	1.5	\$750	\$1,125	conducted intake with class member, updated sharepoint	Class Outreach and Contact
4/3/2020	Rachel Steyer	0.6	\$750	\$450	conference call w/BCR, MTJ, GBW to discuss declaration drafting status	Class Outreach and Contact
4/3/2020	Rachel Steyer	0.6	\$750	\$450	reading and reviewing documents class member provided, creating client doc folder, updating intake form w/new information	Misc. Research
4/3/2020	Travis Close	0.9	\$850	\$765	continue investigation into executives/management for each brookdale facility during class period (Paulin Creek)	Case Organization, Planning and Strategy
4/3/2020	Travis Close	1.2	\$850	\$1,020	Targeted doc review — (overtime or OT) w/20 (various) — # BKD0298667-BKD0326821 (195-219 of 360)	Discovery (Non-Deposition)
4/3/2020	Travis Close	0.9	\$850	\$765	continue investigation into executives/management for each brookdale facility during class period (N. Tarzana)	Discovery (Non-Deposition)
4/3/2020	Travis Close	0.5	\$850	\$425	continue investigation into executives/management for each brookdale facility during class period (N. Tarzana)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/3/2020	Travis Close	1.2	\$850	\$1,020	continue investigation into executives/management for each brookdale facility during class period (Northridge, Oceanside)	Discovery (Non-Deposition)
4/3/2020	Travis Close	0.5	\$850	\$425	continue investigation into executives/management for each brookdale facility during class period (Orangevale)	Discovery (Non-Deposition)
4/3/2020	Travis Close	1.0	\$850	\$850	continue investigation into executives/management for each brookdale facility during class period (Orangevale)	Discovery (Non-Deposition)
4/4/2020	Mark Johnson	0.1	\$1,150	\$115	com w/ D Marks re identificatiom of facilitiews at issue,	Discovery (Non-Deposition)
4/6/2020	Guy Wallace	0.2	\$1,350	\$270	review and analysis of MTJ agenda for meet and confer with D"s re discovery disputes and issues	Discovery (Non-Deposition)
4/6/2020	Mark Johnson	0.1	\$1,150	\$115	email to OC re furhter meet and confer call on Tuesday	Discovery (Non-Deposition)
4/6/2020	Mark Johnson	1.5	\$1,150	\$1,725	prepare annotated agenda for call w/ OC re diiscovery / MC and ciirculate to COC	Discovery (Non-Deposition)
4/6/2020	Mark Johnson	0.2	\$1,150	\$230	email exchange w/ COC BU and DM re docs needed for staffing analysis, PEAR and Kronos data	Discovery (Non-Deposition)
4/6/2020	Rachel Steyer	0.9	\$750	\$675	editing BCR draft declaration, sending email to her discussing revisions	Class Certification
4/6/2020	Rachel Steyer	0.4	\$750	\$300	second round of edits on draft declaration for BCR, email circulating draft to BCR, GBW, and MTJ	Class Certification
4/6/2020	Rachel Steyer	2.9	\$750	\$2,175	declaration drafting, circulating to GBW and MTJ	Class Certification
4/6/2020	Rachel Steyer	1.8	\$750	\$1,350	follow up call to complete intake, updated sharepoint, sent email to procure documents from client	Class Outreach and Contact
4/6/2020	Rachel Steyer	2.5	\$750	\$1,875	conducted intake with proposed class member, updated sharepoint, created client folder, sent email w/contact info	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/6/2020	Travis Close	0.2	\$850	\$170	review MTJ's draft agenda for tomorrow's m&c with opposing counsel	Case Organization, Planning and Strategy
4/6/2020	Travis Close	1.0	\$850	\$850	Targeted doc review — (overtime or OT) w/20 (various) — # BBKD0326821-BKD0338999 (219-245 of 360)	Discovery (Non-Deposition)
4/6/2020	Travis Close	0.2	\$850	\$170	Review edits to draft ROGs by SSC	Discovery (Non-Deposition)
4/6/2020	Travis Close	0.1	\$850	\$85	Email to Titan re: records received from City of Tracy	Discovery (Non-Deposition)
4/7/2020	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re meet and confer with D's and results thereof	Discovery (Non-Deposition)
4/7/2020	Mark Johnson	1.8	\$1,150	\$2,070	telephonic meet and confer w/ OC (5) re 14 separate outstanding disputes	Discovery (Non-Deposition)
4/7/2020	Mark Johnson	0.7	\$1,150	\$805	calls (x3) with GBW re results of meet and confer session, next steps with defendants, deadlines, document review status, including review of City construction related documents.	Discovery (Non-Deposition)
4/7/2020	Mark Johnson	0.3	\$1,150	\$345	email exchanges w/ doc reviewers JP, EO re status of doc review, progress reports and shift in focus	Discovery (Non-Deposition)
4/7/2020	Rachel Steyer	2.7	\$750	\$2,025	declaration drafting and editing	Class Certification
4/7/2020	Rachel Steyer	3.5	\$750	\$2,625	conducting intake call with proposed class member (had to split up before outreach team meeting), editing intake, creating client folder, updating sharepoint	Class Outreach and Contact
4/7/2020	Rachel Steyer	0.2	\$750	\$150	attempted phone call w/class member, left VM; separately double checked sharepoint for info re potential class member as learned from earlier intake call	Class Outreach and Contact
4/7/2020	Travis Close	0.5	\$850	\$425	Investigation into management/executives at each facility (Paulin Creek)	Case Organization, Planning and Strategy
4/7/2020	Travis Close	1.1	\$850	\$935	Investigation into management/executives at each facility (Rancho Mirage, Red Bluff)	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/7/2020	Travis Close	0.3	\$850	\$255	Eidler - begin investigation into owner Blackstone of brookdale facilities	Case Organization, Planning and Strategy
4/7/2020	Travis Close	1.0	\$850	\$850	Targeted doc review — (overtime or OT) w/20 (various) — # BKD0338999-BKD0354139 (245-262 of 360)	Discovery (Non-Deposition)
4/7/2020	Travis Close	1.8	\$850	\$1,530	call with MTJ, GG, BBK, and opposing counsel re: discovery issues	Discovery (Non-Deposition)
4/8/2020	Mark Johnson	0.2	\$1,150	\$230	review results of LEC review of City permit documents; email exchange w/ TCC re re-allocation of doc review and other project assignments.	Case Organization, Planning and Strategy
4/8/2020	Mark Johnson	0.1	\$1,150	\$115	follow-up email exchange w/ Justin Proctor re document review assignment	Discovery (Non-Deposition)
4/8/2020	Mark Johnson	3.5	\$1,150	\$4,025	review proposed edits from SCC and BBK to reponse to rogs and RFPs; revise and edit same.	Discovery (Non-Deposition)
4/8/2020	Mark Johnson	0.2	\$1,150	\$230	email to COC re revised draft responses to rogs and RFPs, next steps for addressing remaining issues and scheduling call to disxuss	Discovery (Non-Deposition)
4/8/2020	Mark Johnson	0.1	\$1,150	\$115	review and respond to email from OC Jaxobson re joont discovery letters, meet and confer proxess, meeting on 4/14	Discovery (Non-Deposition)
4/8/2020	Mark Johnson	0.1	\$1,150	\$115	emails (x2) w/ Titan Legal Services and deputy AG Carol Tsai re produxtion proxess and status for DSS subopenas.	Discovery (Non-Deposition)
4/8/2020	Travis Close	1.4	\$850	\$1,190	conference call with Heretik re: vendor demo for residency agreement processing	Case Organization, Planning and Strategy
4/8/2020	Travis Close	0.6	\$850	\$510	Investigation into management/executives at each facility (Redwood City)	Case Organization, Planning and Strategy
4/8/2020	Travis Close	0.7	\$850	\$595	investigation into management/executives at each facility (Riverside)	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/8/2020	Travis Close	0.3	\$850	\$255	email to MTJ re: reapportioning assignments for staff attorneys & paralegals	Case Organization, Planning and Strategy
4/8/2020	Travis Close	1.2	\$850	\$1,020	Targeted doc review — (overtime or OT) w/20 (various) — # BKD0354139-BKD0543270 (262-294 of 360)	Discovery (Non-Deposition)
4/8/2020	Travis Close	0.3	\$850	\$255	review JMP's analysis of doc review using targeted search terms	Discovery (Non-Deposition)
4/8/2020	Travis Close	0.3	\$850	\$255	review D's draft joint letter brief portions for emergency evacuation & residency agreement issues	Pleadings and Motions Re: Pleadings
4/9/2020	Travis Close	1.2	\$850	\$1,020	Investigation into management/executives at each facility (Riverwalk, Roseville)	Case Organization, Planning and Strategy
4/9/2020	Travis Close	1.1	\$850	\$935	Targeted doc review — budget w/20 (various) — # BKD0106139-BKD0237011 (1-15 of 32)	Discovery (Non-Deposition)
4/9/2020	Travis Close	1.0	\$850	\$850	Targeted doc review — budget w/20 (various) — # BKD0106139-BKD0347536(15-32 of 32)	Discovery (Non-Deposition)
4/9/2020	Travis Close	0.3	\$850	\$255	Email to Titan re: extension request from city of Windsor re: building records subpoenas	Discovery (Non-Deposition)
4/10/2020	Guy Wallace	1.1	\$1,350	\$1,485	legal research and analysis re recent decisions re CLRA and class certification, including claims re latent defects that have not yet manifested and caused injury but impose a risk of injury	Class Certification
4/10/2020	Rachel Steyer	0.2	\$750	\$150	conversation with BCR re declaration drafting	Class Outreach and Contact
4/10/2020	Travis Close	1.0	\$850	\$850	Investigation into management/executives at each facility (San Dimas)	Case Organization, Planning and Strategy
4/10/2020	Travis Close	0.8	\$850	\$680	Draft instructions for LEC to take over facility ED/other managers investigation assignment	Case Organization, Planning and Strategy
4/10/2020	Travis Close	1.2	\$850	\$1,020	update cast of characters (formatting, info from complaint database)	Case Organization, Planning and Strategy
4/10/2020	Travis Close	0.9	\$850	\$765	Investigation into management/executives at each facility (Salinas)	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/10/2020	Travis Close	1.0	\$850	\$850	Targeted doc review — district director of operations (various) — # BKD0138673-BKD0153674 (1-18 of 340)	Discovery (Non-Deposition)
4/10/2020	Travis Close	1.0	\$850	\$850	Targeted doc review — district director of operations (various) — # BKD0153674-BKD0173564 (18-45 of 340)	Discovery (Non-Deposition)
4/12/2020	Mark Johnson	1.3	\$1,150	\$1,495	continue review of draft responses to rogs and preparing issue list for conference call re same	Discovery (Non-Deposition)
4/12/2020	Mark Johnson	0.7	\$1,150	\$805	review cost spreadsheet from Gwen and make modifications for consolidation of three firms' costs; review prior motions to identify categorization of costs.	Other Motions
4/13/2020	Guy Wallace	0.5	\$1,350	\$675	tc with MTJ; RLS; BCR re class outreach and preparation of draft declarations of putative class members	Class Certification
4/13/2020	Mark Johnson	0.7	\$1,150	\$805	call w/ GBW, Rachel Steyer and Brianda Rodriguez re status of outreach efforts, declarations, from potential class members and their representatives	Class Certification
4/13/2020	Mark Johnson	0.9	\$1,150	\$1,035	review draft declarations from proposed class members	Class Certification
4/13/2020	Mark Johnson	1.8	\$1,150	\$2,070	call w/ BBK, SSC and B Umpierre to review and discuss strategy on D's rogs to individual plaintiffs draft responses	Discovery (Non-Deposition)
4/13/2020	Rachel Steyer	0.4	\$750	\$300	editing BCR draft declaration, sending email	Class Certification
4/13/2020	Rachel Steyer	0.3	\$750	\$225	setting up intake, updating her about case, discussing sending documents	Class Outreach and Contact
4/13/2020	Rachel Steyer	0.7	\$750	\$525	conference call w/BCR, GBW, and MTJ to discuss Brookdale outreach and declaration drafting	Class Outreach and Contact
4/13/2020	Travis Close	1.0	\$850	\$850	Continue updating cast of characters (from complaint database)	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/13/2020	Travis Close	0.4	\$850	\$340	Continue updating cast of characters (from complaint database)	Case Organization, Planning and Strategy
4/13/2020	Travis Close	1.1	\$850	\$935	Continue updating cast of characters (from master facility spreadsheet)	Case Organization, Planning and Strategy
4/13/2020	Travis Close	0.6	\$850	\$510	Investigation into management/executives at each facility (San Jose)	Case Organization, Planning and Strategy
4/13/2020	Travis Close	0.9	\$850	\$765	Investigation into management/executives at each facility (San Juan Capistrano)	Case Organization, Planning and Strategy
4/13/2020	Travis Close	0.6	\$850	\$510	Investigation into management/executives at each facility (San Marcos	Case Organization, Planning and Strategy
4/13/2020	Travis Close	1.1	\$850	\$935	begin investigation into owners/manages of facilities (Relativity/DSS license research)	Case Organization, Planning and Strategy
4/13/2020	Travis Close	1.0	\$850	\$850	Continue investigation into owners/manages of facilities (Relativity/DSS license research)	Case Organization, Planning and Strategy
4/13/2020	Travis Close	1.0	\$850	\$850	Targeted doc review — district director of operations (various) — # BKD0173564-BKD0190066 (45-75 of 340)	Discovery (Non-Deposition)
4/13/2020	Travis Close	0.4	\$850	\$340	Review and analyze memo from co-counsel re: discoverability of social media info	Discovery (Non-Deposition)
4/14/2020	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ re meet and confer with D's re various discovery issues	Discovery (Non-Deposition)
4/14/2020	Mark Johnson	1.5	\$1,150	\$1,725	telephonic meet and confer w/ OC Maatman and team re status of discovery efforts on multiple categories of document requests	Discovery (Non-Deposition)
4/14/2020	Mark Johnson	0.4	\$1,150	\$460	prep for discovery MC conference w/ OC re multiple categories of document requests	Discovery (Non-Deposition)
4/14/2020	Rachel Steyer	0.9	\$750	\$675	finishing Lisa Bell declaration	Class Certification
4/14/2020	Rachel Steyer	1.9	\$750	\$1,425	intake w/sister of Paula Bruni, possible declarant, discussion re power of attorney, updating contact info	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/14/2020	Rachel Steyer	0.2	\$750	\$150	email to TB updating him re outreach and declaration drafting status and progress	Class Outreach and Contact
4/14/2020	Rachel Steyer	0.8	\$750	\$600	reviewing emails from Patricia Lewis prior to outreach/intake call	Class Outreach and Contact
4/14/2020	Rachel Steyer	3.7	\$750	\$2,775	prepared excel spreadsheet to track location of Brookdale facilities of intakes already conducted/in progress, circulated email to Brookdale team, sent emails to BCR requesting clarifications and updates to her intakes/info	Class Outreach and Contact
4/14/2020	Travis Close	0.9	\$850	\$765	analysis of residency agreements to estimate total number of agreements v. addenda and other material	Case Organization, Planning and Strategy
4/14/2020	Travis Close	0.5	\$850	\$425	Continue investigation into owners/manages of facilities (Relativity/DSS license research)	Case Organization, Planning and Strategy
4/14/2020	Travis Close	1.0	\$850	\$850	Continue investigation into owners/manages of facilities (search: BRE w/10 LLC)	Case Organization, Planning and Strategy
4/14/2020	Travis Close	0.5	\$850	\$425	Continue investigation into owners/manages of facilities (search: BKD RIDEA)	Case Organization, Planning and Strategy
4/14/2020	Travis Close	1.5	\$850	\$1,275	meet and confer call with MTJ, BBK, & opposing counsel re: outstanding discovery issues	Case Organization, Planning and Strategy
4/14/2020	Travis Close	0.4	\$850	\$340	Continue investigation into owners/manages of facilities (search: BKD RIDEA)	Case Organization, Planning and Strategy
4/14/2020	Travis Close	1.2	\$850	\$1,020	Continue investigation into owners/manages of facilities (search: BKD Twenty-One Management, Inc.)	Case Organization, Planning and Strategy
4/14/2020	Travis Close	0.7	\$850	\$595	Continue investigation into owners/manages of facilities (search: HCP AUR1)	Case Organization, Planning and Strategy
4/14/2020	Travis Close	1.0	\$850	\$850	Targeted doc review — district director of operations (various) — # BKD0190066-BKD0197174 (75-107 of 340)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/15/2020	Mark Johnson	1.7	\$1,150	\$1,955	Draft memo to file / staff identifying on-going and new document review and analysis projects with directions for same; review of relativity categories and docs for preparation of same	Discovery (Non-Deposition)
4/15/2020	Mark Johnson	0.2	\$1,150	\$230	com w/ Jen Henderson of Henderson Search, potential vendor for review of Residency Agreements	Discovery (Non-Deposition)
4/15/2020	Mark Johnson	0.2	\$1,150	\$230	review and analyzed proposed stipulation re confidentiality of docs to be produced by Placer County; email to City Attorney re same and expectations re confidential designations, protocol for providing copies to opposing counsel	Discovery (Non-Deposition)
4/15/2020	Mark Johnson	0.2	\$1,150	\$230	review emal and attached Memo from TCC re transition of 3 facilities from Brookdale to other operators; respond w/ questions and instructions for documenting same	Discovery (Non-Deposition)
4/15/2020	Mark Johnson	0.2	\$1,150	\$230	review status memo from J Proctor re progress on document review and identification of docs describing procedures	Discovery (Non-Deposition)
4/15/2020	Rachel Steyer	4.8	\$750	\$3,600	reviewing intakes, editing, determine which to draft for declarations,d rafting declaration	Class Certification
4/15/2020	Rachel Steyer	2.1	\$750	\$1,575	reviewed and edited Brookdale class outreach script, circulated email to Brookdale team with attachment	Class Outreach and Contact
4/15/2020	Travis Close	1.0	\$850	\$850	Update DSS facility citation tracking sheet (Anaheim-Carmel Valley)	Case Organization, Planning and Strategy
4/15/2020	Travis Close	1.1	\$850	\$935	Update DSS facility citation tracking sheet (Carmel Valley-Lodi)	Case Organization, Planning and Strategy
4/15/2020	Travis Close	0.9	\$850	\$765	Update DSS facility citation tracking sheet (Lodi-Salinas)	Case Organization, Planning and Strategy
4/15/2020	Travis Close	0.3	\$850	\$255	investigate change of ownership at Brookdale salinas	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/15/2020	Travis Close	0.9	\$850	\$765	memo to MTJ, GBW re: recent ownership & management changes at Brookdale facilities	Case Organization, Planning and Strategy
4/15/2020	Travis Close	0.9	\$850	\$765	Update DSS facility citation tracking sheet (Salinas-Yorba Linda)	Case Organization, Planning and Strategy
4/15/2020	Travis Close	1.0	\$850	\$850	Targeted doc review — district director of operations (various) — # BKD0197174-BKD0213225 (107-131 of 340)	Discovery (Non-Deposition)
4/15/2020	Travis Close	1.0	\$850	\$850	Targeted doc review — district director of operations (various) — # BKD0213225-BKD0235920 (131-159 of 340)	Discovery (Non-Deposition)
4/15/2020	Travis Close	0.3	\$850	\$255	Review/analyze brookdale's how-to records organized by JMP for task times	Discovery (Non-Deposition)
4/16/2020	Guy Wallace	0.2	\$1,350	\$270	com's with MTJ re preparation of proposed stipulation re Residency Agreements containing standard language as resolution of discovery dispute re Residency Agreements allegedly located solely in local facilities	Discovery (Non-Deposition)
4/16/2020	Guy Wallace	0.6	\$1,350	\$810	review and analysis of draft report from Waters re San Juan Capistrano facility	Experts (Including Retention)
4/16/2020	Mark Johnson	0.2	\$1,150	\$230	follow up call with com w/ Heretick software rep re next step in project, introduction to intermeidary vendors	Discovery (Non-Deposition)
4/16/2020	Mark Johnson	0.2	\$1,150	\$230	com w/ GBW re residency agreement review project; proposed appraoch and strategy for stipulation, document review projects for staff	Discovery (Non-Deposition)
4/16/2020	Mark Johnson	0.1	\$1,150	\$115	review emails from Justin P. (x2) re progress of document review and anaysis, projected timelines	Discovery (Non-Deposition)
4/16/2020	Mark Johnson	0.1	\$1,150	\$115	review further email/memo from TCC re changes in operational status of several Brookdale fasilities, documentation re same.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/16/2020	Rachel Steyer	6.7	\$750	\$5,025	reviewing intakes, drafting and editing declarations	Class Certification
4/16/2020	Travis Close	0.6	\$850	\$510	update master facility spreadsheet with former facilities/post-brookdale transition info	Case Organization, Planning and Strategy
4/16/2020	Travis Close	0.2	\$850	\$170	call with Heretik, MTJ re: outsourcing project for residency agreement analysis	Case Organization, Planning and Strategy
4/16/2020	Travis Close	1.4	\$850	\$1,190	analyze/organize RA database filenames & isolate resident names	Case Organization, Planning and Strategy
4/16/2020	Travis Close	1.0	\$850	\$850	continue analyzing resident database to create readable columns in spreadsheet	Case Organization, Planning and Strategy
4/16/2020	Travis Close	1.0	\$850	\$850	Targeted doc review — district director of operations (various) — # BKD0213225-BKD0239582 (131-149 of 340)	Discovery (Non-Deposition)
4/16/2020	Travis Close	0.9	\$850	\$765	further analysis of salinas/orangevale/grand terrace facility divestments	Discovery (Non-Deposition)
4/16/2020	Travis Close	0.5	\$850	\$425	Doc review status report update/analysis	Discovery (Non-Deposition)
4/17/2020	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of and revise and edit draft class certification declarations from putative class members; com's with MTJ; RLS; BCR re same (.2)	Class Certification
4/17/2020	Guy Wallace	0.3	\$1,350	\$405	tc with MTJ re D's position re no further production of Residency Agreements from facilities; number of Residency Agreements produced in production from D's database; preparation of proposed stipulation as part of final meet and confer efforts re same	Discovery (Non-Deposition)
4/17/2020	Mark Johnson	1.0	\$1,150	\$1,150	mtg w/ TCC, RAB, JP, EO, LEC re status and strategy on multiple document review, analysis and investigation, including city subpoenaed documents, DSS documents, our own production of client documents, residency agreement analysis, targeted saved searches,	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/17/2020	Mark Johnson	0.2	\$1,150	\$230	call w/ TCC re results of analysis of residency agreements and additional analysis for proposing stipulation	Discovery (Non-Deposition)
4/17/2020	Mark Johnson	1.0	\$1,150	\$1,150	review and analysis of spreadsheet from TCC of 1,200 residency agreements, language included; review of samples of agreements	Discovery (Non-Deposition)
4/17/2020	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re residency agreement analysis project, scope and strategy for proposed stipulation or motion to compel.	Discovery (Non-Deposition)
4/17/2020	Mark Johnson	0.5	\$1,150	\$575	review notes and prior emails to prepare for conference call w/ SW team on outstanding document review and analysis projects, DSS and Cit productions, saved search projects.	Discovery (Non-Deposition)
4/17/2020	Rachel Steyer	5.9	\$750	\$4,425	reviewing intakes, reviewing and editing declarations	Class Certification
4/17/2020	Rachel Steyer	0.7	\$750	\$525	follow up conversations with two class members re declarations	Class Outreach and Contact
4/17/2020	Travis Close	0.2	\$850	\$170	email to team re: notes/agenda for meeting	Case Organization, Planning and Strategy
4/17/2020	Travis Close	1.1	\$850	\$935	continue analyzing RA database filenames & translating list of resident names into readable column	Case Organization, Planning and Strategy
4/17/2020	Travis Close	0.6	\$850	\$510	Analyze resident name counts using excel pivot tables	Case Organization, Planning and Strategy
4/17/2020	Travis Close	0.4	\$850	\$340	email to MTJ, RAB re: unique names residency agreement analysis	Case Organization, Planning and Strategy
4/17/2020	Travis Close	1.2	\$850	\$1,020	Continue investigation & filling in former facility info into master spreadsheet	Case Organization, Planning and Strategy
4/17/2020	Travis Close	0.2	\$850	\$170	call w/ MTJ re: residency agreement analysis	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/17/2020	Travis Close	1.1	\$850	\$935	Targeted doc review — district director of operations (various) — # BKD0239582-BKD0264122 (149-182 of 340)	Discovery (Non-Deposition)
4/17/2020	Travis Close	1.1	\$850	\$935	doc review analysis meeting w/ RAB, MTJ, EPO, and JMP	Discovery (Non-Deposition)
4/19/2020	Guy Wallace	4.4	\$1,350	\$5,940	review and analysis of draft declarations from putative class members prepared by RLS; BCR & revise and edit same	Class Certification
4/20/2020	Guy Wallace	0.7	\$1,350	\$945	tc with MTJ; TCC; RLS; BCR re preparation of putative class member declarations and revisions to drafts thereof	Class Certification
4/20/2020	Guy Wallace	0.4	\$1,350	\$540	com's to MTJ; RLS; BCR re preparation of putative class member declarations and drafts of model declarations re same	Class Certification
4/20/2020	Mark Johnson	0.8	\$1,150	\$920	call w/ GBW, TCC, Rachel S, Brianda R re class outreach and declartions	Class Certification
4/20/2020	Mark Johnson	0.7	\$1,150	\$805	review draft class member declarations and GBW comments re same	Class Certification
4/20/2020	Mark Johnson	1.3	\$1,150	\$1,495	telephone mtg w/ PWC reps and Heretik rep re residency agreement review project background, decription conflict checks	Discovery (Non-Deposition)
4/20/2020	Mark Johnson	0.5	\$1,150	\$575	draft response to OC re residency agreement issue, impasse, potential stipulation, scope of production of electronic residence agreements.	Discovery (Non-Deposition)
4/20/2020	Mark Johnson	0.4	\$1,150	\$460	email exchanges w/ RAB (.3) re issues with searchabiity of resident file production, production of Kronos data and PSS technical manuals.	Discovery (Non-Deposition)
4/20/2020	Rachel Steyer	4.8	\$750	\$3,600	finishing draft declaration for class member	Class Certification
4/20/2020	Rachel Steyer	0.3	\$750	\$225	reviewing comments and redlines from GBW on draft declarations	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/20/2020	Rachel Steyer	0.4	\$750	\$300	attempted follow up outreach calls	Class Outreach and Contact
4/20/2020	Rachel Steyer	0.2	\$750	\$150	reviewing files from client, creating client folder, correspondence	Class Outreach and Contact
4/20/2020	Rachel Steyer	0.9	\$750	\$675	video conference meeting with BCR, GBW, MTJ, TC re Brookdale outreach efforts, drafting declarations	Class Outreach and Contact
4/20/2020	Travis Close	1.2	\$850	\$1,020	Update former facility information into master spreadsheet	Case Organization, Planning and Strategy
4/20/2020	Travis Close	0.4	\$850	\$340	continue filling in former facility information into master spreadsheet	Case Organization, Planning and Strategy
4/20/2020	Travis Close	0.7	\$850	\$595	continue filling in former facility information into master spreadsheet	Case Organization, Planning and Strategy
4/20/2020	Travis Close	1.2	\$850	\$1,020	meeting w/ PwC & Heretik re: residency agreement database analysis project	Case Organization, Planning and Strategy
4/20/2020	Travis Close	1.9	\$850	\$1,615	analyze facilities included/missing from residency agreement database	Case Organization, Planning and Strategy
4/20/2020	Travis Close	1.0	\$850	\$850	team call discussing class outreach strategy	Case Organization, Planning and Strategy
4/20/2020	Travis Close	1.0	\$850	\$850	argeted doc review — district director of operations (various) — # BKD0264122- BKD0276849 (182-205 of 340)	Discovery (Non-Deposition)
4/20/2020	Travis Close	0.3	\$850	\$255	review/analyzse recent production of PSS training materials & csv data	Discovery (Non-Deposition)
4/20/2020	Travis Close	0.2	\$850	\$170	edits to MTJ's draft meet and confer letter re: residency agreements	Other Motions
4/21/2020	Guy Wallace	0.6	\$1,350	\$810	review and analysis of revised script re class member outreach callls; revise and edit same	Class Certification
4/21/2020	Mark Johnson	0.2	\$1,150	\$230	coms w/ PcW and with Heretiks software rep re residency agreement review project	Discovery (Non-Deposition)
4/21/2020	Rachel Steyer	0.3	\$750	\$225	reviewing client files, adding to client folder, correspondence	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/21/2020	Rachel Steyer	0.5	\$750	\$375	conversation with Lois Such re outreach and declaration drafting process	Class Outreach and Contact
4/21/2020	Travis Close	0.9	\$850	\$765	update records of subpoenas received from dss offices/cities	Case Organization, Planning and Strategy
4/21/2020	Travis Close	0.6	\$850	\$510	data analysis spreadsheet comparing owner/manager entities	Case Organization, Planning and Strategy
4/21/2020	Travis Close	0.6	\$850	\$510	ownership analysis/search "BLC Chancellor"	Case Organization, Planning and Strategy
4/21/2020	Travis Close	0.3	\$850	\$255	review/analyze article by opposing counsel re: class certification defense	Case Organization, Planning and Strategy
4/21/2020	Travis Close	1.1	\$850	\$935	continue investigating ownership/leases of facilities (search: "BLC Chancellor")	Case Organization, Planning and Strategy
4/21/2020	Travis Close	0.7	\$850	\$595	continue investigating ownership/leases of facilities (search: Health Care Property Investors)	Case Organization, Planning and Strategy
4/21/2020	Travis Close	1.0	\$850	\$850	Targeted doc review — district director of operations (various) — # BKD0276849-BKD0281203 (205-224 of 340)	Discovery (Non-Deposition)
4/22/2020	Mark Johnson	2.4	\$1,150	\$2,760	review and analysis of document production for budget related spreadsheets and review same for scope, completeness and differentiation of documents and tabs.	Discovery (Non-Deposition)
4/22/2020	Mark Johnson	1.2	\$1,150	\$1,380	analysis of Kronos data produced, comparison to format and fields requested, identify scope of data and facilities included.	Discovery (Non-Deposition)
4/22/2020	Mark Johnson	0.7	\$1,150	\$805	draft email to COC Brian U and David Marks describing Kronos production and seeking input on sufficiency; r&a responses	Discovery (Non-Deposition)
4/22/2020	Mark Johnson	0.1	\$1,150	\$115	com w/ TCC re analyiis of job descriptions and other material, , comparison to jobs included in Kronos data.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/22/2020	Rachel Steyer	1.0	\$750	\$750	drafting and editing declarations	Class Certification
4/22/2020	Travis Close	0.7	\$850	\$595	research US access board guidance on new construction, alterations, and additions	Case Organization, Planning and Strategy
4/22/2020	Travis Close	0.9	\$850	\$765	continue investigating ownership/leases of facilities (search: Health Care Property Investors)	Case Organization, Planning and Strategy
4/22/2020	Travis Close	1.3	\$850	\$1,105	continue investigating ownership/leases of facilities (search: Health Care Property Investors)	Case Organization, Planning and Strategy
4/22/2020	Travis Close	1.2	\$850	\$1,020	Eidler continue investigating ownership/leases of facilities (search: HCP)	Case Organization, Planning and Strategy
4/22/2020	Travis Close	0.4	\$850	\$340	review/edit draft outreach script and class member declaration by RLS	Class Outreach and Contact
4/22/2020	Travis Close	1.0	\$850	\$850	Targeted doc review — district director of operations (various) — # BKD0281203-BKD0284208 (224-241 of 340)	Discovery (Non-Deposition)
4/22/2020	Travis Close	0.3	\$850	\$255	Review EPO's analysis/progress on identifying new construction and alterations from building records	Discovery (Non-Deposition)
4/22/2020	Travis Close	0.5	\$850	\$425	search for job descriptions matching "Exempt 999"	Discovery (Non-Deposition)
4/23/2020	Mark Johnson	0.5	\$1,150	\$575	draft email to OC re deficiencies in production of Kronos data; review data and prior emails from COC for same	Discovery (Non-Deposition)
4/23/2020	Mark Johnson	0.1	\$1,150	\$115	review email from OC re corrupt searchable text file for residency agreement and draft email to RAB re same and timing of re-production	Discovery (Non-Deposition)
4/23/2020	Travis Close	1.3	\$850	\$1,105	continue investigating ownership/leases of facilities (search: HCP)	Case Organization, Planning and Strategy
4/23/2020	Travis Close	1.3	\$850	\$1,105	review/analyze completed class member intakes to determine viability for declarations	Class Outreach and Contact
4/23/2020	Travis Close	0.4	\$850	\$340	Review draft declarations by GBW and RLS	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/23/2020	Travis Close	1.0	\$850	\$850	Targeted doc review — district director of operations (various) — # BKD0284208-BKD0307428 (241-265 of 340)	Discovery (Non-Deposition)
4/23/2020	Travis Close	1.4	\$850	\$1,190	continue investigating ownership/leases of facilities (search: HCP)	Discovery (Non-Deposition)
4/23/2020	Travis Close	0.5	\$850	\$425	continue searching (999 w/5 salar*) and analyzing job codes provided by defendants	Discovery (Non-Deposition)
4/23/2020	Travis Close	1.2	\$850	\$1,020	begin drafting declaration of lori best	Pleadings and Motions Re: Pleadings
4/24/2020	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of Memorandum decision from Ninth Circuit re D's appeal re Carlson and Quinlan and arbitration; com's with GG; JY re same (.2)	Appeal
4/24/2020	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ; TCC re preparation for meet and confer with Maatman; Riley et al.; revisions to discovery letters re Residency Agreements and transportation and evacuation plans	Discovery (Non-Deposition)
4/24/2020	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re results of meet and confer with Maatman and issues re production of Residency Agreements; PSS data; Kronos data; ESI	Discovery (Non-Deposition)
4/24/2020	Mark Johnson	0.5	\$1,150	\$575	call w/ GBW, TCC re strategy for pusuing issues presented in letter briefs on residency agreements and policies concerning evacuation and transportation policies	Discovery (Non-Deposition)
4/24/2020	Mark Johnson	0.7	\$1,150	\$805	meet and confer call with OC re reidency agreements, evacuation and transpoertraion policis, ESI earch terms and custodians, Kronos data, PSS and PEARS darta,	Discovery (Non-Deposition)
4/24/2020	Mark Johnson	0.5	\$1,150	\$575	preliminary review and analysis of assessment data produced by defendants	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/24/2020	Mark Johnson	0.2	\$1,150	\$230	email to COC Marks w/ copies to others, re scope and format of assessment data produced by Brookdale, suitability for use by experts in staffing analysis.	Discovery (Non-Deposition)
4/24/2020	Mark Johnson	0.4	\$1,150	\$460	review notes of prior meet and confer mtg and related correspondence to prepare for meet and confer; draft agenda and notes for same	Discovery (Non-Deposition)
4/24/2020	Mark Johnson	0.5	\$1,150	\$575	furrther call w/ GBW re strategy for meet and confer w/OC re various issues, merits of arguments on residency agreements and transportation and evacuation policies, timing and strategy on potential motions to compel.	Discovery (Non-Deposition)
4/24/2020	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW following meet and confer w/ OC on various issues re positions and strategy, follow up steps.	Discovery (Non-Deposition)
4/24/2020	Mark Johnson	0.4	\$1,150	\$460	draft memo to file and COC recapping meet and confer and Defendants' positions on outstanding dicoverly	Discovery (Non-Deposition)
4/24/2020	Rachel Steyer	0.9	\$750	\$675	updating and editing outreach script (incorporating GBW edits), circulating draft, updating excel spreadsheet re declaration draft progress	Class Outreach and Contact
4/24/2020	Rachel Steyer	0.4	\$750	\$300	conversation with Rosemary Allen, daughter of Lisa Ortiz re setting up time to conduct intake; starting to transfer info to intake doc, called and left VM	Class Outreach and Contact
4/24/2020	Travis Close	0.2	\$850	\$170	review appellate 9th circuit decision re: arbitration agreements	Appeal
4/24/2020	Travis Close	0.6	\$850	\$510	call w/ MTJ, GBW re: discovery strategy before meet and confer call this afternoon	Case Organization, Planning and Strategy
4/24/2020	Travis Close	0.8	\$850	\$680	Analyze dates of licensing for every brookdale facility	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/24/2020	Travis Close	0.8	\$850	\$680	meet and confer with opposing counsel re: outstanding discovery	Case Organization, Planning and Strategy
4/24/2020	Travis Close	0.2	\$850	\$170	Review/analyze attorney's letter from scotts valley re: resident overcharging	Class Outreach and Contact
4/24/2020	Travis Close	0.4	\$850	\$340	email to RLS re: viability of Ms. Ortiz submitting declaration given prior representation	Class Outreach and Contact
4/24/2020	Travis Close	0.3	\$850	\$255	review Ds representations in correspondence re: licensing dates; respond to argument of class period acquisitions	Communications With Opposing Counsel
4/24/2020	Travis Close	1.0	\$850	\$850	Targeted doc review — district director of operations (various) — # BKD0307428-BKD0310148 (265-290 of 340)	Discovery (Non-Deposition)
4/24/2020	Travis Close	0.7	\$850	\$595	continue investigating ownership/leases of facilities (search: HCP — Sterling Court)	Discovery (Non-Deposition)
4/26/2020	Guy Wallace	0.3	\$1,350	\$405	revise and edit draft stipulation re Residency Agreements; com's with MTJ re same	Discovery (Non-Deposition)
4/26/2020	Mark Johnson	2.3	\$1,150	\$2,645	draft proposed stip and order re residency agreement production; review and incorporate changes from GBW	Discovery (Non-Deposition)
4/27/2020	Mark Johnson	0.3	\$1,150	\$345	final revisions to draft stipulation re residency agreements and send w/ cover email to OC	Discovery (Non-Deposition)
4/27/2020	Rachel Steyer	3.0	\$750	\$2,250	finishing drafting and editing declaration for stephen baggott	Class Certification
4/27/2020	Rachel Steyer	0.6	\$750	\$450	editing BCR draft declaration, composing email with feedback	Class Certification
4/27/2020	Travis Close	0.3	\$850	\$255	Verify number of facilities in which resident agreements have been provided and Interrogatory responses of class members	Case Organization, Planning and Strategy
4/27/2020	Travis Close	0.4	\$850	\$340	email to MTJ re: residency agreement stip with defendants	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/27/2020	Travis Close	0.9	\$850	\$765	continue investigating ownership/leases of facilities (search: HCP — Yorba Linda)	Case Organization, Planning and Strategy
4/27/2020	Travis Close	0.8	\$850	\$680	continue investigating ownership/leases of facilities (search: HCP — San Juan Capistrano)	Case Organization, Planning and Strategy
4/27/2020	Travis Close	0.8	\$850	\$680	continue investigating ownership/leases of facilities (search: HCP — San Dimas)	Case Organization, Planning and Strategy
4/27/2020	Travis Close	0.9	\$850	\$765	continue investigating ownership/leases of facilities (search: HCP — Riverwalk)	Case Organization, Planning and Strategy
4/27/2020	Travis Close	1.0	\$850	\$850	continue investigating ownership/leases of facilities (search: HCP — Red Bluff, Orangevale)	Case Organization, Planning and Strategy
4/27/2020	Travis Close	1.0	\$850	\$850	Targeted doc review — district director of operations (various) — # BKD0310148-BKD0321257 (290-305 of 340)	Discovery (Non-Deposition)
4/27/2020	Travis Close	1.1	\$850	\$935	continue drafting declaration of Lori Best (Admission/move-in)	Pleadings and Motions Re: Pleadings
4/27/2020	Travis Close	0.8	\$850	\$680	continue drafting declaration of Lori Best (personal services/basic services)	Pleadings and Motions Re: Pleadings
4/28/2020	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re class member declarations and impact of arb clauses, com w/ GCG re same	Class Certification
4/28/2020	Mark Johnson	0.4	\$1,150	\$460	calls w/ COC re plaintiff declarations, responses to written discovery, extension of time for same and, class member declarations	Discovery (Non-Deposition)
4/28/2020	Rachel Steyer	1.3	\$750	\$975	editing and drafting declarations	Class Certification
4/28/2020	Rachel Steyer	1.7	\$750	\$1,275	updating excel spreadsheet re organization and status of intakes and draft declarations	Class Outreach and Contact
4/28/2020	Rachel Steyer	0.3	\$750	\$225	responding to email from Amy Xu re status of declarants and arbitration	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/28/2020	Rachel Steyer	1.1	\$750	\$825	had long discussion with potential class member to answer his questions, back and forth emails with BCR to discuss what his concerns were and how to proceed	Class Outreach and Contact
4/28/2020	Travis Close	0.9	\$850	\$765	continue investigating ownership/leases of facilities (search: Blackstone - Central Whittier)	Case Organization, Planning and Strategy
4/28/2020	Travis Close	0.7	\$850	\$595	continue investigating ownership/leases of facilities (search: Blackstone - Brea)	Case Organization, Planning and Strategy
4/28/2020	Travis Close	0.9	\$850	\$765	continue investigating ownership/leases of facilities (search: Blackstone - Citrus Heights)	Case Organization, Planning and Strategy
4/28/2020	Travis Close	0.6	\$850	\$510	analyze/review joint venture agreement (via SEC) between emeritus and blackstone real estate	Case Organization, Planning and Strategy
4/28/2020	Travis Close	0.2	\$850	\$170	review team correspondence re: draft ROGs/declarations from clients & class members	Class Outreach and Contact
4/28/2020	Travis Close	0.1	\$850	\$85	review spreadsheet of class member intakes/declaration progress by RLS	Class Outreach and Contact
4/28/2020	Travis Close	1.0	\$850	\$850	Targeted doc review — district director of operations (various) — # BKD0321257-BKD0326187 (305-321 of 340)	Discovery (Non-Deposition)
4/28/2020	Travis Close	1.8	\$850	\$1,530	continue drafting declaration of lori best (personal services, basic services and activities)	Pleadings and Motions Re: Pleadings
4/28/2020	Travis Close	1.1	\$850	\$935	continue drafting declaration of lori best (physical access barriers)	Pleadings and Motions Re: Pleadings
4/28/2020	Travis Close	0.6	\$850	\$510	continue drafting declaration of lori best (complaints to management)	Pleadings and Motions Re: Pleadings
4/29/2020	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ re responding to D's written discovery to the named P's	Discovery (Non-Deposition)
4/29/2020	Mark Johnson	0.5	\$1,150	\$575	email exchanges w/ SCC, BBK, BU, R. Steyer re class outreach and declarations, poetentional declarants recommended by Sharon Eidler.	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/29/2020	Mark Johnson	2.0	\$1,150	\$2,300	review, edit template for plaintiffs' responses to D's rogs	Discovery (Non-Deposition)
4/29/2020	Mark Johnson	0.6	\$1,150	\$690	email exchanges w/ COC BBK, SCC, BU, AX re plan for reponding to discover served on Plaintiffs, allocationm of wor, distributionm and use of tempate	Discovery (Non-Deposition)
4/29/2020	Rachel Steyer	0.4	\$750	\$300	eamils with co-counsel and internally re status of class outreach	Class Outreach and Contact
4/29/2020	Travis Close	0.5	\$850	\$425	analyze Welltower org chart & BKD facility ownership	Case Organization, Planning and Strategy
4/29/2020	Travis Close	0.9	\$850	\$765	finish revising/proofing draft declaration of tori best before submittal to team	Class Certification
4/29/2020	Travis Close	1.1	\$850	\$935	beging drafting jeff mortlock declaration (intro, assisted living needs, personal care services)	Class Certification
4/29/2020	Travis Close	0.2	\$850	\$170	review RLS draft declarationof steven baggot	Class Outreach and Contact
4/29/2020	Travis Close	0.3	\$850	\$255	review/analyze declarant leads shared by SSC	Class Outreach and Contact
4/29/2020	Travis Close	0.2	\$850	\$170	email to team re: draft declaration of lori best	Class Outreach and Contact
4/29/2020	Travis Close	0.8	\$850	\$680	begin researching for Jeff Mortlock declaration (review intake, financial docs produced by Brookdale)	Class Outreach and Contact
4/29/2020	Travis Close	1.0	\$850	\$850	Targeted doc review — district director of operations (various) — # BKD0326187-BKD0347037 (321-340 of 340)	Discovery (Non-Deposition)
4/29/2020	Travis Close	1.3	\$850	\$1,105	Review/categorize new files received by DSS (former facilities, CDSS0041188-CDSS0044543, 554-588 of 630)	Discovery (Non-Deposition)
4/29/2020	Travis Close	1.2	\$850	\$1,020	review/categorize new files received by DSS (former facilities, CDSS0044543-CDSS0046385, 588-612 of 630)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/29/2020	Travis Close	0.6	\$850	\$510	review/categorize new files received by DSS (former facilities, CDSS0046385-CDSS0049140, 612-630 of 630)	Discovery (Non-Deposition)
4/30/2020	Mark Johnson	1.0	\$1,150	\$1,150	draft email memo to David Marks, Brian U and other COC re docs and data needed for expert staffing analysis, status of same and questions re follow up	Class Certification
4/30/2020	Mark Johnson	0.1	\$1,150	\$115	coms w/ COC re extension of time to respond to RFPs and rogs	Discovery (Non-Deposition)
4/30/2020	Mark Johnson	0.1	\$1,150	\$115	coms w. OC re stipulation re production of residency agreement	Discovery (Non-Deposition)
4/30/2020	Mark Johnson	3.2	\$1,150	\$3,680	draft 4 page memo re status on multiple discovery issues and strategy and timing for addressing each.	Discovery (Non-Deposition)
4/30/2020	Mark Johnson	0.4	\$1,150	\$460	draft email to JP and TCC describing document analysis project re transportation and evacuation polices	Discovery (Non-Deposition)
4/30/2020	Travis Close	0.2	\$850	\$170	email to MTJ, JMP re: emergency evac/ transportation docs	Case Organization, Planning and Strategy
4/30/2020	Travis Close	0.9	\$850	\$765	continue investigating ownership/leases of facilities (search: HCP - Apple Valley)	Case Organization, Planning and Strategy
4/30/2020	Travis Close	1.2	\$850	\$1,020	continue investigating ownership/leases of facilities (search: BLC - Cortona Park, Irvine)	Case Organization, Planning and Strategy
4/30/2020	Travis Close	0.2	\$850	\$170	email to jeff mortlock re: additional info needed for declaration	Class Outreach and Contact
4/30/2020	Travis Close	1.0	\$850	\$850	Targeted doc review — “district director” — # BKD0112871-BKD0203105 (1-15 of 144)	Discovery (Non-Deposition)
4/30/2020	Travis Close	1.0	\$850	\$850	Targeted doc review — “district director” — # BKD0203105-BKD0239090 (15-31 of 144)	Discovery (Non-Deposition)
4/30/2020	Travis Close	0.5	\$850	\$425	search for emergency manual / evac ability forms based on policy doc for MTJ	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/30/2020	Travis Close	0.2	\$850	\$170	review email by MTJ re: kronos data needed for experts	Experts (Including Retention)
4/30/2020	Travis Close	0.8	\$850	\$680	Eidler — continue investigating ownership/leases of facilities (search: HCP - Cherry Hills)	Imported
4/30/2020	Travis Close	0.8	\$850	\$680	continue drafting declaration of Jeffrey Mortlock (basic services)	Pleadings and Motions Re: Pleadings
4/30/2020	Travis Close	1.3	\$850	\$1,105	continue drafting declaration of Jeffrey Mortlock (notice of problems, barriers to moving out)	Pleadings and Motions Re: Pleadings
5/1/2020	Guy Wallace	0.6	\$1,350	\$810	com's with GG; MTJ re preparation of motions to compel re Residency Agreements; PSS records; alleged local policies re ADA compliance, emergency evacuation; transportation	Discovery (Non-Deposition)
5/1/2020	Mark Johnson	0.2	\$1,150	\$230	review and respond to email from COC D Marks re issues with PSS data production and other data and docs needed by experts for staffing analysis	Discovery (Non-Deposition)
5/1/2020	Mark Johnson	1.4	\$1,150	\$1,610	Draft, revise and finalize correspondence to OC re meeting and conferring PSS data format	Discovery (Non-Deposition)
5/1/2020	Mark Johnson	0.2	\$1,150	\$230	email to COC re discovery plan for outstanding issues, proposed email to OC re PSS data	Discovery (Non-Deposition)
5/1/2020	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW re discovery issues, identification of motions to compel, strategy for timing and arguments	Discovery (Non-Deposition)
5/1/2020	Travis Close	0.9	\$850	\$765	continue investigating ownership/leases of facilities (search: Summerville - Chanate, Alhambra)	Case Organization, Planning and Strategy
5/1/2020	Travis Close	1.1	\$850	\$935	continue investigating ownership/leases of facilities (search: Summerville - Ahaheim, Anaheim Hills)	Case Organization, Planning and Strategy
5/1/2020	Travis Close	1.0	\$850	\$850	Continue investigating ownership/leases of facilities (search: Summerville - Auburn, Bakersfield)	Case Organization, Planning and Strategy
5/1/2020	Travis Close	0.3	\$850	\$255	review MTJ's updated discovery plan/strategy for further MTCs	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/1/2020	Travis Close	0.9	\$850	\$765	continue investigating ownership/leases of facilities (search: Summerville - Brookhurst, Chatsworth)	Case Organization, Planning and Strategy
5/1/2020	Travis Close	0.5	\$850	\$425	continue investigating ownership/leases of facilities (search: Summerville - Clairemont, Danville)	Case Organization, Planning and Strategy
5/1/2020	Travis Close	0.4	\$850	\$340	continue investigating ownership/leases of facilities (search: Summerville - Danville Diablo Rd.)	Case Organization, Planning and Strategy
5/1/2020	Travis Close	1.0	\$850	\$850	Targeted doc review — “district director” — # BKD0239090-BKD0243040 (31-46 of 144)	Discovery (Non-Deposition)
5/1/2020	Travis Close	1.0	\$850	\$850	Targeted doc review — “district director” — # BKD0243040-BKD0243215 (46-60 of 144)	Discovery (Non-Deposition)
5/1/2020	Travis Close	0.3	\$850	\$255	review/edit MTJ’s proposed letter to Ds re: PSS data	Discovery (Non-Deposition)
5/4/2020	Travis Close	0.8	\$850	\$680	Analyze Ds proposed custodian list and research additional custodians to add	Case Organization, Planning and Strategy
5/4/2020	Travis Close	1.2	\$850	\$1,020	Continue analyzing Ds proposed custodian list and researching additional custodians to add	Case Organization, Planning and Strategy
5/4/2020	Travis Close	0.8	\$850	\$680	Continue analyzing Ds proposed custodian list and researching additional custodians to add	Case Organization, Planning and Strategy
5/4/2020	Travis Close	0.9	\$850	\$765	continue investigating ownership/leases of facilities (Search: Summerville - Folsom, Garden Grove)	Case Organization, Planning and Strategy
5/4/2020	Travis Close	1.0	\$850	\$850	continue investigating ownership/leases of facilities (Grand Terracne, Kettleman Lane)	Case Organization, Planning and Strategy
5/4/2020	Travis Close	0.2	\$850	\$170	Review draft declaration of Jeff Mortlock in prep for call	Class Outreach and Contact
5/4/2020	Travis Close	0.1	\$850	\$85	call to Jeff Mortlock re: additional info needed for draft declaration (voicemail)	Class Outreach and Contact
5/4/2020	Travis Close	1.3	\$850	\$1,105	Research contact info on class member leads from SSC	Class Outreach and Contact
5/4/2020	Travis Close	1.0	\$850	\$850	Targeted doc review — “district director” — # BKD0243215 -BKD0243516 (60-77 of 144)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/4/2020	Travis Close	0.2	\$850	\$170	Email to MTJ re: letter from monterey park DSS office	Discovery (Non-Deposition)
5/4/2020	Travis Close	0.3	\$850	\$255	email to MTJ, GBW re: proposed additional custodians for ESI collection	Discovery (Non-Deposition)
5/5/2020	Travis Close	0.2	\$850	\$170	Review EPO's spreadsheet progress analyzing construction/alteration dates for facilities	Case Organization, Planning and Strategy
5/5/2020	Travis Close	1.0	\$850	\$850	continue investigating ownership/leases of facilities (Search: Summerville - Loma Linda, Napa)	Case Organization, Planning and Strategy
5/5/2020	Travis Close	0.9	\$850	\$765	continue investigating ownership/leases of facilities (Search: Summerville - North Fremont, North Tarzana)	Case Organization, Planning and Strategy
5/5/2020	Travis Close	0.9	\$850	\$765	continue investigating ownership/leases of facilities (Search: Summerville - Northridge, Oceanside)	Case Organization, Planning and Strategy
5/5/2020	Travis Close	0.8	\$850	\$680	continue investigating ownership/leases of facilities (Search: Summerville - Roseville, Salinas)	Case Organization, Planning and Strategy
5/5/2020	Travis Close	0.7	\$850	\$595	continue investigating ownership/leases of facilities (Search: Summerville - San Ramon, Sunwest)	Case Organization, Planning and Strategy
5/5/2020	Travis Close	0.5	\$850	\$425	finish researching contact info on class member leads from SSC	Class Outreach and Contact
5/5/2020	Travis Close	1.0	\$850	\$850	Targeted doc review — "district director" — # BKD0243516-BKD0243763 (77-95 of 144)	Discovery (Non-Deposition)
5/5/2020	Travis Close	0.6	\$850	\$510	review/analyze new class action complaint filed against brookdale (esp. task time allegations) & send to co-counsel	Pleadings and Motions Re: Pleadings
5/6/2020	Guy Wallace	0.5	\$1,350	\$675	review and analysis of J. Gilliam opinion in Racies v. Quincy re decertification of CLRA false or misleading statements class	Class Certification
5/6/2020	Guy Wallace	0.5	\$1,350	\$675	review and analysis of D's proposed stipulation regarding the production of Residency Agreements; com's with MTJ re response thereto	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/6/2020	Mark Johnson	0.3	\$1,150	\$345	review and analyze proposed counter offer on residency agreement stip	Discovery (Non-Deposition)
5/6/2020	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re D's counter proposal on residency agreement stip and strategy for meet and confer, motion	Discovery (Non-Deposition)
5/6/2020	Mark Johnson	0.3	\$1,150	\$345	draft memo to COC re analysis of Ds counterproposal on residency agreement stip with recommendations	Discovery (Non-Deposition)
5/6/2020	Mark Johnson	0.2	\$1,150	\$230	com w/TCC re analysis of residency agreements, attachments and adenda and sampes of same	Discovery (Non-Deposition)
5/6/2020	Mark Johnson	0.3	\$1,150	\$345	review and analyze results of TCC analysis of residency agreement attachments and addenda for meet and confer w/ OC re residency agreement stip or motion to compel.	Discovery (Non-Deposition)
5/6/2020	Mark Johnson	0.1	\$1,150	\$115	com w/ RAB re loading replacement text files for residency agreements.	Discovery (Non-Deposition)
5/6/2020	Travis Close	0.7	\$850	\$595	continue investigating ownership/leases of facilities (Search: Summerville - Tracy, Uptown Whittier)	Case Organization, Planning and Strategy
5/6/2020	Travis Close	0.8	\$850	\$680	continue investigating ownership/leases of facilities (Search: Summerville - Valley View, Walnut)	Case Organization, Planning and Strategy
5/6/2020	Travis Close	0.7	\$850	\$595	continue investigating ownership/leases of facilities (Search: Blackstone/HCP - Irvine, Lodi)	Case Organization, Planning and Strategy
5/6/2020	Travis Close	0.6	\$850	\$510	continue investigating ownership/leases of facilities (Search: Blackstone/HCP - Mirage Inn, Monrovia)	Case Organization, Planning and Strategy
5/6/2020	Travis Close	0.5	\$850	\$425	continue investigating ownership/leases of facilities (Murrieta, North Euclid)	Case Organization, Planning and Strategy
5/6/2020	Travis Close	1.5	\$850	\$1,275	Continue analyzing variance of residency agreement attachments over time & send to MTJ, GBW	Case Organization, Planning and Strategy
5/6/2020	Travis Close	0.2	\$850	\$170	Review/analyze Ds redlined stipulation re: residency agreements	Communications With Opposing Counsel

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/6/2020	Travis Close	1.0	\$850	\$850	Targeted doc review — “district director” — # BKD0243763-BKD0244040 (95-112 of 144)	Discovery (Non-Deposition)
5/6/2020	Travis Close	1.7	\$850	\$1,445	Begin analyzing variance of residency agreement attachments/addenda over time	Discovery (Non-Deposition)
5/7/2020	Guy Wallace	0.5	\$1,350	\$675	review and analysis of email from GG re Brookdale's financial status and condition; com's with Paul Regan; MTJ re same	Experts (Including Retention)
5/7/2020	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW re Brookdale financial outlook, article re same; COC concerns and plans for conferring w/ experts re same	Case Organization, Planning and Strategy
5/7/2020	Travis Close	1.0	\$850	\$850	continue investigating ownership/leases of facilities (Search: Blackstone/HCP - Paulin Creek, Redwood City)	Case Organization, Planning and Strategy
5/7/2020	Travis Close	0.9	\$850	\$765	continue investigating ownership/leases of facilities (Search: Blackstone/HCP - Riverside, Riverwalk)	Case Organization, Planning and Strategy
5/7/2020	Travis Close	0.8	\$850	\$680	continue investigating ownership/leases of facilities (Search: Blackstone/HCP - San Dimas, San Jose)	Case Organization, Planning and Strategy
5/7/2020	Travis Close	1.0	\$850	\$850	continue investigating ownership/leases of facilities (Search: Blackstone/HCP - San Pablo, Santa Monica)	Case Organization, Planning and Strategy
5/7/2020	Travis Close	0.8	\$850	\$680	continue investigating ownership/leases of facilities (Search: Blackstone/HCP - Santa Monica Gardens, Scotts Valley)	Case Organization, Planning and Strategy
5/7/2020	Travis Close	1.0	\$850	\$850	continue investigating ownership/leases of facilities (Search: Blackstone/HCP - South Tarzana, Vacaville)	Case Organization, Planning and Strategy
5/7/2020	Travis Close	0.9	\$850	\$765	continue investigating ownership/leases of facilities (Search: Blackstone/HC - Windsor, Cherry Hills)	Case Organization, Planning and Strategy
5/7/2020	Travis Close	1.0	\$850	\$850	Targeted doc review — “district director” — # BKD0243763-BKD0244040-BKD0280378 (112-129 of 144)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/8/2020	Mark Johnson	1.0	\$1,150	\$1,150	review and run searches on D's production of residency agreements following replacement of text overlay file, analyze results.	Discovery (Non-Deposition)
5/8/2020	Mark Johnson	0.4	\$1,150	\$460	email exchanges w/ OC re residency agreement stipulation, counter offers and potential compromises	Discovery (Non-Deposition)
5/8/2020	Mark Johnson	0.4	\$1,150	\$460	email communications with OC Maatman re follow up on PSS data format, meeting and conferring, D's insistence that aggregated data cannot be produced, format of underlying data.	Discovery (Non-Deposition)
5/8/2020	Mark Johnson	0.1	\$1,150	\$115	coms w/ Deputy AG and staff re production of DSS documents	Discovery (Non-Deposition)
5/8/2020	Travis Close	0.9	\$850	\$765	gather declarations iso class cert, supporting docs; send to BBK (co-counsel)	Case / Document Administration
5/8/2020	Travis Close	1.0	\$850	\$850	continue investigating ownership/leases of facilities (Search: HCP - Elk Grove, San Marcos)	Case Organization, Planning and Strategy
5/8/2020	Travis Close	0.6	\$850	\$510	Continue investigating ownership/leases of facilities (Search: HCP - Yorba Linda)	Case Organization, Planning and Strategy
5/8/2020	Travis Close	1.1	\$850	\$935	being drafting memo re: ownership of facilities (outline)	Case Organization, Planning and Strategy
5/8/2020	Travis Close	1.0	\$850	\$850	Targeted doc review — “district director” — #BKD0280378-BKD0334234 (129-144 of 144)	Discovery (Non-Deposition)
5/8/2020	Travis Close	1.1	\$850	\$935	search for/analyze emails from Kelly Grounds (DDO)	Discovery (Non-Deposition)
5/10/2020	Mark Johnson	0.1	\$1,150	\$115	call w/ GBW re meet and confer strategy on residency agreemen and potential stip	Discovery (Non-Deposition)
5/11/2020	Mark Johnson	0.2	\$1,150	\$230	email to BU re scope of Plaintiff declarations iso class certification; locate and include outline of issues to be addressed in same	Class Certification
5/11/2020	Mark Johnson	0.2	\$1,150	\$230	call and emails to potential database experts and expert agencies re database experts	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/11/2020	Mark Johnson	0.4	\$1,150	\$460	sample review of DSS docs recently produced pursuant to subpoena; draft email to staff with instruction for reviewing and documenting scope of same	Discovery (Non-Deposition)
5/11/2020	Travis Close	1.8	\$850	\$1,530	continue drafting memo on ownership of California facilities (intro, Background)	Case Organization, Planning and Strategy
5/11/2020	Travis Close	1.4	\$850	\$1,190	ontinue drafting memo on ownership of California facilities (Fragmentation, construction & acquisition)	Case Organization, Planning and Strategy
5/11/2020	Travis Close	1.2	\$850	\$1,020	continue drafting memo on ownership of California facilities (Healthcare REITs)	Case Organization, Planning and Strategy
5/11/2020	Travis Close	0.8	\$850	\$680	continue drafting memo on ownership of California facilities (Ownership structure)	Case Organization, Planning and Strategy
5/11/2020	Travis Close	1.0	\$850	\$850	Targeted doc review — “Adaline Kiehn” — # BKD0278294-BKD0284225 (1-16 of 349)	Discovery (Non-Deposition)
5/11/2020	Travis Close	1.1	\$850	\$935	Targeted doc review — “Adaline Kiehn” — # BKD0284225-BKD0308677 (16-31 of 349)	Discovery (Non-Deposition)
5/12/2020	Mark Johnson	0.7	\$1,150	\$805	call with rep for database expert firm re potential retention and consultaiton	Discovery (Non-Deposition)
5/12/2020	Mark Johnson	0.1	\$1,150	\$115	com w/ expert agency re need for database expert, scheduling call	Experts (Including Retention)
5/12/2020	Travis Close	0.5	\$850	\$425	continue drafting California facility ownership memo (source of ownership info)	Case Organization, Planning and Strategy
5/12/2020	Travis Close	1.1	\$850	\$935	Continue drafting California facility ownership memo (ownership structure)	Case Organization, Planning and Strategy
5/12/2020	Travis Close	0.7	\$850	\$595	Continue drafting California facility ownership memo (complete table)	Case Organization, Planning and Strategy
5/12/2020	Travis Close	1.0	\$850	\$850	Review/analysis of facility emails— “Adaline Kiehn” (ED, Brookdale Tracy) — # BKD0308677-BKDBKD0317563 (31-47 of 349)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/12/2020	Travis Close	1.0	\$850	\$850	Review/analysis of facility emails— “Adaline Kiehn” (ED, Brookdale Tracy) — # BKD0317563-BKD0318231 (47-65 of 349)	Discovery (Non-Deposition)
5/13/2020	Mark Johnson	0.4	\$1,150	\$460	com w/ rep at AP expert group re potential databse expert for discovery dispute.	Experts (Including Retention)
5/13/2020	Mark Johnson	0.1	\$1,150	\$115	follow up email w/ AP expert group w/ info for search for database expert	Experts (Including Retention)
5/13/2020	Travis Close	1.3	\$850	\$1,105	continue drafting memo re: facility ownerships (complete table of owners)	Case Organization, Planning and Strategy
5/13/2020	Travis Close	1.7	\$850	\$1,445	continue drafting memo re: facility ownerships (complete master table)	Case Organization, Planning and Strategy
5/13/2020	Travis Close	1.5	\$850	\$1,275	continue drafting memo re: facility ownerships (finish master table of owners for every facility)	Case Organization, Planning and Strategy
5/13/2020	Travis Close	0.7	\$850	\$595	Review/analysis for missing citations of building owners (Cortona Park, Irvine, Murrieta)	Case Organization, Planning and Strategy
5/13/2020	Travis Close	1.0	\$850	\$850	Review/analysis of facility emails— “Adaline Kiehn” (ED, Brookdale Tracy) — # BKD0318231-BKD031921 (65-81 of 349)	Discovery (Non-Deposition)
5/13/2020	Travis Close	1.0	\$850	\$850	Review/analysis of facility emails— “Adaline Kiehn” (ED, Brookdale Tracy) — # BKD031921-BKD0325448 (81-98 of 349)	Discovery (Non-Deposition)
5/14/2020	Mark Johnson	0.3	\$1,150	\$345	follow-up com w/ expert agency re database ezpert, review resume and web site infor on expert candidate.	Experts (Including Retention)
5/14/2020	Travis Close	1.0	\$850	\$850	Review/analysis of facility emails— “Adaline Kiehn” (ED, Brookdale Tracy) — # BKD0325448-BKD0325480 (98-112 of 349)	Case Organization, Planning and Strategy
5/14/2020	Travis Close	1.0	\$850	\$850	Review/analysis of facility emails— “Adaline Kiehn” (ED, Brookdale Tracy) — # BKD0325480-BKD0325518 (112-128 of 349)	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/14/2020	Travis Close	0.7	\$850	\$595	continue facility ownership assignment (analysis of master leases	Case Organization, Planning and Strategy
5/14/2020	Travis Close	0.9	\$850	\$765	continue ownership memo assignment (intro, facility ownership summary)	Case Organization, Planning and Strategy
5/14/2020	Travis Close	0.7	\$850	\$595	Analyze examples of facility management agreements for financial incentives	Case Organization, Planning and Strategy
5/14/2020	Travis Close	0.9	\$850	\$765	continue drafting facility ownership memo (management agreements)	Case Organization, Planning and Strategy
5/14/2020	Travis Close	0.5	\$850	\$425	Analyze examples of master leases for financial incentives for owners	Case Organization, Planning and Strategy
5/14/2020	Travis Close	0.7	\$850	\$595	continue drafting facility ownership memo (master leases section)	Case Organization, Planning and Strategy
5/14/2020	Travis Close	1.3	\$850	\$1,105	Search for missing citations of building owners (Napa, Redwood City, Walnut, Windsor, Garden Grove))	Discovery (Non-Deposition)
5/14/2020	Travis Close	0.4	\$850	\$340	search building records received via subpoena for ownership info (Roseville facility)	Discovery (Non-Deposition)
5/15/2020	Rachel Steyer	5.5	\$750	\$4,125	continuing to review and edit declarations, intakes, correspondence withint our firm re creating new SP tracking site	Class Outreach and Contact
5/15/2020	Travis Close	1.5	\$850	\$1,275	Analyze master lease agreements for “additional rent” characteristics	Case Organization, Planning and Strategy
5/15/2020	Travis Close	1.5	\$850	\$1,275	Continue drafting ownerhship memo (lease agreement section)	Case Organization, Planning and Strategy
5/15/2020	Travis Close	0.3	\$850	\$255	review motion to consolidate, other recent filings in related case (Bright v. Brookdlae)	Case Organization, Planning and Strategy
5/15/2020	Travis Close	1.4	\$850	\$1,190	Continue drafting ownership memo (analysis of management agreement examples)	Case Organization, Planning and Strategy
5/15/2020	Travis Close	1.0	\$850	\$850	Review/analysis of facility emails— “Adaline Kiehn” (ED, Brookdale Tracy) — # BKD0325518-BKD0325518771 (128—143 of 349)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/15/2020	Travis Close	1.0	\$850	\$850	Review/analysis of facility emails— “Adaline Kiehn” (ED, Brookdale Tracy) — # BKD0325518771-BKD0325621- (143-157 of 349)	Discovery (Non-Deposition)
5/18/2020	Rachel Steyer	7.2	\$750	\$5,400	updating information into new Sharepoint site, correspondence within our firm, updating declarations, creating new draft declaration template, reviewing documents from class member	Class Outreach and Contact
5/18/2020	Travis Close	0.2	\$850	\$170	email to RLS re: class outreach acknowledgement form	Case Organization, Planning and Strategy
5/18/2020	Travis Close	1.0	\$850	\$850	Review/analysis of facility emails— “Adaline Kiehn” (ED, Brookdale Tracy) — # BKD0325621-BKD0325689 (157-174 of 349)	Discovery (Non-Deposition)
5/19/2020	Rachel Steyer	3.9	\$750	\$2,925	preparing editing and revising declaration template	Class Certification
5/19/2020	Rachel Steyer	2.1	\$750	\$1,575	updating and reviewing information in new sharepoint site	Class Outreach and Contact
5/19/2020	Rachel Steyer	1.5	\$750	\$1,125	correspondence within our firm, updating draft declarations, speaking with class member	Class Outreach and Contact
5/19/2020	Travis Close	1.2	\$850	\$1,020	continue drafting memo re: ownership facilities (ties between management/lease agreements)	Case Organization, Planning and Strategy
5/19/2020	Travis Close	1.7	\$850	\$1,445	continue drafting memo re: ownership of facilities (examples of reporting requirements from management/lease agreements)	Case Organization, Planning and Strategy
5/19/2020	Travis Close	0.5	\$850	\$425	review/edit RLS’s draft dec of yvonne rons	Class Outreach and Contact
5/19/2020	Travis Close	1.0	\$850	\$850	Review/analysis of facility emails— “Adaline Kiehn” (ED, Brookdale Tracy) — # BKD0325689-BKD0325742 (174-189 of 349)	Discovery (Non-Deposition)
5/19/2020	Travis Close	1.0	\$850	\$850	Review/analysis of facility emails— “Adaline Kiehn” (ED, Brookdale Tracy) — # BKD0325742-BKD0335223 (189-206 of 349)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/19/2020	Travis Close	0.3	\$850	\$255	Research expert disclosure requirements under rule 26(a) per email from opposing counsel	Pleadings and Motions Re: Pleadings
5/20/2020	Rachel Steyer	7.5	\$750	\$5,625	updating and editing declarations, correspondence with class members, reviewing client documents	Class Outreach and Contact
5/20/2020	Travis Close	1.2	\$850	\$1,020	Review/analysis of facility emails— “Adaline Kiehn” (ED, Brookdale Tracy) — # BKD0335223-BKD0335265 (206-222 of 349)	Discovery (Non-Deposition)
5/20/2020	Travis Close	0.3	\$850	\$255	Email to Tian re: physical inspection of docs from town of windsor	Discovery (Non-Deposition)
5/21/2020	Rachel Steyer	6.6	\$750	\$4,950	follow up conversation with class member, F/U call scheduled w/husband (POA); drafting and finalizing full declaration draft, sent to GBW, TCC, MTJ for review	Class Certification
5/21/2020	Rachel Steyer	0.2	\$750	\$150	email to TB re declaration update	Class Outreach and Contact
5/21/2020	Rachel Steyer	1.0	\$750	\$750	conducting final read through call with class member, making last minute changes and edits to final draft of declaration, sending out for signature	Class Outreach and Contact
5/21/2020	Travis Close	1.0	\$850	\$850	Review/analysis of facility emails— “Adaline Kiehn” (ED, Brookdale Tracy) — # BKD0335265-BKD03466781 (222-238 of 349)	Discovery (Non-Deposition)
5/22/2020	Rachel Steyer	2.5	\$750	\$1,875	drafting declaration	Class Certification
5/22/2020	Rachel Steyer	5.0	\$750	\$3,750	drafting and editing declaration for class member, conversation w/her to clarify and review details	Class Outreach and Contact
5/26/2020	Mark Johnson	0.2	\$1,150	\$230	meet and confer w OC Goodin and Riley re production of docs produced by third parties under subpoena	Discovery (Non-Deposition)
5/26/2020	Mark Johnson	0.5	\$1,150	\$575	coms (3) w/ RAB and TCC re status of production of third parrry docs pursuant to subpoena, reve memo re same draft email with instructions for bates numbering and format / scope of production.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/26/2020	Rachel Steyer	4.7	\$750	\$3,525	continuing to draft and edit class member declaration, follow up call with class member to verify/confirm details and information	Class Certification
5/26/2020	Rachel Steyer	2.7	\$750	\$2,025	drafting new class member declaration	Class Outreach and Contact
5/26/2020	Travis Close	0.5	\$850	\$425	analyze status of building records subpoenas received (which jurisdictions missing, format of docs, etc)	Discovery (Non-Deposition)
5/26/2020	Travis Close	0.2	\$850	\$170	Email to RAB re: building records productions received from third parties	Discovery (Non-Deposition)
5/26/2020	Travis Close	0.8	\$850	\$680	draft summary of third party productions for MTJ in prep for call with opposing counsel this afternoon	Discovery (Non-Deposition)
5/26/2020	Travis Close	0.3	\$850	\$255	Call with opposing counsel (MG, JR) and MTJ re: third party doc production	Discovery (Non-Deposition)
5/27/2020	Mark Johnson	0.1	\$1,150	\$115	email to SCC re calls w/ client S. Stiner, status of dreaft responses to discovery requests.	Discovery (Non-Deposition)
5/27/2020	Rachel Steyer	7.5	\$750	\$5,625	discussions with class memebtrs to clarify/review details for declarations, declaration drafting and editing	Class Certification
5/27/2020	Travis Close	0.6	\$850	\$510	Review/analysis of facility emails— “Adaline Kiehn” (ED, Brookdale Tracy) — # BKD0325742-BKD0347753 (189-196 of 349)	Case Organization, Planning and Strategy
5/27/2020	Travis Close	0.5	\$850	\$425	Review/analysis of facility emails— “Adaline Kiehn” (ED, Brookdale Tracy) — # BKD0347753-BKD0349048 (196-205 of 349)	Discovery (Non-Deposition)
5/27/2020	Travis Close	0.5	\$850	\$425	Analyze third party doc productions organized by RAB for producing to defendants later this week	Discovery (Non-Deposition)
5/27/2020	Travis Close	0.9	\$850	\$765	Update chart with attorney hours from 1/27 submission to compare to hours at fee submission	Other Motions
5/27/2020	Travis Close	1.8	\$850	\$1,530	continue updating chart by recalculating total hours billed for all firms between Jan 27 submission and fee motion submission; check against numbers in GBW declaration iso fees	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/28/2020	Mark Johnson	0.7	\$1,150	\$805	call w/ son of resident of Brookdale Rancho Mirage re access issues	Class Outreach and Contact
5/28/2020	Mark Johnson	0.4	\$1,150	\$460	call w/ Heretica rep and TCC re bids for work on analysis of residency agreements.	Experts (Including Retention)
5/28/2020	Rachel Steyer	7.1	\$750	\$5,325	drafting, reviewing, and editing class member declarations; correspondence with and conversations with class members to clarify information in draft declarations, set up times for intakes	Class Certification
5/28/2020	Travis Close	1.0	\$850	\$850	Review/analysis of facility emails— “Adaline Kiehn” (ED, Brookdale Tracy) — # BKD0349048-BKD0349084 (205-221 of 349)	Case Organization, Planning and Strategy
5/28/2020	Travis Close	0.3	\$850	\$255	email to RLS re: individual issue from class member re: room accessibility	Case Organization, Planning and Strategy
5/28/2020	Travis Close	1.0	\$850	\$850	Review/analysis of facility emails— “Adaline Kiehn” (ED, Brookdale Tracy) — # BKD0349084-BKD0349131 (221-236 of 349)	Case Organization, Planning and Strategy
5/28/2020	Travis Close	1.3	\$850	\$1,105	continue draft memo re ownership of facilities (analyzing master lease between BV holding and Fields senior living to determine ownership)	Case Organization, Planning and Strategy
5/28/2020	Travis Close	0.5	\$850	\$425	continue draft memo re ownership of facilities (master lease between Emeritus and MG tenant, LLC)	Case Organization, Planning and Strategy
5/28/2020	Travis Close	1.3	\$850	\$1,105	continue draft memo re ownership of facilities (master lease between Welltower and Emeritus; Master lease between Ventas and Summerville)	Case Organization, Planning and Strategy
5/28/2020	Travis Close	1.0	\$850	\$850	analyze Brookdale’s 2020 10-k to further explain ownership structure in memo	Case Organization, Planning and Strategy
5/28/2020	Travis Close	0.5	\$850	\$425	call w/ Michael Gildner (Heretik) & MTJ re: software/project for analyzing residency agreement database	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/28/2020	Travis Close	0.7	\$850	\$595	Analyze production compiled by RAB for completeness/accuracy, to be produced with Defendants	Discovery (Non-Deposition)
5/29/2020	Mark Johnson	0.5	\$1,150	\$575	call w/ son of absent class member re ADA issues at Brookdale Rancho Mirage, potential mtn for preliminary injunction	Class Outreach and Contact
5/29/2020	Mark Johnson	0.8	\$1,150	\$920	draft email to OC re proposed compromises on residency agreement dispute	Discovery (Non-Deposition)
5/29/2020	Mark Johnson	0.6	\$1,150	\$690	revise and finalize proposed stip re residency agreement dispute	Discovery (Non-Deposition)
5/29/2020	Mark Johnson	0.7	\$1,150	\$805	review CDSS and city/county docs for production to defendants; coms w/ /RAB re same and cove email to OC	Discovery (Non-Deposition)
5/29/2020	Mark Johnson	0.1	\$1,150	\$115	coms (x2) w/ experts or reps re retention for dec iso mtn to compel electronic PSS data	Experts (Including Retention)
5/29/2020	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re absent class member ADA issues and potential mtn for preliminary injunction	Other Motions
5/29/2020	Rachel Steyer	3.5	\$750	\$2,625	drafting declarations, editing and reviewing	Class Certification
5/29/2020	Rachel Steyer	2.6	\$750	\$1,950	intake call with class member, updating sharepoint	Class Outreach and Contact
5/29/2020	Travis Close	0.9	\$850	\$765	Review/analysis of facility emails— “Adaline Kiehn” (ED, Brookdale Tracy) — # BKD0349163-BKD0349197 (245-274 of 349)	Case Organization, Planning and Strategy
5/29/2020	Travis Close	1.1	\$850	\$935	Review/analysis of facility emails— “Adaline Kiehn” (ED, Brookdale Tracy) — # BKD0349197-BKD0349228 (274-305 of 349)	Case Organization, Planning and Strategy
5/29/2020	Travis Close	0.7	\$850	\$595	Legal reasearch on “pooling agreemnts” (SEC sources/ analysis of other real estate REITs) for memo re: facility ownership	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/29/2020	Travis Close	0.5	\$850	\$425	research re: recent HCP/Brookdale acquisitions, partnerships, & other investment activity for ownership memo	Case Organization, Planning and Strategy
5/29/2020	Travis Close	0.4	\$850	\$340	Analysis on quantity of CCRC agreements found in residency agreement database	Case Organization, Planning and Strategy
5/29/2020	Travis Close	1.7	\$850	\$1,445	analyze residency agreements in database to develop method of isolating complete residency agreements from non-agreements in database hosted on relativity	Case Organization, Planning and Strategy
5/29/2020	Travis Close	1.0	\$850	\$850	Review/analysis of facility emails— “Adaline Kiehn” (ED, Brookdale Tracy) — # BKD0349084-BKD0349163 (221-245 of 349)	Imported
5/29/2020	Travis Close	0.7	\$850	\$595	comments/edits on Dwight benson declaration (iso class certification) drafted by RLS	Other Motions
6/1/2020	Rachel Steyer	0.5	\$750	\$375	reviewing and drafting and editing declarations	Class Outreach and Contact
6/1/2020	Travis Close	1.0	\$850	\$850	Review/analysis of facility emails— “Adaline Kiehn” (ED, Brookdale Tracy) — # BKD0349228-BKD0349266 (305-326 of 349)	Case Organization, Planning and Strategy
6/1/2020	Travis Close	1.2	\$850	\$1,020	Research whether REIT owners are liable under ADA/state access discrimination laws as owners/operators	Case Organization, Planning and Strategy
6/1/2020	Travis Close	0.4	\$850	\$340	Review/analyze Brookdale’s 2020 10-k for revenues/net income, other financial info	Case Organization, Planning and Strategy
6/1/2020	Travis Close	0.7	\$850	\$595	edits/proofreading to facility ownership memo	Case Organization, Planning and Strategy
6/1/2020	Travis Close	0.5	\$850	\$425	analyze total number of unique facility owners in California following acquisitions/restructuring	Case Organization, Planning and Strategy
6/1/2020	Travis Close	0.8	\$850	\$680	continue revising memo re ownership of facilities (fill in missing owners - San Ramon, North Euclid)	Case Organization, Planning and Strategy
6/1/2020	Travis Close	0.7	\$850	\$595	continue revising memo re ownership of facilities (management fees / RIDEA structure)	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/1/2020	Travis Close	1.0	\$850	\$850	Review/analysis of facility emails— “Adaline Kiehn” (ED, Brookdale Tracy) — # BKD0349228-BKD0349266 (326-349 of 349)	Discovery (Non-Deposition)
6/2/2020	Mark Johnson	1.5	\$1,150	\$1,725	review of most recent docuemnt production from Ds, including docs re PSS system, P.E.A.R. reports.	Discovery (Non-Deposition)
6/2/2020	Mark Johnson	0.2	\$1,150	\$230	draft emai to COC re results review of latest D's production and thoughts on docs for staffing analysis.	Discovery (Non-Deposition)
6/2/2020	Mark Johnson	5.7	\$1,150	\$6,555	work on revised draft responses to RFPs for template, Stiner	Discovery (Non-Deposition)
6/2/2020	Mark Johnson	0.8	\$1,150	\$920	research /rue 34 obligation to produce documents already produced by D's or requiring analysis of documents produced by Ds	Discovery (Non-Deposition)
6/2/2020	Rachel Steyer	7.3	\$750	\$5,475	intake call with class members, final review calls with declarant, preparing and sending communications with class members, updating drafting, and reviewing declarations	Class Outreach and Contact
6/2/2020	Travis Close	0.7	\$850	\$595	finalize chart of facility owners	Case Management Conferences
6/2/2020	Travis Close	0.4	\$850	\$340	Analyze recent production re: DSS software, technical guides to determine sufficiency for expert use	Case Organization, Planning and Strategy
6/2/2020	Travis Close	0.8	\$850	\$680	continue drafting facility ownership memo (business entity timeline)	Case Organization, Planning and Strategy
6/2/2020	Travis Close	0.6	\$850	\$510	continue drafting facility ownership memo (adding citations and section references)	Case Organization, Planning and Strategy
6/2/2020	Travis Close	1.2	\$850	\$1,020	continue revising facility ownership memo (sections II-IV)	Case Organization, Planning and Strategy
6/2/2020	Travis Close	0.8	\$850	\$680	continue revising facility ownership memo (sections V-VI)	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/2/2020	Travis Close	1.0	\$850	\$850	Review/analysis of facility documents— “Melanie Washington” (ED, Brookdale Brookhurst) - # BKD0202554-BKD0202615 (1-16 of 318)	Discovery (Non-Deposition)
6/2/2020	Travis Close	1.0	\$850	\$850	Review/analysis of facility documents— “Melanie Washington” (ED, Brookdale Brookhurst) - # BKD0202615-BKD0202659 (16-31 of 318)	Discovery (Non-Deposition)
6/3/2020	Rachel Steyer	5.8	\$750	\$4,350	intake calls with class members, updating sharepoint, communications with clients, reviewing and editing declarations	Class Outreach and Contact
6/3/2020	Travis Close	1.9	\$850	\$1,615	Continue revising/finalizing facility ownership memo (update complete table of owners)	Case Organization, Planning and Strategy
6/3/2020	Travis Close	0.2	\$850	\$170	review/analyze memo from AX re: plaintiff’s recent experiences at brookdale scotts valley	Case Organization, Planning and Strategy
6/3/2020	Travis Close	1.4	\$850	\$1,190	finish revising facility ownership memo (complete all citations)	Case Organization, Planning and Strategy
6/3/2020	Travis Close	1.0	\$850	\$850	Review/analysis of facility documents— “Melanie Washington” (ED, Brookdale Brookhurst) - # BKD0202659-BKD0208372 (31-46 of 318)	Discovery (Non-Deposition)
6/3/2020	Travis Close	1.0	\$850	\$850	Review/analysis of facility documents— “Melanie Washington” (ED, Brookdale Brookhurst) - # BKD0208372-BKD0250885 (46-62) of 318)	Discovery (Non-Deposition)
6/4/2020	Guy Wallace	0.5	\$1,350	\$675	com's with GG; MTJ re discovery; motions to compel; analysis of Residency Agreements	Discovery (Non-Deposition)
6/4/2020	Mark Johnson	1.0	\$1,150	\$1,150	review and analysis of TCC memo re ownership / lease / management arrangments for all facilities.	Case Organization, Planning and Strategy
6/4/2020	Mark Johnson	0.5	\$1,150	\$575	email to TCC re ownership memo, follow up on same with research re operation/managment of faciliteis; citations to owner definition	Case Organization, Planning and Strategy
6/4/2020	Mark Johnson	0.4	\$1,150	\$460	com w/ GBW re ownership issue and evidency of Brookdale operation/managment of facilities	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/4/2020	Mark Johnson	0.5	\$1,150	\$575	research re lease/own/operate liaibity under ADA.	Class Certification
6/4/2020	Mark Johnson	0.1	\$1,150	\$115	com w/ OC re extension of time to respond to discovery	Discovery (Non-Deposition)
6/4/2020	Mark Johnson	0.3	\$1,150	\$345	email exchanges w/ COC BBK, SC, JY, AX re issues w/ communicating w. cleints for responses to discovery,seeking extension of deadline	Discovery (Non-Deposition)
6/4/2020	Mark Johnson	0.2	\$1,150	\$230	com w/ GBW re straegy for analysis of residency agreements	Discovery (Non-Deposition)
6/4/2020	Mark Johnson	0.7	\$1,150	\$805	confeence call w/ potential expert M. Curtin, Travis and AP rep re consultation as data expert.	Experts (Including Retention)
6/4/2020	Rachel Steyer	6.6	\$750	\$4,950	intakes with class members, updating sharepoint, drafting and editing delcaraitons	Class Outreach and Contact
6/4/2020	Travis Close	1.0	\$850	\$850	Review/analysis of facility documents— “Melanie Washington” (ED, Brookdale Brookhurst) - # BKD0250885-BKD0253866 (62-76 of 318)	Case Organization, Planning and Strategy
6/4/2020	Travis Close	0.9	\$850	\$765	Call w/ AP expert group & MTJ re: project for experts to opine on ability for defendants to produce resident assessment data in aggregate form	Case Organization, Planning and Strategy
6/4/2020	Travis Close	1.0	\$850	\$850	Review/analysis of facility documents— “Melanie Washington” (ED, Brookdale Brookhurst) - # BKD0253866-BKD0255168 (76-94 of 318)	Case Organization, Planning and Strategy
6/4/2020	Travis Close	0.2	\$850	\$170	Review/analyze email from MTJ re: strategy for further research into facility ownership	Case Organization, Planning and Strategy
6/4/2020	Travis Close	0.2	\$850	\$170	review/analyze email from BBK (co-counsel) re: request for extension on discovery	Case Organization, Planning and Strategy
6/4/2020	Travis Close	1.1	\$850	\$935	research 9th circuit definition of “operator” to confirm whether defendants qualify	Case Organization, Planning and Strategy
6/4/2020	Travis Close	0.8	\$850	\$680	begin outlining/researching new assignment re: operation of brookdale facilities	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/4/2020	Travis Close	1.7	\$850	\$1,445	Review/analyze Brookdale's 2019 annual report for info on extent/manner of operations	Case Organization, Planning and Strategy
6/4/2020	Travis Close	0.2	\$850	\$170	review email from BU (co-counsel) re: issues with plaintiff ralph schmidts' conservators	Pleadings and Motions Re: Pleadings
6/5/2020	Mark Johnson	0.7	\$1,150	\$805	call w/ TCC re doc review and analysis projects re residency agreements, search terms, custodiains	Case Organization, Planning and Strategy
6/5/2020	Travis Close	1.0	\$850	\$850	Review/analysis of facility documents— "Melanie Washington" (ED, Brookdale Brookhurst) - # BKD0255168-BKD0232356 (94-109 of 318)	Case Organization, Planning and Strategy
6/5/2020	Travis Close	1.0	\$850	\$850	Review/analysis of facility documents— "Melanie Washington" (ED, Brookdale Brookhurst) - # BKD0232356-BKD0234807 (109-126 of 318)	Case Organization, Planning and Strategy
6/5/2020	Travis Close	0.3	\$850	\$255	review recent correspondence between MTJ and co-counsel in related case re: obtaining expert for assessment data	Case Organization, Planning and Strategy
6/5/2020	Travis Close	1.4	\$850	\$1,190	Continue analyzing Brookdale's operations statements in recent SEC filings	Case Organization, Planning and Strategy
6/5/2020	Travis Close	0.8	\$850	\$680	Continue analyzing Brookdale's statements in recent SEC filings re: operations and management	Case Organization, Planning and Strategy
6/5/2020	Travis Close	0.8	\$850	\$680	call w/ MTJ re: strategy for ESI/custodians, motions to compel, and residency agreement assignment	Case Organization, Planning and Strategy
6/6/2020	Mark Johnson	0.6	\$1,150	\$690	call w/ RBGG attorneys and Brian re issue w/ response to Ds discovery	Discovery (Non-Deposition)
6/8/2020	Rachel Steyer	5.7	\$750	\$4,275	drafting, editing, finalizing declarations, communications with class members to set up intake times	Class Certification
6/8/2020	Rachel Steyer	0.2	\$750	\$150	brief conversation with class member, rescheduled intake for tomorrow, discussion re documents	Class Outreach and Contact
6/8/2020	Rachel Steyer	0.2	\$750	\$150	email to cocounsel at Stebner re forwarding client docs in advance of intake	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/8/2020	Rachel Steyer	0.4	\$750	\$300	conversation with BCR re declaration drafting update	Class Outreach and Contact
6/8/2020	Travis Close	0.9	\$850	\$765	Analyze residency agreement database to plan assignment for doc reviewers	Case Organization, Planning and Strategy
6/8/2020	Travis Close	1.6	\$850	\$1,360	Analyze/compare proposed custodians from Seyfarth, TCC, and RAB in	Case Organization, Planning and Strategy
6/8/2020	Travis Close	1.0	\$850	\$850	Review/analysis of facility documents— “Melanie Washington” (ED, Brookdale Brookhurst) - # BKD0234807-BKD0242017 (126-142 of 318)	Discovery (Non-Deposition)
6/8/2020	Travis Close	1.0	\$850	\$850	Review/analysis of facility documents— “Melanie Washington” (ED, Brookdale Brookhurst) - # BKD0242017-BKD0243188 (142-158 of 318)	Discovery (Non-Deposition)
6/8/2020	Travis Close	0.4	\$850	\$340	Email to JMP, EPO re: new residency agreement database assignment	Discovery (Non-Deposition)
6/8/2020	Travis Close	0.2	\$850	\$170	email to JMP re: residency agreement database analysis	Discovery (Non-Deposition)
6/9/2020	Guy Wallace	0.4	\$1,350	\$540	tc with GG re discovery issues and tasks	Discovery (Non-Deposition)
6/9/2020	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re motions to compel; revise and edit draft of MTC re ADA and any local policies or procedures	Other Motions
6/9/2020	Mark Johnson	1.3	\$1,150	\$1,495	review PSS instruction manual, PSP data and data diagram for coms w/ COC Marks and expert Curtin	Discovery (Non-Deposition)
6/9/2020	Mark Johnson	0.3	\$1,150	\$345	draft email to COC Marks re background docs for PSS data and scope of data needed for meet and confer w/ OC	Discovery (Non-Deposition)
6/9/2020	Mark Johnson	0.3	\$1,150	\$345	draft email to R. Stiner summarizing info needed for responses to Rogs and RFPs and prposing time for call	Discovery (Non-Deposition)
6/9/2020	Mark Johnson	0.1	\$1,150	\$115	email coms w/ OC re meet and confer on PSS data	Discovery (Non-Deposition)
6/9/2020	Mark Johnson	0.1	\$1,150	\$115	call w/ Curtin re expert capacity re assessment data	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/9/2020	Mark Johnson	1.7	\$1,150	\$1,955	revise letter brief on evac and transportaiton policies and add ADA policy issues.	Other Motions
6/9/2020	Rachel Steyer	3.2	\$750	\$2,400	outreach call with Wendy DeMello, updating sharepoint	Class Outreach and Contact
6/9/2020	Rachel Steyer	1.5	\$750	\$1,125	conversations with class members re claims, scheuldng intakes, editing draft declaration	Class Outreach and Contact
6/9/2020	Travis Close	1.1	\$850	\$935	Review/analysis of facility documents— “Melanie Washington” (ED, Brookdale Brookhurst) - # BKD0243188-BKD0249365 (158-173 of 318)	Case Organization, Planning and Strategy
6/9/2020	Travis Close	1.7	\$850	\$1,445	Analyze Ds proposed custodians to determine which to keep, which to remove, counter-propose, etc (#1-10)	Case Organization, Planning and Strategy
6/9/2020	Travis Close	1.4	\$850	\$1,190	Analyze Ds proposed custodians to determine which to keep, which to remove, counter-propose, etc (#11-20)	Case Organization, Planning and Strategy
6/9/2020	Travis Close	0.2	\$850	\$170	Email to MTJ re: Defs section of emergency evacuation letter brief	Case Organization, Planning and Strategy
6/9/2020	Travis Close	1.2	\$850	\$1,020	Review/analysis of facility documents— “Melanie Washington” (ED, Brookdale Brookhurst) - # BKD0249365-BKD0264545 (173-190 of 318)	Discovery (Non-Deposition)
6/10/2020	Mark Johnson	0.2	\$1,150	\$230	call w/ R Stiner re discovey responses and recent developments with Stacia	Discovery (Non-Deposition)
6/10/2020	Travis Close	1.0	\$850	\$850	Review/analysis of facility documents— “Melanie Washington” (ED, Brookdale Brookhurst) - # BKD0264545-BKD0264614 (190-206 of 318)	Case Organization, Planning and Strategy
6/10/2020	Travis Close	0.2	\$850	\$170	search for ESI stipulation between parties	Case Organization, Planning and Strategy
6/10/2020	Travis Close	0.3	\$850	\$255	Revise/edit MTJ’s draft of joint letter re: defendnats’ emergency evacuation and accessibility policies	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/10/2020	Travis Close	1.1	\$850	\$935	Continue analyzing Ds proposed custodians to determine which to keep/discard/counter (#21-25)	Case Organization, Planning and Strategy
6/10/2020	Travis Close	0.9	\$850	\$765	custodian analysis - review/analyze records of Laticia Higaes (HWD, Tracy) to determine if good choice for custodian	Case Organization, Planning and Strategy
6/10/2020	Travis Close	1.0	\$850	\$850	Continue analyzing Ds proposed custodians to determine which to keep/discard/counter (Ibo, Leslie - Millard, Steve)	Case Organization, Planning and Strategy
6/10/2020	Travis Close	0.6	\$850	\$510	analyze relevance of custodians from "District Director of Clinical Services" position	Case Organization, Planning and Strategy
6/10/2020	Travis Close	0.7	\$850	\$595	Finish analyzing Ds proposed custodians to determine which to keep/discard/counter (Navarra, Glorio-Toomer, Jeffrey)	Case Organization, Planning and Strategy
6/10/2020	Travis Close	0.9	\$850	\$765	Make recommendations for additional custodians	Case Organization, Planning and Strategy
6/10/2020	Travis Close	1.1	\$850	\$935	Review/analysis of facility documents— "Melanie Washington" (ED, Brookdale Brookhurst) - # BKD0264614-BKD0264675 (206-224 of 318)	Discovery (Non-Deposition)
6/11/2020	Guy Wallace	0.3	\$1,350	\$405	com's with Amy Xu; MTJ re Stacy Stiner and discovery responses	Discovery (Non-Deposition)
6/11/2020	Mark Johnson	2.7	\$1,150	\$3,105	review Stiner client docs, memo from AX re interviews; draft declaration in prep for call w/ Rita Stiner	Discovery (Non-Deposition)
6/11/2020	Mark Johnson	0.2	\$1,150	\$230	email exchanges w/ D Marks re PSS data, confidentiality acknowledgements	Discovery (Non-Deposition)
6/11/2020	Mark Johnson	0.2	\$1,150	\$230	email exchanges w/ AX, KS re docs received from Rita and Stacy Stiner, memo re interviews and draft declarations.	Discovery (Non-Deposition)
6/11/2020	Rachel Steyer	5.3	\$750	\$3,975	drafting and reviewing declarations for putative class members and/or represntatives	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/11/2020	Rachel Steyer	1.5	\$750	\$1,125	intake call with putative class member	Class Outreach and Contact
6/11/2020	Travis Close	1.0	\$850	\$850	Review/analysis of facility documents— “Melanie Washington” (ED, Brookdale Brookhurst) - # BKD0264675-BKD0264740 (224-241 of 318)	Case Organization, Planning and Strategy
6/11/2020	Travis Close	1.2	\$850	\$1,020	finish analysis of Ps additions/removals of Ds proposed custodians; prepare results in format for Defs and send to MTJ, GBW	Case Organization, Planning and Strategy
6/11/2020	Travis Close	0.6	\$850	\$510	review/edit RLS declaration of class member Burnell Felkner	Case Organization, Planning and Strategy
6/11/2020	Travis Close	1.5	\$850	\$1,275	research whether vitamins are medication, and the DSS regulations on central storage of medication at elder care facilities	Case Organization, Planning and Strategy
6/11/2020	Travis Close	0.3	\$850	\$255	email to JY (co-counsel) re Plaintiff’s issue at san ramon facility re: storage of vitamins	Case Organization, Planning and Strategy
6/11/2020	Travis Close	0.4	\$850	\$340	email to EPO re: answering questions on residency agreement review assignment	Case Organization, Planning and Strategy
6/11/2020	Travis Close	1.2	\$850	\$1,020	Review/analysis of facility documents— “Melanie Washington” (ED, Brookdale Brookhurst) - # BKD0264740-BKD0264811 (241-256 of 318)	Discovery (Non-Deposition)
6/12/2020	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re Stiner and status at Brookdale San Ramon; review and analysis of draft Xu Declaration re Stiner; D's recent document production	Discovery (Non-Deposition)
6/12/2020	Rachel Steyer	4.1	\$750	\$3,075	drafting declaration for wendy demello	Class Certification
6/15/2020	Mark Johnson	0.1	\$1,150	\$115	call w/ R Stiner re document production, interview	Discovery (Non-Deposition)
6/15/2020	Rachel Steyer	5.4	\$750	\$4,050	reviewing old intakes, considering/editing for declarations, declaration drafting	Class Certification
6/15/2020	Rachel Steyer	1.4	\$750	\$1,050	intake call with putative class member, creating client file and updating sharepoint	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/15/2020	Travis Close	0.2	\$850	\$170	Review example of D's PSS/PSA individual data file, and corresponding summary of related meet and confer call by MTJ	Discovery (Non-Deposition)
6/15/2020	Travis Close	1.0	\$850	\$850	Review/analysis of facility documents— "Melanie Washington" (ED, Brookdale Brookhurst) - # BKD0264811-BKD0264858 (256-271 of 318)	Discovery (Non-Deposition)
6/15/2020	Travis Close	0.9	\$850	\$765	Review/analysis of facility documents— "Melanie Washington" (ED, Brookdale Brookhurst) - # BKD0264858-BKD0264911 (271-289 of 318)	Discovery (Non-Deposition)
6/15/2020	Travis Close	0.4	\$850	\$340	review email from MTJ to expert re: PSS data & adequacy of arguments to Brookdale re: aggregation of data	Discovery (Non-Deposition)
6/15/2020	Travis Close	0.3	\$850	\$255	Review recent correspondence with co-counsel re: issues with plaintiff facing retaliation	Pleadings and Motions Re: Pleadings
6/16/2020	Mark Johnson	2.0	\$1,150	\$2,300	meeting w/ client's mother Rita Stiner re document availability and production, potential deposition, developments with clein	Discovery (Non-Deposition)
6/16/2020	Mark Johnson	1.5	\$1,150	\$1,725	travel to Rita Stiner's house for meeting, review and collection of documents	Discovery (Non-Deposition)
6/16/2020	Rachel Steyer	0.3	\$750	\$225	conversation with George Kawamoto from Stebner re putative class member + documents	Class Outreach and Contact
6/16/2020	Travis Close	1.0	\$850	\$850	Review/analysis of facility documents— "Melanie Washington" (ED, Brookdale Brookhurst) - # BKD0264911-BKD0267301 (289-301 of 318)	Case Organization, Planning and Strategy
6/16/2020	Travis Close	1.2	\$850	\$1,020	Review/analysis of facility documents— "Melanie Washington" (ED, Brookdale Brookhurst) - # BKD0267301-BKD0268224 (301-318 of 318)	Case Organization, Planning and Strategy
6/17/2020	Guy Wallace	0.5	\$1,350	\$675	review and analysis of draft MTC re local policies; memo re evacuation plan at Brookdale San Ramon; com's with MTJ; TCC re same	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/17/2020	Mark Johnson	1.7	\$1,150	\$1,955	review docs from Rita Stiner	Discovery (Non-Deposition)
6/17/2020	Mark Johnson	0.2	\$1,150	\$230	coms w/ GBW re memo from SR director re emergency manual, strategy for joint letter brief.	Discovery (Non-Deposition)
6/17/2020	Mark Johnson	0.3	\$1,150	\$345	additional revisions to joint ltr brief re policy docs incorporating arguments re Shawn Cull memo and emergency manual.	Other Motions
6/17/2020	Rachel Steyer	0.7	\$750	\$525	drafting class mmeber declaration	Class Certification
6/17/2020	Travis Close	1.1	\$850	\$935	Depo prep review/analysis - Monica De La Torre (Brookhurst) - # BKD0202496-BKD0202883 (1-15 of 128)	Case Organization, Planning and Strategy
6/17/2020	Travis Close	0.8	\$850	\$680	Analyze new DSS facility evaluation reports/complaints resulting in citations — (Alhambra-Folsom)	Case Organization, Planning and Strategy
6/17/2020	Travis Close	0.5	\$850	\$425	Analyze new DSS facility evaluation reports/complaints resulting in citations — (Folsom-North Tarzana)	Case Organization, Planning and Strategy
6/17/2020	Travis Close	0.6	\$850	\$510	Analyze new DSS facility evaluation reports/complaints resulting in citations — (North Tarzana-Santa Monica Gardens)	Case Organization, Planning and Strategy
6/17/2020	Travis Close	0.8	\$850	\$680	Analyze new DSS facility evaluation reports/complaints resulting in citations — (Santa Monica Gardens-Yorba Linda)	Case Organization, Planning and Strategy
6/17/2020	Travis Close	0.8	\$850	\$680	Edits to draft joint letter/MTC re: emergency evacuation and transportation policies	Case Organization, Planning and Strategy
6/17/2020	Travis Close	1.0	\$850	\$850	Depo prep review/analysis - Monica De La Torre (Brookhurst) - # BKD0202883-BKD0250774 (15-31 of 128)	Discovery (Non-Deposition)
6/18/2020	Guy Wallace	2.8	\$1,350	\$3,780	revise and edit MTCs re Residency Agreements and production of local facility policy documents	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/18/2020	Guy Wallace	1.3	\$1,350	\$1,755	revise and edit MTC complete production of Residency Agreements	Other Motions
6/18/2020	Mark Johnson	0.1	\$1,150	\$115	call w/ Toni re management of documents from Rita Stiner	Discovery (Non-Deposition)
6/18/2020	Mark Johnson	0.2	\$1,150	\$230	review revised GBW version of joint letter brief re production of residency agreements.	Discovery (Non-Deposition)
6/18/2020	Travis Close	1.5	\$850	\$1,275	Review/analyze Brookdale's 10-Q for quarter ending in 3-31-20 for operational statements & control	Case Organization, Planning and Strategy
6/18/2020	Travis Close	1.7	\$850	\$1,445	review/analyze management agreements produced by DSS to determine defendants' responsibility as owner	Case Organization, Planning and Strategy
6/18/2020	Travis Close	0.9	\$850	\$765	Continue review/analysis of management agreements produced by DSS to determine defendants' responsibility as owner	Case Organization, Planning and Strategy
6/18/2020	Travis Close	1.1	\$850	\$935	Depo prep review/analysis - Monica De La Torre (Brookhurst) - # BKD0250774-BKD0254963 (31-48 of 128)	Discovery (Non-Deposition)
6/18/2020	Travis Close	1.0	\$850	\$850	Depo prep review/analysis - Monica De La Torre (Brookhurst) - # BKD0254963-BKD0232814 (48-64 of 128)	Discovery (Non-Deposition)
6/19/2020	Guy Wallace	0.8	\$1,350	\$1,080	revise and edit MTC production of remaining Residency Agreements	Other Motions
6/22/2020	Guy Wallace	0.3	\$1,350	\$405	revise and edit motion to compel re Residency Agreements; com's with Maatman; MTJ re same	Other Motions
6/22/2020	Travis Close	1.0	\$850	\$850	Depo prep review/analysis - Monica De La Torre (Brookhurst) - # BKD0232814-BKD0235994 (64-80 of 128)	Case Organization, Planning and Strategy
6/22/2020	Travis Close	1.0	\$850	\$850	Depo prep review/analysis - Monica De La Torre (Brookhurst) - # BKD0235994-BKD0242049 (80-95 of 128)	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/22/2020	Travis Close	1.7	\$850	\$1,445	Analyze master lease agreements produced by DSS to determine defendants' responsibility as owner	Case Organization, Planning and Strategy
6/22/2020	Travis Close	0.9	\$850	\$765	Review/analyze Def's motion to dismiss filed in related case & mtn to strike class allegations (Gunza v. Brookdale)	Case Organization, Planning and Strategy
6/23/2020	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re further motions to compel; further extension of case schedule	Discovery (Non-Deposition)
6/23/2020	Guy Wallace	0.5	\$1,350	\$675	review and analysis of recent financial documents re Brookdale; com's with Regan re same	Discovery (Non-Deposition)
6/23/2020	Guy Wallace	0.4	\$1,350	\$540	review and analysis of draft discovery responses from AX re Jestrebek-Hart	Discovery (Non-Deposition)
6/23/2020	Guy Wallace	1.3	\$1,350	\$1,755	review and analysis of draft expert report from Waters re San Juan Capistrano facility	Experts (Including Retention)
6/23/2020	Rachel Steyer	6.0	\$750	\$4,500	drafting and editing class member declarations, conversation with class member to clarify and review specific details for declaratino draftgin	Class Certification
6/23/2020	Travis Close	1.0	\$850	\$850	Depo prep review/analysis - Monica De La Torre (Brookhurst) - # BKD0242049-BKD0262225 (95-111 of 128)	Case Organization, Planning and Strategy
6/23/2020	Travis Close	1.2	\$850	\$1,020	Depo prep review/analysis - Monica De La Torre (Brookhurst) - # BKD0262225-BKD0344662 (111-128 of 128)	Case Organization, Planning and Strategy
6/23/2020	Travis Close	0.4	\$850	\$340	Analyze 1st circuit ruling in related case (Biller, et al. v. Brookdale) re: arbitration clause enforcement in residency agreement	Case Organization, Planning and Strategy
6/23/2020	Travis Close	0.7	\$850	\$595	Analyze staff attorneys' progress on residency agreement database assignment	Case Organization, Planning and Strategy
6/23/2020	Travis Close	1.2	\$850	\$1,020	Analyze Brookdale press releases for statements re: operations (years 2014-2015)	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/24/2020	Guy Wallace	0.4	\$1,350	\$540	review and analysis of motions to compel that need to be filed; com's with GG; MTJ; TCC re same	Other Motions
6/24/2020	Mark Johnson	1.5	\$1,150	\$1,725	call with client re interrogatory responses	Discovery (Non-Deposition)
6/24/2020	Mark Johnson	0.7	\$1,150	\$805	coms w/ GBW and TCC re statusof ESI productions and demands; review prior motions, correspondence re same	Discovery (Non-Deposition)
6/24/2020	Rachel Steyer	5.6	\$750	\$4,200	drafting and editing class member declarations, communications with class members regarding declarations, setting up times to review material	Class Certification
6/24/2020	Travis Close	1.0	\$850	\$850	Depo prep review/analysis — Richard Flynn (ED, DDO) — # BKD0289891-BKD0320276 (1-14 of 227)	Case Organization, Planning and Strategy
6/24/2020	Travis Close	1.8	\$850	\$1,530	review/edit expert's (GW) draft inspection report for san juan capistrano facility	Case Organization, Planning and Strategy
6/24/2020	Travis Close	0.8	\$850	\$680	legal research re: date requirements for new construction/alterations under Title III of ADA	Case Organization, Planning and Strategy
6/24/2020	Travis Close	1.3	\$850	\$1,105	Draft/amend joint letter brief re: ESI collection	Case Organization, Planning and Strategy
6/24/2020	Travis Close	1.2	\$850	\$1,020	continue drafting/revising joint letter brief re: ESI collection	Case Organization, Planning and Strategy
6/24/2020	Travis Close	1.0	\$850	\$850	Depo prep review/analysis — Richard Flynn (ED, DDO) — # BKD0320276-BKD1121418 (14-32 of 227)	Discovery (Non-Deposition)
6/24/2020	Travis Close	0.3	\$850	\$255	Analyze latest inspection report on facilities inspected, noticed, not yet noticed, etc for GBW	Discovery (Non-Deposition)
6/24/2020	Travis Close	0.2	\$850	\$170	email to GBW re: history of Ps proposition of search terms for ESI	Discovery (Non-Deposition)
6/25/2020	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ re D's production of documents and data since March; need for discovery motion to set deadlines for production	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/25/2020	Guy Wallace	0.6	\$1,350	\$810	review and analysis of D's response re MTC re alleged local policies; coms' with MTJ; TCC re response thereto	Other Motions
6/25/2020	Rachel Steyer	4.0	\$750	\$3,000	drafting and editing class member declarations	Class Certification
6/25/2020	Rachel Steyer	3.6	\$750	\$2,700	Brookdale outreach: attempting calls to class members and/or responsible parties, leaving VMs, updating SP notes, scheduling intakes and follow up calls	Class Outreach and Contact
6/25/2020	Travis Close	1.4	\$850	\$1,190	Continue drafting motion to compel ESI production / joint letter brief	Case Organization, Planning and Strategy
6/25/2020	Travis Close	1.2	\$850	\$1,020	respond to Def's new argument in joint letter re: compelling production of emergency evac. documents	Case Organization, Planning and Strategy
6/25/2020	Travis Close	1.4	\$850	\$1,190	continue analyzing Brookdale press releases and news articles for info re: operational control (2015-2016)	Case Organization, Planning and Strategy
6/25/2020	Travis Close	0.8	\$850	\$680	continue analyzing Brookdale press releases and news articles for info re: operational control (2016-2017)	Case Organization, Planning and Strategy
6/25/2020	Travis Close	1.0	\$850	\$850	Depo prep review/analysis — Richard Flynn (ED, DDO) — # BKD1121418-BKD1124732 (32-48 of 227)	Discovery (Non-Deposition)
6/25/2020	Travis Close	1.1	\$850	\$935	Depo prep review/analysis — Richard Flynn (ED, DDO) — # BKD1124732-BKD1125186 (48-62 of 227)	Discovery (Non-Deposition)
6/26/2020	Guy Wallace	0.6	\$1,350	\$810	review and analysis of draft MTC re ESI; revise and edit same; com's with MTJ; TCC re same (.1)	Other Motions
6/26/2020	Rachel Steyer	1.4	\$750	\$1,050	intake call with class member, updated sharepoint, created client folder	Class Outreach and Contact
6/26/2020	Rachel Steyer	0.4	\$750	\$300	abbreviated intake call with class member, discussion re reviewing and verifying dates of Brookdale residency to ensure claims w/in class period, email, creating client folder and updating SP	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/26/2020	Rachel Steyer	0.3	\$750	\$225	corresponding with Brookdale team members to discuss outreach efforts	Class Outreach and Contact
6/26/2020	Travis Close	1.2	\$850	\$1,020	finish drafting amended joint letter brief re: ESI collection	Case Organization, Planning and Strategy
6/26/2020	Travis Close	0.2	\$850	\$170	Review/analyze MTJ's edits to updated joint letter brief re: emergency evacuation & transportation documents	Case Organization, Planning and Strategy
6/26/2020	Travis Close	1.0	\$850	\$850	Depo prep review/analysis — Richard Flynn (ED, DDO) — # BKD1125227-BKD1125284 (80-95 of 227)	Discovery (Non-Deposition)
6/26/2020	Travis Close	0.9	\$850	\$765	review/analyze draft responses to Ds ROGs by co-counsel (Plaintiff Boris)	Discovery (Non-Deposition)
6/29/2020	Rachel Steyer	0.4	\$750	\$300	continued intake with Rosemary Allen; she couldn't find certain documents and wanted to reschedule	Class Outreach and Contact
6/29/2020	Rachel Steyer	0.5	\$750	\$375	phone call w/Julissa and Kimberly to brief them on Brookdale outreach efforts, declaration drafting processes, and general information	Class Outreach and Contact
6/29/2020	Rachel Steyer	5.8	\$750	\$4,350	attempted class outreach, leaving VMs, scheduling follow up calls and intakes, answering questions and determining whether class members would be good candidates for intakes and declarations	Class Outreach and Contact
6/29/2020	Travis Close	1.0	\$850	\$850	Depo prep review/analysis — Richard Flynn (ED, DDO) — # BKD1125284-BKD1125330 (95-110 of 227)	Case Organization, Planning and Strategy
6/29/2020	Travis Close	1.1	\$850	\$935	Depo prep review/analysis — Richard Flynn (ED, DDO) — # BKD1125330- BKD1125391 (110-126 of 227)	Discovery (Non-Deposition)
6/30/2020	Guy Wallace	0.2	\$1,350	\$270	com's with MTJ re MTC re alleged local policy documents and review of same	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/30/2020	Rachel Steyer	0.5	\$750	\$375	partial intake for class member, rescheduled for end of month to discuss w/her sister whom she believes was the one who signed the residency agreement	Class Outreach and Contact
6/30/2020	Rachel Steyer	0.9	\$750	\$675	partial intake conducted with Rick Mayes, created client folder, updated sharepoint	Class Outreach and Contact
6/30/2020	Rachel Steyer	0.8	\$750	\$600	partial intake with Rick Isle, updated sharepoint to reflect updated contact info, email, created client folder	Class Outreach and Contact
6/30/2020	Rachel Steyer	5.3	\$750	\$3,975	attempted class outreach, leaving VMs, answering class members questions about the case, determining whether class members would make strong intakes/declarations, updating sharepoint	Class Outreach and Contact
6/30/2020	Travis Close	0.3	\$850	\$255	Review/analyze Ds' revised position re: emergency evacuation and transportation docs	Case Organization, Planning and Strategy
6/30/2020	Travis Close	0.2	\$850	\$170	review email from MTJ re: Ps final position on emergency evac/transport joint letter	Case Organization, Planning and Strategy
6/30/2020	Travis Close	0.8	\$850	\$680	review/analyze new complaint in case filed on behalf of shareholders alleging understaffing	Case Organization, Planning and Strategy
6/30/2020	Travis Close	1.0	\$850	\$850	Depo prep review/analysis — Richard Flynn (ED of Brookdale Tracy, DDO) — # BKD1125391-BKD1125434 (126-142 of 227)	Discovery (Non-Deposition)
6/30/2020	Travis Close	1.0	\$850	\$850	Depo prep review/analysis — Richard Flynn (ED of Brookdale Tracy, DDO) — # BKD1125434-BKD1125476 (142-159 of 227)	Discovery (Non-Deposition)
7/1/2020	Guy Wallace	0.3	\$1,350	\$405	com's with BBK re draft Interrogatory Answers; review and analysis of same	Discovery (Non-Deposition)
7/1/2020	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of D's portion of MTC re Residency Agreements; revise and edit same; com's with Maatman; MTJ re same (.3)	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/1/2020	Mark Johnson	0.2	\$1,150	\$230	calls w/ GBW re strategy for responding to D's claim of untimeliness on motion to compel residency agreements	Discovery (Non-Deposition)
7/1/2020	Mark Johnson	0.1	\$1,150	\$115	review D's proposed changes to joint discovery ltr re residency agreements and email exchanges re same	Discovery (Non-Deposition)
7/1/2020	Rachel Steyer	1.4	\$750	\$1,050	training call with TSJ re Brookdale outreach	Class Outreach and Contact
7/1/2020	Rachel Steyer	2.0	\$750	\$1,500	intake w/Charlotte Paulsen, creating client folder, updating sharepoint	Class Outreach and Contact
7/1/2020	Rachel Steyer	0.6	\$750	\$450	partial intake with David Birch; continued while he could compile and then email docs w/billing history	Class Outreach and Contact
7/1/2020	Rachel Steyer	0.3	\$750	\$225	email w/Kimberly and Julissa re outreach questions	Class Outreach and Contact
7/1/2020	Travis Close	1.0	\$850	\$850	Depo prep review/analysis — Richard Flynn (ED of Brookdale Tracy, DDO) — # BKD1125476-BKD1125534 (159-178 of 227)	Case Organization, Planning and Strategy
7/1/2020	Travis Close	1.1	\$850	\$935	Depo prep review/analysis — Richard Flynn (ED of Brookdale Tracy, DDO) — # BKD1125534-BKD1125586 (178-193 of 227)	Case Organization, Planning and Strategy
7/1/2020	Travis Close	0.4	\$850	\$340	review/analyze co-counsel's edits to draft answers to Ds Interrogatories (Plf Bernie Jest-hart)	Case Organization, Planning and Strategy
7/1/2020	Travis Close	1.1	\$850	\$935	continue analyzing Brookdale press releases and news articles for info re: operational control (2017-2018)	Discovery (Non-Deposition)
7/1/2020	Travis Close	0.1	\$850	\$85	review court's order re: joint letter discovery dispute	Other Motions
7/2/2020	Guy Wallace	0.4	\$1,350	\$540	review and analysis of draft responses to D.'s interrogatories to named P.'s	Discovery (Non-Deposition)
7/2/2020	Guy Wallace	0.7	\$1,350	\$945	review and analysis of Defendants' further redline of MTC re Residency Agreements; revise and edit P's portion of letter brief; com's with GM; MTJ re same (.2)	Other Motions
7/2/2020	Rachel Steyer	2.6	\$750	\$1,950	drafting class member delcaration	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/2/2020	Rachel Steyer	1.1	\$750	\$825	partial intake w/david boyd, creating client folder, updating sharepoint	Class Outreach and Contact
7/2/2020	Rachel Steyer	2.4	\$750	\$1,800	attempted outreach and contact with class members, leaving VMs, scheduling and rescheudling intake calls, answering questions, updating sharepoint, assessing class member claims	Class Outreach and Contact
7/2/2020	Rachel Steyer	1.6	\$750	\$1,200	continued intake call w/David Birch, updating intake based on docs received related to billing rates	Class Outreach and Contact
7/2/2020	Travis Close	1.0	\$850	\$850	Depo prep review/analysis — Richard Flynn (ED of Brookdale Tracy, DDO) — # BKD1125586-BKD1125638 (193-211 of 227)	Case Organization, Planning and Strategy
7/2/2020	Travis Close	1.3	\$850	\$1,105	continue analyzing Brookdale press releases and news articles for info re: operational control (2018-2019)	Case Organization, Planning and Strategy
7/2/2020	Travis Close	1.2	\$850	\$1,020	continue analyzing Brookdale press releases and news articles for info re: operational control (2019-2020)	Case Organization, Planning and Strategy
7/2/2020	Travis Close	1.3	\$850	\$1,105	legal research re: whether operator non-owners are liable under ADA	Case Organization, Planning and Strategy
7/2/2020	Travis Close	0.9	\$850	\$765	legal research re: cases where healthcare REITs are found liable under ADA or other civil rights statutes	Case Organization, Planning and Strategy
7/2/2020	Travis Close	1.2	\$850	\$1,020	Depo prep review/analysis — Richard Flynn (ED of Brookdale Tracy, DDO) — # BKD1125638-BKD1151967 (193-211 of 227)	Discovery (Non-Deposition)
7/6/2020	Guy Wallace	0.2	\$1,350	\$270	com's with AX; MTJ re preparation of P's responses to D's interrogatories and timing re same	Discovery (Non-Deposition)
7/6/2020	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re MJ Beeler's Order re P's motion to compel alleged local policies re ADA compliance; potential discovery conference re same; MTC re Residency Agreements	Other Motions
7/6/2020	Mark Johnson	0.1	\$1,150	\$115	email to G Maatman re follow up on assessment data production.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/6/2020	Mark Johnson	1.6	\$1,150	\$1,840	revise and add to draft ltr brief to compel ESI production and/or meet and confer.re same; review meet and confer correspondence and timeline for same.	Other Motions
7/6/2020	Mark Johnson	0.4	\$1,150	\$460	com w/ GBW re strategy for mtn to compel ESI or alternative approach of demandng production based on P's search terms.	Other Motions
7/6/2020	Mark Johnson	0.2	\$1,150	\$230	com w GBW re seeking discovery conference w/ court re policy documents and other discovery issues.	Other Motions
7/6/2020	Rachel Steyer	1.8	\$750	\$1,350	drafting and editing class member declaration	Class Certification
7/6/2020	Rachel Steyer	0.3	\$750	\$225	email to TB re dividing up outreach calls	Class Outreach and Contact
7/6/2020	Rachel Steyer	1.6	\$750	\$1,200	intake call w/class member Alan Krug, creating client folder, updating sharepoint	Class Outreach and Contact
7/6/2020	Rachel Steyer	0.2	\$750	\$150	returned phone call from class member, learning about basic issues w/mother's care at Brookdale, setting up time for intake	Class Outreach and Contact
7/6/2020	Travis Close	0.5	\$850	\$425	analyze proposed custodians for likely deponents to continue depo prep	Case Organization, Planning and Strategy
7/6/2020	Travis Close	1.0	\$850	\$850	review/analysis of proposed custodians — Kevin Bowman (Regional Vice President), Helen Borsting (Nurse, RN) - # BKD0238712-BKD048253 (1-13 of 13)	Case Organization, Planning and Strategy
7/6/2020	Travis Close	1.1	\$850	\$935	review/analysis of proposed custodians - Sharyl Ronan (Regional Director of Operations) - # BKD0106921-BKD0151693 (1-16 of 59)	Case Organization, Planning and Strategy
7/7/2020	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ re discovery issues and need for discovery conference with MJ Beeler	Discovery (Non-Deposition)
7/7/2020	Mark Johnson	0.2	\$1,150	\$230	com w/ GBW re ESI production and strategy for follow up demands, search terms and potential motion to compel	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/7/2020	Mark Johnson	0.2	\$1,150	\$230	com w/ COC GCG re request for extension of time to respondi to written discovery; proposed modification of schedule, plan for seeking ESI	Discovery (Non-Deposition)
7/7/2020	Mark Johnson	2.7	\$1,150	\$3,105	research and analyze prior meet and confer correspondence and court submissions re ESI production; review draft proposed search terms and custodian analysis; formulate strategy for further pursuit of ESI	Discovery (Non-Deposition)
7/7/2020	Mark Johnson	0.4	\$1,150	\$460	draft memo to team re status of ESI production and strategy for further pursuit of same, search terms to be used.	Discovery (Non-Deposition)
7/7/2020	Rachel Steyer	1.0	\$750	\$750	partial intake call w/class member, creating client folder, updating sharepoint	Class Outreach and Contact
7/7/2020	Rachel Steyer	0.2	\$750	\$150	responding to email threads with GWB and TB separately re outreach efforts and questions	Class Outreach and Contact
7/7/2020	Rachel Steyer	1.5	\$750	\$1,125	intake call with class member Ray Voorhis	Class Outreach and Contact
7/7/2020	Rachel Steyer	0.3	\$750	\$225	emails w/Brookdale outreach team answering questions	Class Outreach and Contact
7/7/2020	Travis Close	1.0	\$850	\$850	review/analysis of proposed custodians - Sharyl Ronan (Regional Director of Operations) - # BKD0151693-BKD0165864 (16-38 of 59)	Discovery (Non-Deposition)
7/7/2020	Travis Close	1.1	\$850	\$935	review/analysis of proposed custodians - Sharyl Ronan (Regional Director of Operations) - # BKD0165864-BKD0239633 (38-59 of 59)	Discovery (Non-Deposition)
7/8/2020	Guy Wallace	0.2	\$1,350	\$270	com's with GG; RLS re class outreach and potential declarants	Class Certification
7/8/2020	Mark Johnson	0.3	\$1,150	\$345	com w/RAB re document management status, review of residency agreements.	Discovery (Non-Deposition)
7/8/2020	Mark Johnson	0.3	\$1,150	\$345	review of document management reports	Discovery (Non-Deposition)
7/8/2020	Rachel Steyer	1.0	\$750	\$750	drafting class member declaration	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/8/2020	Rachel Steyer	0.4	\$750	\$300	reorganizing and updating new sharepoint assignments	Class Outreach and Contact
7/8/2020	Rachel Steyer	0.7	\$750	\$525	partial intake conducted with class member--decided not to complete because his mother only resided in assisted living for less than three weeks, updating and filling in certain categories of intake, updating sharepoint, creating client folder	Class Outreach and Contact
7/8/2020	Rachel Steyer	0.2	\$750	\$150	email communciation w/TSJ and TRB re outreach questions	Class Outreach and Contact
7/8/2020	Rachel Steyer	1.9	\$750	\$1,425	completing intake with class member, sending email with contact information, creating client folder, updating sharepoint	Class Outreach and Contact
7/8/2020	Rachel Steyer	1.1	\$750	\$825	condcuting intake w/class member, updating sharepoint, creating client folder	Class Outreach and Contact
7/8/2020	Travis Close	1.0	\$850	\$850	review/analysis of proposed custodians — Danielle Acacio, Monica Aguirre - Brookhurst - # BKD0251636- BKD0239593 (1-14 of 43)	Case Organization, Planning and Strategy
7/8/2020	Travis Close	1.0	\$850	\$850	review/analysis of proposed custodians — Danielle Acacio, Monica Aguirre - Brookhurst - # BKD0239593- BKD0263860 (14-32 of 43)	Case Organization, Planning and Strategy
7/8/2020	Travis Close	0.8	\$850	\$680	review/analysis of proposed custodians — Danielle Acacio, Monica Aguirre - Brookhurst - # BKD0263860- (32-43 of 43)	Case Organization, Planning and Strategy
7/9/2020	Mark Johnson	0.4	\$1,150	\$460	coms w/ GBW, R Steyer re communications w/ putative class members; providing copies of form letter seeking contact with putativfe class members	Class Outreach and Contact
7/9/2020	Mark Johnson	3.2	\$1,150	\$3,680	draft demand letter to OC re ESI production,custodians, and search terms. review TCC edits re same and list of additional custodians	Discovery (Non-Deposition)
7/9/2020	Rachel Steyer	1.6	\$750	\$1,200	drafting and editing class member declaration	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/9/2020	Rachel Steyer	0.2	\$750	\$150	communications with TSJ, GBW, MTJ re policies to have in place regarding sending formal communications with class members via email	Class Outreach and Contact
7/9/2020	Rachel Steyer	2.4	\$750	\$1,800	intake call with class member, updating sharepoint, creating client folder, sending email so she can provide records	Class Outreach and Contact
7/9/2020	Rachel Steyer	0.5	\$750	\$375	correspondence btwn GBW and MTJ regarding class outreach and email correspondence with class members, specifically concerning distributing mailing notice	Class Outreach and Contact
7/9/2020	Rachel Steyer	0.5	\$750	\$375	follow up call/conversation with Neil Gehrke, answered additional quesitons about the case, determined that he would be willing and interested to conduct intake, setting up time to speak	Class Outreach and Contact
7/9/2020	Rachel Steyer	1.5	\$750	\$1,125	finished conducting remainder of intake w/Alan Evans	Class Outreach and Contact
7/9/2020	Rachel Steyer	0.4	\$750	\$300	partial intake w/class member, decided to reschedule so she could locate her files/records to better inform conversation; updated sharepoint address which was incorrect, created client folder	Class Outreach and Contact
7/9/2020	Rachel Steyer	0.5	\$750	\$375	reviewing and analyzing intake from KDL to determine whether she should proceed forward with drafting a declaration (specific issue whether declarant would want to file her own suit), correspondence with KDL and GBW explaining the underlying allegations, whether alleged negligence could be attributed to understaffing	Class Outreach and Contact
7/9/2020	Rachel Steyer	0.9	\$750	\$675	listening to VMs from missed calls, reviewing sharepoint to determine which class members I needed to follow up with after earlier conversations, attempted calls, leaving VMs, scheduling intakes	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/9/2020	Travis Close	1.0	\$850	\$850	review/analysis of proposed custodians — Danielle Acacio, Monica Aguirre - Brookhurst # BKD0263860-BKD1121334 (32-43 of 43)	Case Organization, Planning and Strategy
7/9/2020	Travis Close	1.0	\$850	\$850	review/analysis of proposed custodians — Wanda Franks (BOM, Brookdale Tracy) - # BKD0277462-BKD0308840 (1-17 of 39)	Case Organization, Planning and Strategy
7/9/2020	Travis Close	1.3	\$850	\$1,105	edits to MTJ's draft letter re: ESI/custodians and propose 10 additional custodians	Case Organization, Planning and Strategy
7/10/2020	Guy Wallace	0.3	\$1,350	\$405	review and analysis of com's with Maatman; MTJ re discovery conference; P's request for same	Discovery (Non-Deposition)
7/10/2020	Mark Johnson	0.1	\$1,150	\$115	call w/ GBW re request for discovery conference with court.	Discovery (Non-Deposition)
7/10/2020	Rachel Steyer	1.3	\$750	\$975	follow up call with Carrie Biggs-Adams to review and clarify details in her draft declaration	Class Certification
7/10/2020	Rachel Steyer	1.9	\$750	\$1,425	partial intake with Sandy James & Keith Morgan, her cell phone died so left VM and am awaiting call back, updating sharepoint, creating client file	Class Outreach and Contact
7/10/2020	Rachel Steyer	0.8	\$750	\$600	finishing up intake with Keith Morgan and Sandy James, updating sharepoint	Class Outreach and Contact
7/10/2020	Rachel Steyer	1.5	\$750	\$1,125	intake call w/Katie Buchanan	Class Outreach and Contact
7/10/2020	Rachel Steyer	0.2	\$750	\$150	answering question from KDL related to how to respond to specific issue raised by class member responsible party	Class Outreach and Contact
7/10/2020	Rachel Steyer	0.2	\$750	\$150	prepared intake for scheduled call, left VM	Class Outreach and Contact
7/10/2020	Rachel Steyer	1.0	\$750	\$750	conducting follow up calls w/class members based on review yesterday of sharepoint notes, missed calls, scheduling continued intakes, updating sharepoint, leaving VMs	Class Outreach and Contact
7/10/2020	Rachel Steyer	0.5	\$750	\$375	document review and updating class member's intake based on docs received (verifying figures, dates, etc)	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/10/2020	Travis Close	1.2	\$850	\$1,020	Eidler - review/analysis of proposed custodians — Wanda Franks (BOM, Brookdale Tracy) - # BKD0308840-BKD1151691 (17-39 of 39)	Case Organization, Planning and Strategy
7/10/2020	Travis Close	0.2	\$850	\$170	review recent correspondence re: letters sent to sample of class member	Class Outreach and Contact
7/10/2020	Travis Close	1.0	\$850	\$850	review/analysis of proposed custodians — Sheila Garner (VP, Senior Regional Operations), Tonya Glass, Roxanne Gooding, Leticia Higaes # BKD0157754-BKD0289410 (1-17 of 360) 12:30	Discovery (Non-Deposition)
7/13/2020	Guy Wallace	0.2	\$1,350	\$270	com's with MTJ re discovery issues and further meet and confer with Maatman	Discovery (Non-Deposition)
7/13/2020	Mark Johnson	0.1	\$1,150	\$115	call w/ GBW re meet and confer w/ OC re case schedule, possible plan re resumption of schedule.	Discovery (Non-Deposition)
7/13/2020	Mark Johnson	0.4	\$1,150	\$460	email exchanges w/ SC (x2) and LEC (x2) re Stiner responses to rogs and document requests, preservation of texts and re managment and printing of draf rog responses	Discovery (Non-Deposition)
7/13/2020	Rachel Steyer	2.7	\$750	\$2,025	drafting and editing class member declaration	Class Certification
7/13/2020	Rachel Steyer	0.7	\$750	\$525	final read through of draft declaration w/Holly Lou Stroom; updating notes in Sharepoint	Class Certification
7/13/2020	Rachel Steyer	0.2	\$750	\$150	reviewing sharepoint notes and intakes to determine which completed intakes to draft declarations	Class Outreach and Contact
7/13/2020	Rachel Steyer	1.3	\$750	\$975	partial intake with class member, updating sharepoint, scheduling continued intake time to complete	Class Outreach and Contact
7/13/2020	Travis Close	1.0	\$850	\$850	review/analysis of proposed custodians — Sheila Garner (VP, Senior Regional Operations), Tonya Glass, Roxanne Gooding, Leticia Higaes # BKD0289410-KD0308857 (17-36 of 360)	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/13/2020	Travis Close	0.5	\$850	\$425	edits to draft declaration of Holly Lou by RLS	Case Organization, Planning and Strategy
7/13/2020	Travis Close	1.2	\$850	\$1,020	legal research re: meaning of “operate” under Title III of ADA	Case Organization, Planning and Strategy
7/13/2020	Travis Close	1.2	\$850	\$1,020	review/analysis of proposed custodians — Sheila Garner (VP, Senior Regional Operations), Tonya Glass, Roxanne Gooding, Leticia Higaes # KD0308857-BKD0316329 (36-53 of 360)	Discovery (Non-Deposition)
7/14/2020	Rachel Steyer	0.8	\$750	\$600	intake call w/class member, creating client folder, updating sharepoint	Class Outreach and Contact
7/14/2020	Rachel Steyer	0.8	\$750	\$600	partial intake conducted w/class member, created client folder, scheudled remainder of intake	Class Outreach and Contact
7/14/2020	Rachel Steyer	3.5	\$750	\$2,625	follow up calls (from missed ones or VMs), answering questions about the case w/class members, setting up intakes, determining which class members have strong claims, updating sharepoint	Class Outreach and Contact
7/14/2020	Travis Close	1.1	\$850	\$935	review/analysis of proposed custodians — Sheila Garner (VP, Senior Regional Operations), Tonya Glass, Roxanne Gooding, Leticia Higaes # BKD0318030-BKD0318064 (69-86 of 360)	Case Organization, Planning and Strategy
7/14/2020	Travis Close	0.5	\$850	\$425	edits/suggestions to draft Ray Voorhis declaration by RLS	Case Organization, Planning and Strategy
7/14/2020	Travis Close	0.5	\$850	\$425	edits to draft RLS declaration of Charlotte Paulsen	Class Outreach and Contact
7/14/2020	Travis Close	1.2	\$850	\$1,020	review/analysis of proposed custodians — Sheila Garner (VP, Senior Regional Operations), Tonya Glass, Roxanne Gooding, Leticia Higaes # BKD0316329-BKD0318030 (53-69 of 360)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/14/2020	Travis Close	1.0	\$850	\$850	review/analysis of proposed custodians — Sheila Garner (VP, Senior Regional Operations), Tonya Glass, Roxanne Gooding, Leticia Higaes # BBKD0318064-BKD0325358 (86-103 of 360)	Discovery (Non-Deposition)
7/15/2020	Mark Johnson	0.4	\$1,150	\$460	coms w/ Justin, Ryan re analysis of residency agreements and findings, progress on review of same	Discovery (Non-Deposition)
7/15/2020	Rachel Steyer	1.5	\$750	\$1,125	completed intake w/class member, updated Sharepoint	Class Outreach and Contact
7/15/2020	Rachel Steyer	2.0	\$750	\$1,500	intake call w/class member, creating client folder, updating sharepoint	Class Outreach and Contact
7/15/2020	Rachel Steyer	0.4	\$750	\$300	completed intake call w/class member, updating sharepoint	Class Outreach and Contact
7/15/2020	Rachel Steyer	2.8	\$750	\$2,100	class outreach--speaking with class members and/or family members about the lawsuit, determining whether they would be good candidates for intakes and declarations, setting up intakes, listening to and returning VMs	Class Outreach and Contact
7/15/2020	Travis Close	1.1	\$850	\$935	review/analysis of proposed custodians — Sheila Garner (VP, Senior Regional Operations), Tonya Glass, Roxanne Gooding, Leticia Higaes # BKD0325358-BKD0335302 (103-119 of 360)	Case Organization, Planning and Strategy
7/15/2020	Travis Close	1.1	\$850	\$935	review/analysis of proposed custodians — Sheila Garner (VP, Senior Regional Operations), Tonya Glass, Roxanne Gooding, Leticia Higaes # BKD0335302-BKD1120542 (119-136 of 360)	Case Organization, Planning and Strategy
7/15/2020	Travis Close	1.0	\$850	\$850	review/analysis of proposed custodians — Sheila Garner (VP, Senior Regional Operations), Tonya Glass, Roxanne Gooding, Leticia Higaes # BKD1120542-BKD1125105 (136-155 of 360)	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/15/2020	Travis Close	0.6	\$850	\$510	review/revise draft declaration of Audrey Licciardo by RLS	Class Outreach and Contact
7/15/2020	Travis Close	0.5	\$850	\$425	review/revise draft declaration of Audrey Licciardo by RLS	Class Outreach and Contact
7/16/2020	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ re status of discovery and non-produced materials; meet and confer with Maatman re same; case schedule	Discovery (Non-Deposition)
7/16/2020	Rachel Steyer	0.6	\$750	\$450	editing TSJ draft declarations	Class Certification
7/16/2020	Rachel Steyer	0.6	\$750	\$450	email to TSJ regarding my notes and thoughts about improvements to declaration drafting	Class Certification
7/16/2020	Rachel Steyer	0.2	\$750	\$150	email question to GBW, MTJ, TCC related to whether or not to draft a declaration based on PoA issues/who signed K	Class Certification
7/16/2020	Rachel Steyer	1.2	\$750	\$900	intake call w/class member, creating client folder, updating sharepoint	Class Outreach and Contact
7/16/2020	Rachel Steyer	0.5	\$750	\$375	conversation with Barbara Leis, sister of Ann Mauro, intake I conducted yesterday--discussed and reviewed a lot of the intricacies related to their family's set up as it relates to their mother's care, reviewed a few questions and updated intake	Class Outreach and Contact
7/16/2020	Rachel Steyer	0.7	\$750	\$525	partial intake with class member, we agreed to reschedule so she could take a few days to go through her files/records, creating client folder, updating sharepoint	Class Outreach and Contact
7/16/2020	Rachel Steyer	1.7	\$750	\$1,275	phone calls with class members about the litigation, answering questions, setting up intakes, assessing strength of claims, returning calls, listening to VMs	Class Outreach and Contact
7/16/2020	Travis Close	0.3	\$850	\$255	analysis of declaration issue (brought up by RLS) of declaration lacking power of attorney/not signing docs	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/16/2020	Travis Close	1.2	\$850	\$1,020	review/analysis of proposed custodians — Sheila Garner (VP, Senior Regional Operations), Tonya Glass, Roxanne Gooding, Leticia Higaes # BKD1125105-BKD1125206 (155-171 of 360)	Discovery (Non-Deposition)
7/16/2020	Travis Close	1.0	\$850	\$850	review/analysis of proposed custodians — Sheila Garner (VP, Senior Regional Operations), Tonya Glass, Roxanne Gooding, Leticia Higaes # BKD1125206-BKD1125324 (171-187 of 360)	Discovery (Non-Deposition)
7/16/2020	Travis Close	1.0	\$850	\$850	review/analysis of proposed custodians — Sheila Garner (VP, Senior Regional Operations), Tonya Glass, Roxanne Gooding, Leticia Higaes # BKD1125324-BKD1125438 (187-204 of 360)	Discovery (Non-Deposition)
7/17/2020	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re meet and confer with D's re various discovery issues and case schedule	Discovery (Non-Deposition)
7/17/2020	Mark Johnson	0.6	\$1,150	\$690	meet and confer w/ OC (GM+ 5 others) re discovery status conference, timing of policy documen production, overall lschedule	Case Management Conferences
7/17/2020	Mark Johnson	0.2	\$1,150	\$230	follow up call w/ COC GCG re discovery status conference, meet and confer w/ OC and status of rog and document request discovery	Case Organization, Planning and Strategy
7/17/2020	Mark Johnson	0.6	\$1,150	\$690	prep for meet and confer w/ OC re discovery status conference issues, outstanding discovery and possible changes to schedule, including review of past meet and confer notes, discovery status memos	Discovery (Non-Deposition)
7/17/2020	Mark Johnson	0.5	\$1,150	\$575	com w/ GBW re briefing on meet and confer session w/ OC; strategy for discovery status conference, written statement for same, motions to compel	Discovery (Non-Deposition)
7/17/2020	Mark Johnson	1.3	\$1,150	\$1,495	revise response to ex parte application to extend deadlines, with input from GBW and CJH; finalize and arrange for filing with declaration	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/17/2020	Rachel Steyer	0.6	\$750	\$450	editing revised draft declaration from TSJ	Class Certification
7/17/2020	Rachel Steyer	0.6	\$750	\$450	partial intake with class member, determined ultimately not to go through w/intake bc she had rather positive views about Brookdale and wasn't poa	Class Outreach and Contact
7/17/2020	Rachel Steyer	0.5	\$750	\$375	call w/class member, decided not to conduct intake because family member only resided at Brookdale for short period of time, not strong claims	Class Outreach and Contact
7/17/2020	Rachel Steyer	1.0	\$750	\$750	partial intake w/class member, updating sharepoint, creating client folder	Class Outreach and Contact
7/17/2020	Rachel Steyer	0.8	\$750	\$600	listening to VMs, call backs, scheduling intakes, answering questions	Class Outreach and Contact
7/17/2020	Rachel Steyer	0.3	\$750	\$225	communications with KDL re how to handle unwanted contact from class members	Misc. Research
7/17/2020	Travis Close	0.7	\$850	\$595	meet and confer call with defendants re: ESI, accessibility/transportation policies, and other outstanding issues to be presented during the upcoming status conference with court	Case Organization, Planning and Strategy
7/17/2020	Travis Close	1.2	\$850	\$1,020	review/analysis of proposed custodians — Sheila Garner (VP, Senior Regional Operations), Tonya Glass, Roxanne Gooding, Leticia Higaes # BKD1125438-BKD1125581 (204-222 of 360)	Discovery (Non-Deposition)
7/17/2020	Travis Close	1.0	\$850	\$850	review/analysis of proposed custodians — Sheila Garner (VP, Senior Regional Operations), Tonya Glass, Roxanne Gooding, Leticia Higaes # BKD1125581-BKD1125622 (222-239 of 360)	Discovery (Non-Deposition)
7/17/2020	Travis Close	1.0	\$850	\$850	review/analysis of proposed custodians — Sheila Garner (VP, Senior Regional Operations), Tonya Glass, Roxanne Gooding, Leticia Higaes # BKD1125622-BKD1125735 (239-257 of 360)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/20/2020	Mark Johnson	0.5	\$1,150	\$575	call w/ RBGG attorneys, BU and GBW re status of interrogatory responses and rfp responses and schedule for completing same, issues to address in responses.	Discovery (Non-Deposition)
7/20/2020	Mark Johnson	0.2	\$1,150	\$230	coms w/ GBW re doc production since March;strategy for submission to court for 7/30 discovery CMC	Discovery (Non-Deposition)
7/20/2020	Rachel Steyer	0.2	\$750	\$150	email to TSJ with revised draft declaration + suggestions	Class Certification
7/20/2020	Rachel Steyer	0.8	\$750	\$600	drafting and editing class member declaration	Class Certification
7/20/2020	Rachel Steyer	1.7	\$750	\$1,275	partial intake w/Patty Phelps, created client folder	Class Outreach and Contact
7/20/2020	Rachel Steyer	0.9	\$750	\$675	conducted partial intake w/class member, rescheduled for later in the week so she could look through and review her files, creating client folder	Class Outreach and Contact
7/20/2020	Rachel Steyer	0.3	\$750	\$225	preparing class mailer to provide to class member via email as requested following phone call discussing litigation	Class Outreach and Contact
7/20/2020	Rachel Steyer	2.2	\$750	\$1,650	completed intake w/class member, updating sharepoint	Class Outreach and Contact
7/20/2020	Rachel Steyer	1.0	\$750	\$750	class outreach w/contact, answering questions, assessing claims for potential intake/declarations, scheduling intakes, listening to VMs, returnign calls, updating sharepoint	Class Outreach and Contact
7/20/2020	Travis Close	1.0	\$850	\$850	review/analysis of proposed custodians — Sheila Garner (VP, Senior Regional Operations), Tonya Glass, Roxanne Gooding, Leticia Higaes # BKD1125735-BKD1130113 (256-271 of 360)	Case Organization, Planning and Strategy
7/20/2020	Travis Close	0.5	\$850	\$425	review materials/memos from co-counsel regarding class representative standing issues before today's call	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/20/2020	Travis Close	1.2	\$850	\$1,020	review/analysis of proposed custodians — Sheila Garner (VP, Senior Regional Operations), Tonya Glass, Roxanne Gooding, Leticia Higaes # BKD1130860-BKD1130972 (292-306 of 360)	Discovery (Non-Deposition)
7/20/2020	Travis Close	0.4	\$850	\$340	team call with GBW, MTJ, and co-counsel discussing plaintiff's discovery responses	Discovery (Non-Deposition)
7/21/2020	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ; RB re D's production of documents since April 2020, non-produced documents; analysis of same and preparation of conference with MJ Beeler	Discovery (Non-Deposition)
7/21/2020	Mark Johnson	0.2	\$1,150	\$230	coms w/ RAB and GBW re status of document production, indices of files produced since March	Discovery (Non-Deposition)
7/21/2020	Rachel Steyer	1.7	\$750	\$1,275	partial intake w/class member, scheduled follow up call	Class Outreach and Contact
7/21/2020	Rachel Steyer	1.7	\$750	\$1,275	conducting intake w/class member, creating client folder, updating sharepoint	Class Outreach and Contact
7/21/2020	Rachel Steyer	1.8	\$750	\$1,350	intake call w/class member, updating sharepoint, creating client folder	Class Outreach and Contact
7/21/2020	Rachel Steyer	0.9	\$750	\$675	partial intake w/class member, updating sharepoint, creating client folder	Class Outreach and Contact
7/21/2020	Rachel Steyer	0.8	\$750	\$600	listening to VMs, conducting follow up/returning calls, outreach with class members answering questions, assessing claims	Class Outreach and Contact
7/21/2020	Travis Close	1.2	\$850	\$1,020	review/analysis of proposed custodians — Sheila Garner (VP, Senior Regional Operations), Tonya Glass, Roxanne Gooding, Leticia Higaes # BKD1130772-BKD1130879 (306-320 of 360)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/21/2020	Travis Close	1.0	\$850	\$850	review/analysis of proposed custodians — Sheila Garner (VP, Senior Regional Operations), Tonya Glass, Roxanne Gooding, Leticia Higaes # BKD1130879-BKD1132739 (320-339 of 360)	Discovery (Non-Deposition)
7/21/2020	Travis Close	1.1	\$850	\$935	review/analysis of proposed custodians — Sheila Garner (VP, Senior Regional Operations), Tonya Glass, Roxanne Gooding, Leticia Higaes # BKD1132739-BKD1152368 (339-360 of 360)	Discovery (Non-Deposition)
7/22/2020	Guy Wallace	0.6	\$1,350	\$810	review and analysis of draft Joint Status statement re discovery issues from Maatman	Discovery (Non-Deposition)
7/22/2020	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re draft joint statement re issues from Maatman, P's response thereto, case schedule	Discovery (Non-Deposition)
7/22/2020	Mark Johnson	0.2	\$1,150	\$230	review draft section of discovery managment conference statement from OC	Case Management Conferences
7/22/2020	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re Ds section of discovery CMC statement, timing and content of proposed response/P's section	Case Management Conferences
7/22/2020	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW re response to Ds section of joint discovery statement	Case Management Conferences
7/22/2020	Mark Johnson	0.4	\$1,150	\$460	begin working on P section of joint statement re status of discovery for discovery CMC	Case Management Conferences
7/22/2020	Mark Johnson	0.1	\$1,150	\$115	email exchange w/ RAB re timing of document production and status of redaction process	Discovery (Non-Deposition)
7/22/2020	Rachel Steyer	3.3	\$750	\$2,475	drafting and editing class member declaration	Class Certification
7/22/2020	Rachel Steyer	1.0	\$750	\$750	drafting and editing class member declaration	Class Certification
7/22/2020	Rachel Steyer	1.0	\$750	\$750	phone call w/TSJ discussing tips for declaration drafting, edits, intake process	Class Outreach and Contact
7/22/2020	Rachel Steyer	0.2	\$750	\$150	email to class member who requested class mailer w/more case info	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/22/2020	Rachel Steyer	0.5	\$750	\$375	listening to VMs, returning calls, updating sharepoint, scheduling intakes, answering questions about case	Class Outreach and Contact
7/22/2020	Travis Close	0.5	\$850	\$425	review/analyze draft declaration of Patty Phelps	Case Organization, Planning and Strategy
7/22/2020	Travis Close	1.1	\$850	\$935	review analysis of proposed custodians - Adaline Kiehn, Brookdale Tracy - # BKD1124785-BKD1124840 (16-34 of 123)	Discovery (Non-Deposition)
7/22/2020	Travis Close	1.0	\$850	\$850	review analysis of proposed custodians - Adaline Kiehn, Brookdale Tracy - # BKD1124840-BKD1124884 (34-49 of 123)	Discovery (Non-Deposition)
7/23/2020	Guy Wallace	0.6	\$1,350	\$810	review and analysis of D's draft Joint Status Report re discovery; com's with MTJ re same	Discovery (Non-Deposition)
7/23/2020	Mark Johnson	5.8	\$1,150	\$6,670	work on Ps' section of discovery managment conference statement, research procedural and meet and confer history for same.	Case Management Conferences
7/23/2020	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re issue for discovery CMC statement.	Case Management Conferences
7/23/2020	Rachel Steyer	2.5	\$750	\$1,875	drafting and editing class member declaration	Class Certification
7/23/2020	Rachel Steyer	1.1	\$750	\$825	drafting and editing class member declaration	Class Certification
7/23/2020	Rachel Steyer	1.0	\$750	\$750	completed intake w/class member, updating sharepoint	Class Outreach and Contact
7/23/2020	Rachel Steyer	1.2	\$750	\$900	partial intake call w/class member, setting up client folder, updating sharepoint	Class Outreach and Contact
7/23/2020	Travis Close	0.5	\$850	\$425	revisions/edits to draft declaration of Tina Howard	Case Organization, Planning and Strategy
7/23/2020	Travis Close	1.0	\$850	\$850	review analysis of proposed custodians - Adaline Kiehn, Brookdale Tracy - # BKD1124884-BKD1124928 (49-64 of 123)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/23/2020	Travis Close	1.1	\$850	\$935	review analysis of proposed custodians - Adaline Kiehn, Brookdale Tracy - # BKD1124928-BKD1124978 (64-80 of 123)	Discovery (Non-Deposition)
7/23/2020	Travis Close	1.0	\$850	\$850	review analysis of proposed custodians - Adaline Kiehn, Brookdale Tracy - # BKD1124978-BKD1124925 (80-94 of 123)	Discovery (Non-Deposition)
7/24/2020	Mark Johnson	2.8	\$1,150	\$3,220	work on joint case mgmt conference for discovery cmc	Case Management Conferences
7/24/2020	Mark Johnson	0.5	\$1,150	\$575	com w/ GBW re status of review of docs for new construction alteration dates (.1), com w/ LEC re same and email to her and EO, RB, TCC re mtg (.1), review and analysis of spreadsheet tracking review and results of analysis of building department docs.	Case Organization, Planning and Strategy
7/24/2020	Rachel Steyer	0.4	\$750	\$300	editing class member declaration for TSJ	Class Certification
7/24/2020	Rachel Steyer	2.8	\$750	\$2,100	drafting and editing class member declaration	Class Certification
7/24/2020	Rachel Steyer	3.3	\$750	\$2,475	editing and drafting class member declaration	Class Certification
7/24/2020	Rachel Steyer	0.5	\$750	\$375	revising class outreach script based on client docs received, updating personal services section	Class Outreach and Contact
7/24/2020	Rachel Steyer	0.3	\$750	\$225	email to KDL, TSJ, JLH w/revised outreach script	Class Outreach and Contact
7/24/2020	Rachel Steyer	0.2	\$750	\$150	call w/class member to reschedule intake	Class Outreach and Contact
7/24/2020	Travis Close	1.2	\$850	\$1,020	review analysis of proposed custodians - Adaline Kiehn, Brookdale Tracy - # BKD1124925-BKD1125028 (94-108 of 123)	Case Organization, Planning and Strategy
7/24/2020	Travis Close	1.0	\$850	\$850	review analysis of proposed custodians - Adaline Kiehn, Brookdale Tracy - # BKD1125028-BKD1125751 (108-123 of 123)	Discovery (Non-Deposition)
7/24/2020	Travis Close	1.0	\$850	\$850	review analysis of proposed custodians -Robert Lanning (Maintenance Supervisor), Brookdale Tracy - # BKD0283429-BKD0283628 (1-16 of 532)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/25/2020	Mark Johnson	4.5	\$1,150	\$5,175	continue drafting sections of discovery case management conference status report	Case Management Conferences
7/26/2020	Guy Wallace	2.1	\$1,350	\$2,835	review and analysis of D's Status Report re Discovery & P's draft of same; revise and edit same	Discovery (Non-Deposition)
7/26/2020	Mark Johnson	1.0	\$1,150	\$1,150	revise discovery CMC statement with edits from GBW; fact check and cite check for references to meet and confer correspondence and procedural history.	Case Management Conferences
7/27/2020	Guy Wallace	0.6	\$1,350	\$810	review and analysis of D's further revisions to Joint Status Statement re discovery issues	Discovery (Non-Deposition)
7/27/2020	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re D's portions of Joint Status Report re discovery issues and P's further response thereto	Discovery (Non-Deposition)
7/27/2020	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re discovery issues, assignments re potential motions to compel and approach to class certification and a potential PSJ re access problems in Brookdale's newly constructed or altered facilities	Discovery (Non-Deposition)
7/27/2020	Guy Wallace	0.6	\$1,350	\$810	tc with MTJ; TCC; RES; LEC re discovery and Motions to compel	Discovery (Non-Deposition)
7/27/2020	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re response to D's revisions to joint status report	Case Management Conferences
7/27/2020	Mark Johnson	1.0	\$1,150	\$1,150	review revisions from OC and draft additions/revisions to Ps' section to address same; draft email to OC re same	Case Management Conferences
7/27/2020	Mark Johnson	0.5	\$1,150	\$575	mtg w/ RAB, TCC, LEC, EO re status of project investigating and documenting evidence of new construction and alteration; follow up on same, status of residency agreement analysis	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/27/2020	Mark Johnson	0.9	\$1,150	\$1,035	call w/ GBW, TCC, Rachel Steye, LEC re tasks and assignments on case, status of declaration gathering, motions to compel, construction history, residency agreements.	Case Organization, Planning and Strategy
7/27/2020	Mark Johnson	0.6	\$1,150	\$690	call w/ GBW re status of assignment of projects, including motions to compel, construction history investigation, residency agreemenet analysis.	Case Organization, Planning and Strategy
7/27/2020	Mark Johnson	0.6	\$1,150	\$690	gtm meeting w/ LEC, RAB, Edgar O and TCC re status of construction history investigation and documentation of same, follow up and status of residency agreement analysis	Case Organization, Planning and Strategy
7/27/2020	Rachel Steyer	1.2	\$750	\$900	discussion related to Brookdale outreach/declaration drafting, prospectvie work, Sunrise, other projects	Case Organization, Planning and Strategy
7/27/2020	Rachel Steyer	0.8	\$750	\$600	reviewing documents from class member and updating draft declaration accordingly to reflect additional details	Class Certification
7/27/2020	Rachel Steyer	1.6	\$750	\$1,200	drafting class member declaration	Class Certification
7/27/2020	Rachel Steyer	1.7	\$750	\$1,275	conducted intake call w/class member, created client folder, updated sharepoint	Class Outreach and Contact
7/27/2020	Rachel Steyer	0.2	\$750	\$150	listening to VM, calling class member back, scheduling intake	Class Outreach and Contact
7/27/2020	Rachel Steyer	1.3	\$750	\$975	reviewing which declarants need to conduct relativity search to obtain residency agreements, email to Lourdes requesting search w/excel spreadsheet of names, preparing spreadsheet	Class Outreach and Contact
7/27/2020	Travis Close	1.1	\$850	\$935	Team meeting re: class cert strategy, declarations, schedule for later this year, motion to amend, etc	Case Organization, Planning and Strategy
7/27/2020	Travis Close	0.3	\$850	\$255	Review/analyze latest draft of proposed search terms for ESI	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/27/2020	Travis Close	1.4	\$850	\$1,190	Review/analyze latest version of joint status report -- for thurs conference with judge - and make edits	Case Organization, Planning and Strategy
7/27/2020	Travis Close	1.2	\$850	\$1,020	review analysis of proposed custodians -Robert Lanning (Maintenance Supervisor), Brookdale Tracy - # BKD0283628-BKD0283734	Discovery (Non-Deposition)
7/28/2020	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ; Barnett re outreach to class and development of putative class member declarations	Class Certification
7/28/2020	Guy Wallace	3.2	\$1,350	\$4,320	revise and edit draft Interrogatory Answers: Algarme	Discovery (Non-Deposition)
7/28/2020	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ; Bonner re preparation for hearing with MJ Beeler re status of discovery	Discovery (Non-Deposition)
7/28/2020	Mark Johnson	0.3	\$1,150	\$345	review and edit final version of CMC discover statement, coms w/ OC re same	Case Management Conferences
7/28/2020	Mark Johnson	0.2	\$1,150	\$230	preliminary review of search terms proposed by Ds; email to COC re same	Discovery (Non-Deposition)
7/28/2020	Mark Johnson	1.4	\$1,150	\$1,610	coms w/ GBW and RAB re D's document production - statistics snd content; review and analysis of production indices, table of title occurrences, etc.	Discovery (Non-Deposition)
7/28/2020	Mark Johnson	0.7	\$1,150	\$805	further com w/ GBW re issues related to potential motion for leave to amend complaint to add plaintiffs	Other Motions
7/28/2020	Rachel Steyer	1.7	\$750	\$1,275	finishing drafting declaration	Class Certification
7/28/2020	Rachel Steyer	1.3	\$750	\$975	drafting and editing class member declaration	Class Certification
7/28/2020	Rachel Steyer	2.0	\$750	\$1,500	intake call w/class member, udpating sharepoint, creating client folder	Class Outreach and Contact
7/28/2020	Rachel Steyer	0.5	\$750	\$375	reviewing emails from Thomas re Brookdale outreach, circulating email to outreach team related to revised goals	Class Outreach and Contact
7/28/2020	Rachel Steyer	0.4	\$750	\$300	call w/TB to discuss latest outreach efforts and assignments	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/28/2020	Rachel Steyer	1.7	\$750	\$1,275	call w/KAJ to discuss outreach efforts, reviewed intake script, declaration drafting process, overview of case	Class Outreach and Contact
7/28/2020	Travis Close	1.2	\$850	\$1,020	review/analysis of proposed custodians -Robert Lanning (Maintenance Supervisor), Brookdale Tracy - # BKD0283734-BKD0324165 (33-49 of 532)	Discovery (Non-Deposition)
7/28/2020	Travis Close	1.1	\$850	\$935	review/analysis of proposed custodians -Robert Lanning (Maintenance Supervisor), Brookdale Tracy - # BKD0324165-BKD0324184 (49-68 of 532)	Discovery (Non-Deposition)
7/28/2020	Travis Close	1.1	\$850	\$935	review/analysis of proposed custodians -Robert Lanning (Maintenance Supervisor), Brookdale Tracy - # BKD0324184-BKD0324200 (68-83 of 532)	Discovery (Non-Deposition)
7/29/2020	Guy Wallace	1.6	\$1,350	\$2,160	revise and edit draft answers to D.'s Interrogatories: Algarne	Discovery (Non-Deposition)
7/29/2020	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re D.'s productions of documents and content thereof, including productions since Seyfarth became counsel	Discovery (Non-Deposition)
7/29/2020	Guy Wallace	1.2	\$1,350	\$1,620	revise and edit draft answers to D.'s Interrogatories: Lindstrom	Discovery (Non-Deposition)
7/29/2020	Guy Wallace	1.3	\$1,350	\$1,755	preparation for discovery conference with MJ Beeler; review and analysis of Joint Status Report re discovery	Discovery (Non-Deposition)
7/29/2020	Mark Johnson	0.6	\$1,150	\$690	calls w/ GBW (.3) and GCG (.3) re strategy for discovery CMC and iscovery more generally.	Case Management Conferences
7/29/2020	Mark Johnson	3.8	\$1,150	\$4,370	review document production and prepare overview of each set of produced documents for use in discovery CMC	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/29/2020	Rachel Steyer	0.3	\$750	\$225	editing TSJ draft declaration, sending email to her w/comments	Class Certification
7/29/2020	Rachel Steyer	1.9	\$750	\$1,425	drafting and editing class member declaration, sending to TCC, MTJ, GBW for review, updating sharepoint	Class Certification
7/29/2020	Rachel Steyer	0.3	\$750	\$225	editing draft declaration from KDL	Class Certification
7/29/2020	Rachel Steyer	0.3	\$750	\$225	email to KDL with comments and revisions for draft declaration	Class Certification
7/29/2020	Rachel Steyer	1.9	\$750	\$1,425	conducting intake call w/class member, creating client folder, updating sharepoint	Class Outreach and Contact
7/29/2020	Travis Close	0.3	\$850	\$255	review/analyze Ds proposed search terms & compare to Ps proposed terms	Case Organization, Planning and Strategy
7/29/2020	Travis Close	1.1	\$850	\$935	review/analysis of proposed custodians -Robert Lanning (Maintenance Supervisor), Brookdale Tracy - # BKD0324200-BKD0324214 (83-98 of 532)	Discovery (Non-Deposition)
7/29/2020	Travis Close	1.0	\$850	\$850	review/analysis of proposed custodians -Robert Lanning (Maintenance Supervisor), Brookdale Tracy - # BKD0324214-BKD0324242 (98-120 of 532)	Discovery (Non-Deposition)
7/29/2020	Travis Close	1.1	\$850	\$935	review/analysis of proposed custodians -Robert Lanning (Maintenance Supervisor), Brookdale Tracy - # BKD0324242-BKD0324263 (120-141 of 532)	Discovery (Non-Deposition)
7/30/2020	Guy Wallace	4.1	\$1,350	\$5,535	prepare for and participate in discovery hearing with MJ Beeler; counsel for D.'s; GG; MTJ	Discovery (Non-Deposition)
7/30/2020	Guy Wallace	0.5	\$1,350	\$675	com's with GG; MTJ re results of discovery conference	Discovery (Non-Deposition)
7/30/2020	Guy Wallace	0.2	\$1,350	\$270	review and analysis of Order re discovery issued by MJ Beeler on 7/30/20	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/30/2020	Guy Wallace	0.4	\$1,350	\$540	revise and edit draft Interrogatory Answers re Quinlan; Boris	Discovery (Non-Deposition)
7/30/2020	Mark Johnson	1.8	\$1,150	\$2,070	prep for discover CMC including review of statements and letter briefs, coms w/ GBW and prepare outline of points to be made, set up for call	Case Management Conferences
7/30/2020	Mark Johnson	2.5	\$1,150	\$2,875	appearance for discovery case mgmt conference w/MJ Beeler	Case Management Conferences
7/30/2020	Rachel Steyer	0.4	\$750	\$300	editing TSJ class member declaration	Case Organization, Planning and Strategy
7/30/2020	Rachel Steyer	0.2	\$750	\$150	editing TSJ draft declaration	Class Certification
7/30/2020	Rachel Steyer	3.1	\$750	\$2,325	drafting class member declaration, updating sharepoint, sending via email to GBW, TCC, MTJ for review	Class Certification
7/30/2020	Rachel Steyer	2.4	\$750	\$1,800	redoing/editing draft of BCR declaration, reviewing intake	Class Certification
7/30/2020	Rachel Steyer	0.2	\$750	\$150	email to TSJ with BCR old intake for class member whos been reassigned to TSJ	Class Outreach and Contact
7/30/2020	Rachel Steyer	0.4	\$750	\$300	received call from class member, answered questions, listened to experiences, scheduled intake	Class Outreach and Contact
7/30/2020	Rachel Steyer	0.3	\$750	\$225	reviewing older BCR intakes to determine whether to redraft for declarations	Class Outreach and Contact
7/30/2020	Travis Close	0.5	\$850	\$425	Prepare for status conference meeting with Mag Judge Beeler	Case Organization, Planning and Strategy
7/30/2020	Travis Close	1.2	\$850	\$1,020	review/analysis of proposed custodians -Robert Lanning (Maintenance Supervisor), Brookdale Tracy - # BKD0324263-BKD0324279 (141-157 of 532)	Discovery (Non-Deposition)
7/30/2020	Travis Close	1.0	\$850	\$850	review/analysis of proposed custodians -Robert Lanning (Maintenance Supervisor), Brookdale Tracy - # BKD0324279-BKD0324302 (157-178 of 532)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/30/2020	Travis Close	1.0	\$850	\$850	review/analysis of proposed custodians -Robert Lanning (Maintenance Supervisor), Brookdale Tracy - # BKD0324302-BKD0324320 (178-198 of 532)	Discovery (Non-Deposition)
7/30/2020	Travis Close	2.3	\$850	\$1,955	discovery hearing w/ Mag judge beeler	Discovery (Non-Deposition)
7/31/2020	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re motions to compel; D's production obligations in August; ESI	Discovery (Non-Deposition)
7/31/2020	Guy Wallace	3.8	\$1,350	\$5,130	revise and edit draft interrogatory answers: Lindstrom	Discovery (Non-Deposition)
7/31/2020	Guy Wallace	1.8	\$1,350	\$2,430	revise and edit draft interrogatory answers re Stacia Stiner	Discovery (Non-Deposition)
7/31/2020	Rachel Steyer	0.8	\$750	\$600	editing older declaration drafts, fixing formatting, making sure in line with same language in template	Class Certification
7/31/2020	Rachel Steyer	0.4	\$750	\$300	updating/revising older declaration	Class Certification
7/31/2020	Rachel Steyer	0.8	\$750	\$600	spoke w/responsible party, decided not to conduct formal intake b/c family member only resided in independent living, answered questions, updated sharepoint	Class Outreach and Contact
7/31/2020	Rachel Steyer	0.4	\$750	\$300	called class member back, answered questions, scheduled intake	Class Outreach and Contact
7/31/2020	Rachel Steyer	0.2	\$750	\$150	email with RB re searching relativity for specific documents	Discovery (Non-Deposition)
7/31/2020	Rachel Steyer	0.2	\$750	\$150	reviewing document production from RB related to residency agreements for corresponding class members/declarants	Discovery (Non-Deposition)
7/31/2020	Rachel Steyer	0.2	\$750	\$150	email to GBW w/spreadsheet of missing residency agreements	Discovery (Non-Deposition)
7/31/2020	Rachel Steyer	0.4	\$750	\$300	email to RAB, LEC, JMP re document production	Discovery (Non-Deposition)
7/31/2020	Rachel Steyer	0.2	\$750	\$150	reviewing document production worksheet, searching for potential declarants' names	Discovery (Non-Deposition)
7/31/2020	Rachel Steyer	0.8	\$750	\$600	reviewing joint status report for discovery CMC	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/31/2020	Travis Close	0.2	\$850	\$170	Review/analyze judge beeler's order to the parties following yesterday's hearing	Case Organization, Planning and Strategy
7/31/2020	Travis Close	0.3	\$850	\$255	Email to RAB re: additional residency agreements not found in database	Discovery (Non-Deposition)
7/31/2020	Travis Close	1.2	\$850	\$1,020	review/analysis of proposed custodians -Robert Lanning (Maintenance Supervisor), Brookdale Tracy - # BKD0324320-BKD0324339 (198-217 of 532)	Discovery (Non-Deposition)
7/31/2020	Travis Close	1.0	\$850	\$850	review/analysis of proposed custodians -Robert Lanning (Maintenance Supervisor), Brookdale Tracy - # BKD0324339-BKD0324359 (217-237 of 532)	Discovery (Non-Deposition)
7/31/2020	Travis Close	1.0	\$850	\$850	review/analysis of proposed custodians -Robert Lanning (Maintenance Supervisor), Brookdale Tracy - # BKD0324359-BKD0324441 (237-281 of 532)	Discovery (Non-Deposition)
7/31/2020	Travis Close	0.7	\$850	\$595	Analyze residency agreement index (pre-database) for copies of declarants' files	Discovery (Non-Deposition)
8/2/2020	Guy Wallace	4.2	\$1,350	\$5,670	revise and edit draft interrogatory responses: Stiner, Lindstrom, Jestrabek-Hart	Discovery (Non-Deposition)
8/2/2020	Guy Wallace	2.4	\$1,350	\$3,240	revise and edit draft interrogatory answers; Quinlan	Discovery (Non-Deposition)
8/2/2020	Guy Wallace	1.6	\$1,350	\$2,160	revise and edit draft responses to D.'s interrogatories to Stiner; preparation of comments re same; com's with MTJ re same (.2)	Discovery (Non-Deposition)
8/3/2020	Guy Wallace	4.6	\$1,350	\$6,210	revise and edit draft Interrogatory responses re Stiner; Algarne; Lindstrom; Quinlan; com's with BBK; JY; AX; MTJ; SC re same (.4)	Discovery (Non-Deposition)
8/3/2020	Mark Johnson	1.5	\$1,150	\$1,725	work on third set of rogs, including reveiw of assessment data and job descriptions for proper terminology to use.	Discovery (Non-Deposition)
8/3/2020	Mark Johnson	0.3	\$1,150	\$345	coms (x3) w/ GBW re rog responses and objections	Discovery (Non-Deposition)
8/3/2020	Rachel Steyer	0.2	\$750	\$150	reviewing documents sent by client via fax, creating client folder	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/3/2020	Rachel Steyer	0.7	\$750	\$525	beginning to draft MTC	Other Motions
8/3/2020	Travis Close	1.0	\$850	\$850	review/analysis of proposed custodians -Robert Lanning (Maintenance Supervisor), Brookdale Tracy - # BKD0324441-BKD0324462 (281-303 of 532)	Discovery (Non-Deposition)
8/3/2020	Travis Close	1.0	\$850	\$850	review/analysis of proposed custodians -Robert Lanning (Maintenance Supervisor), Brookdale Tracy - # BKD0324462-BKD0324487 (303-324 of 532)	Discovery (Non-Deposition)
8/4/2020	Guy Wallace	3.7	\$1,350	\$4,995	review and analysis of and revise and edit draft Interrogatory responses re Jestrabek-Hart	Discovery (Non-Deposition)
8/4/2020	Guy Wallace	1.8	\$1,350	\$2,430	revise and edit draft responses to D.'s Interrogatories to Boris	Discovery (Non-Deposition)
8/4/2020	Guy Wallace	0.8	\$1,350	\$1,080	tc with GG; BBK; JY; AX; MTJ re preparation of P.'s responses to D.'s Interrogatories and RFPs	Discovery (Non-Deposition)
8/4/2020	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re P's responses to D.'s discovery; P's of further MTC's re Brookdale audits and ESI discovery	Discovery (Non-Deposition)
8/4/2020	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ; RLS re preparation of MTC re construction history of D.'s facilities	Other Motions
8/4/2020	Mark Johnson	1.0	\$1,150	\$1,150	call w/ GBW, JY, GG, AX, BBK to review and discuss draft rog responses.	Discovery (Non-Deposition)
8/4/2020	Mark Johnson	1.2	\$1,150	\$1,380	review and revise draft Stiner responses to rogs	Discovery (Non-Deposition)
8/4/2020	Mark Johnson	0.8	\$1,150	\$920	review and revise draft Stiner responses to RFPs	Discovery (Non-Deposition)
8/4/2020	Mark Johnson	0.8	\$1,150	\$920	calls w/ GBW (x3) re Ps responses to Ds rogs, set one	Discovery (Non-Deposition)
8/4/2020	Mark Johnson	2.0	\$1,150	\$2,300	prepare draft joint letter re audit-related RFPs, including review of meet and confer correspondence and prior filingsl	Other Motions
8/4/2020	Rachel Steyer	0.3	\$750	\$225	editing TSJ draft declaration, sending to her for review	Class Certification
8/4/2020	Rachel Steyer	0.2	\$750	\$150	email to TSJ re how to discuss billing/fees in draft declaration, reviewing class member billing statements	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/4/2020	Rachel Steyer	0.4	\$750	\$300	editing second version of TSJ draft declaration	Class Certification
8/4/2020	Rachel Steyer	0.2	\$750	\$150	email to TSJ with comments re second declaration draft	Class Certification
8/4/2020	Rachel Steyer	0.5	\$750	\$375	editing KAJ draft declaration	Class Certification
8/4/2020	Rachel Steyer	2.1	\$750	\$1,575	intake call w/class member, creating client file, updating sharepoint	Class Outreach and Contact
8/4/2020	Rachel Steyer	0.2	\$750	\$150	brief phone call w/class member, rescheduling second half of intake	Class Outreach and Contact
8/4/2020	Rachel Steyer	0.6	\$750	\$450	reviewing other MTCs, adding language	Pleadings and Motions Re: Pleadings
8/4/2020	Rachel Steyer	1.3	\$750	\$975	legal research re MTC supplement to ROGS	Pleadings and Motions Re: Pleadings
8/4/2020	Travis Close	0.4	\$850	\$340	emails to GBW re: analysis of Fountaingrove facility inspection	Case Organization, Planning and Strategy
8/4/2020	Travis Close	0.3	\$850	\$255	Email to RAB re: scotts valley production	Case Organization, Planning and Strategy
8/5/2020	Guy Wallace	0.4	\$1,350	\$540	com's with JY; BBK; MTJ re interrogatory responses re named P's	Discovery (Non-Deposition)
8/5/2020	Guy Wallace	1.5	\$1,350	\$2,025	preparation of draft of interrogatory response re access barriers at Brookdale facilities including facilities at which named P.'s reside or resided; com's with Waters re same (.4); revise and edit same	Discovery (Non-Deposition)
8/5/2020	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ; Marks re PSS data; Kronos data; D.'s production of audits and MTC re same	Other Motions
8/5/2020	Mark Johnson	0.8	\$1,150	\$920	draft email to D Marks and other co-counsel explaining status of Kronos data production, proposed follow-up, issues with job descriptions and spreadsheet of job code / descriptions; review materials for same	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/5/2020	Mark Johnson	0.5	\$1,150	\$575	draft email to OC with inquire pertaining to search terms and custodians	Discovery (Non-Deposition)
8/5/2020	Mark Johnson	0.1	\$1,150	\$115	Call w/ R Steyer re motion to compel further responses to rogs 9-11	Other Motions
8/5/2020	Mark Johnson	0.7	\$1,150	\$805	finalize draft of joint discovery letter re audit related documents and com w/ GBW re same	Other Motions
8/5/2020	Rachel Steyer	0.8	\$750	\$600	call with KAJ to review draft declaration/drafting tips	Class Certification
8/5/2020	Rachel Steyer	0.5	\$750	\$375	partial intake w/class member, rescheduled so she could take a few days to review her files to refresh memory	Class Outreach and Contact
8/5/2020	Rachel Steyer	0.5	\$750	\$375	call with TB to discuss outreach efforts and tracking	Class Outreach and Contact
8/5/2020	Rachel Steyer	0.8	\$750	\$600	MTC supplemental response research	Pleadings and Motions Re: Pleadings
8/5/2020	Travis Close	0.8	\$850	\$680	Edits to declaration of Walsh LeAnne Re by TSJ	Class Outreach and Contact
8/5/2020	Travis Close	0.4	\$850	\$340	analysis of named plaintiff facility inspections for GBW	Discovery (Non-Deposition)
8/5/2020	Travis Close	1.1	\$850	\$935	review/analysis of proposed custodians -Robert Lanning (Maintenance Supervisor), Brookdale Tracy - # BKD0324487-BKD0324513 (324-342 of 532)	Discovery (Non-Deposition)
8/5/2020	Travis Close	1.0	\$850	\$850	review/analysis of proposed custodians -Robert Lanning (Maintenance Supervisor), Brookdale Tracy - # BKD0324513-BKD0324549 (342-358 of 532)	Discovery (Non-Deposition)
8/6/2020	Guy Wallace	0.6	\$1,350	\$810	com's with BBK; AX; BU re preparation of responses to D.'s Interrogatories to the named P.'s	Discovery (Non-Deposition)
8/6/2020	Rachel Steyer	0.8	\$750	\$600	editing KDL draft declaration	Class Certification
8/6/2020	Rachel Steyer	0.5	\$750	\$375	continued conference call w/Brookdale outreach team	Class Outreach and Contact
8/6/2020	Rachel Steyer	0.2	\$750	\$150	circulating TAC to outreach team (issues w/outlook)	Class Outreach and Contact
8/6/2020	Rachel Steyer	2.8	\$750	\$2,100	drafting mtc for interrogatories	Pleadings and Motions Re: Pleadings
8/6/2020	Rachel Steyer	1.2	\$750	\$900	research for MTC	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/6/2020	Travis Close	0.2	\$850	\$170	Email to GBW re: team meeting next week	Case Organization, Planning and Strategy
8/6/2020	Travis Close	1.0	\$850	\$850	review/analysis of proposed custodians -Robert Lanning (Maintenance Supervisor), Brookdale Tracy - # BKD0324549-BKD0324602 (358-384 of 532)	Discovery (Non-Deposition)
8/6/2020	Travis Close	1.1	\$850	\$935	review/analysis of proposed custodians -Robert Lanning (Maintenance Supervisor), Brookdale Tracy - # BKD0324602-BKD0324640 (384-412 of 532)	Discovery (Non-Deposition)
8/6/2020	Travis Close	1.0	\$850	\$850	review/analysis of proposed custodians -Robert Lanning (Maintenance Supervisor), Brookdale Tracy - # BKD0324640-BKD0324714 (412-455 of 532)	Discovery (Non-Deposition)
8/7/2020	Guy Wallace	4.2	\$1,350	\$5,670	review and analysis of and revise and edit draft Interrogatory Responses re Schmidt	Discovery (Non-Deposition)
8/7/2020	Rachel Steyer	0.3	\$750	\$225	editing KDL draft declaration	Class Certification
8/7/2020	Rachel Steyer	0.2	\$750	\$150	email to KDL with draft declaration edits	Class Certification
8/7/2020	Rachel Steyer	0.4	\$750	\$300	updating sharepoint to track discovery/documents received from class members	Discovery (Non-Deposition)
8/7/2020	Travis Close	1.1	\$850	\$935	review/analysis of proposed custodians -Robert Lanning (Maintenance Supervisor), Brookdale Tracy - # BKD0324714-BKD0324795 (455-481 of 532)	Discovery (Non-Deposition)
8/7/2020	Travis Close	1.1	\$850	\$935	review/analysis of proposed custodians -Robert Lanning (Maintenance Supervisor), Brookdale Tracy - # BKD0324795-BKD0324843 (481-502 of 532)	Discovery (Non-Deposition)
8/7/2020	Travis Close	1.0	\$850	\$850	review/analysis of proposed custodians -Robert Lanning (Maintenance Supervisor), Brookdale Tracy - # BKD0324843-BKD0325351 (502-532 of 532)	Discovery (Non-Deposition)
8/8/2020	Guy Wallace	1.7	\$1,350	\$2,295	revise and edit draft Interrogatory Responses re Schmidt; review and analysis of Third Amended Complaint and D. Ct.'s decision on D.'s motion to dismiss in connection with same	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/8/2020	Rachel Steyer	1.3	\$750	\$975	motion to compel interrogatory response	Pleadings and Motions Re: Pleadings
8/9/2020	Guy Wallace	1.1	\$1,350	\$1,485	revise and edit further draft of Interrogatory Responses re Algarne; com's with MTJ; JY re same (.3)	Discovery (Non-Deposition)
8/10/2020	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of and revise and edit final draft of Algarne Interrogatory Responses	Discovery (Non-Deposition)
8/10/2020	Guy Wallace	0.3	\$1,350	\$405	revise and edit draft of letter brief re MTC re audits; com's with MTJ re same	Other Motions
8/10/2020	Mark Johnson	1.5	\$1,150	\$1,725	draft meet and confer ltr to OC Maatman re production of Kronos data for all facilities, missing job codes and clarification re job descriptions; review prior correspondence and filings for same	Discovery (Non-Deposition)
8/10/2020	Mark Johnson	0.6	\$1,150	\$690	revise and finalize proposed joint discovery ltr re MTC audit data; draft cover email for same	Discovery (Non-Deposition)
8/10/2020	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW and emails w/ COC re rog responses, responses to document requests	Discovery (Non-Deposition)
8/10/2020	Rachel Steyer	0.3	\$750	\$225	editing KAJ draft declaration	Class Certification
8/10/2020	Rachel Steyer	0.4	\$750	\$300	call with KAJ to review edits to declaration draft	Class Certification
8/10/2020	Rachel Steyer	0.2	\$750	\$150	editing KAJ draft declaration	Class Certification
8/10/2020	Rachel Steyer	0.2	\$750	\$150	received follow up call from class member, rescheduled intake	Class Outreach and Contact
8/10/2020	Rachel Steyer	0.2	\$750	\$150	question to GBW, MTJ, and TCC following conversation with class member re estates and settlement	Class Outreach and Contact
8/10/2020	Rachel Steyer	2.4	\$750	\$1,800	listening to voicemails, returning calls, setting up intakes/follow up calls, assessing class members for intakes	Class Outreach and Contact
8/10/2020	Rachel Steyer	0.6	\$750	\$450	attempted class outreach--leaving VMs, updating sharepoint	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/10/2020	Rachel Steyer	0.3	\$750	\$225	updating Excel spreadsheet to track documents received/needed from class members	Discovery (Non-Deposition)
8/10/2020	Travis Close	0.2	\$850	\$170	review correspondence from DTM re: Kronos data/job codes spreadsheet	Case Organization, Planning and Strategy
8/10/2020	Travis Close	0.4	\$850	\$340	Review/analyze MTJ's draft motion to compel further responses re: audits	Case Organization, Planning and Strategy
8/10/2020	Travis Close	1.0	\$850	\$850	review and analysis of custodians proposed — Cafarelli, Pauline (Director of Financial Planning & Analysis, West) - # BKD0024048-BKD0094479 (1-26 of 26)	Discovery (Non-Deposition)
8/10/2020	Travis Close	1.0	\$850	\$850	review and analysis of custodians proposed —Estes, Kim (Senior VP of Clinical Services) - # BKD0018518-BKD0025451 (1-24 of 48)	Discovery (Non-Deposition)
8/10/2020	Travis Close	1.2	\$850	\$1,020	review and analysis of custodians proposed —Estes, Kim (Senior VP of Clinical Services) - #BKD0025451-BKD0326113 (24-48 of 48)	Discovery (Non-Deposition)
8/11/2020	Guy Wallace	3.1	\$1,350	\$4,185	prepare for and participate in meeting w/ MTJ; TCC; RLS re motion for class certification re ADA accessibility, transportation and emergency evacuation claims	Class Certification
8/11/2020	Guy Wallace	0.7	\$1,350	\$945	review and analysis of further draft of Interrogatory responses re Schmidt	Discovery (Non-Deposition)
8/11/2020	Guy Wallace	1.3	\$1,350	\$1,755	revise and edit further drafts of interrogatory responses re Jestrabek-Hart; Boris; Quinlan; com's with JY; AX re same	Discovery (Non-Deposition)
8/11/2020	Mark Johnson	2.5	\$1,150	\$2,875	mtg w/ GBW, TCC, RS, LEC re planning for class cert motion on access issues, related discovery and timetable for same, construction history	Case Organization, Planning and Strategy
8/11/2020	Mark Johnson	0.3	\$1,150	\$345	final revisions to ltr to OC re Kronos data and job descriptions	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/11/2020	Rachel Steyer	3.5	\$750	\$2,625	meeting with LEC, GBW, TCC, MTJ to discuss strategy	Case Organization, Planning and Strategy
8/11/2020	Rachel Steyer	0.6	\$750	\$450	conducted partial intake with class member, created client folder, scheduled f/u call	Class Outreach and Contact
8/11/2020	Rachel Steyer	1.1	\$750	\$825	conducted partial intake, created client folder, scheduled f/u call	Class Outreach and Contact
8/11/2020	Rachel Steyer	0.4	\$750	\$300	leaving VMs, updating sharepoint, attempted class outreach	Class Outreach and Contact
8/11/2020	Rachel Steyer	0.7	\$750	\$525	contacted class members, answering questions, scheduling intakes	Class Outreach and Contact
8/11/2020	Travis Close	0.5	\$850	\$425	Review EPO's analysis of new construction and alteration from city records produced to-date	Case Organization, Planning and Strategy
8/11/2020	Travis Close	2.8	\$850	\$2,380	Team meeting re: motions to compel, inspections, pretrial scheduling/class cert, depositions, etc	Case Organization, Planning and Strategy
8/11/2020	Travis Close	1.0	\$850	\$850	Review/analysis of proposed custodians --- Allie Smith Goodwin (Div. Director of Sales) -- BKD0015032-BKD0098333 (1-28 of 51)	Discovery (Non-Deposition)
8/11/2020	Travis Close	1.0	\$850	\$850	Review/analysis of proposed custodians --- Allie Smith Goodwin (Div. Director of Sales) -- BKD0098333-BKD0752586 (28-51 of 51)	Discovery (Non-Deposition)
8/12/2020	Guy Wallace	1.8	\$1,350	\$2,430	review and analysis of further drafts of P.'s Interrogatory Responses, including Jestrabek-Hart; Carlson; Quinlan	Discovery (Non-Deposition)
8/12/2020	Guy Wallace	0.9	\$1,350	\$1,215	legal research and analysis re liability of subsequent owners for operating non-compliant newly constructed or altered facilities	Misc. Research
8/12/2020	Mark Johnson	3.7	\$1,150	\$4,255	work on Stiner responses to rogs	Discovery (Non-Deposition)
8/12/2020	Rachel Steyer	0.4	\$750	\$300	revising draft declaration template, sending email to GBW, TCC, MTJ	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/12/2020	Rachel Steyer	0.7	\$750	\$525	conducted partial intake, created client folder, rescheduled time for F/U call	Class Outreach and Contact
8/12/2020	Rachel Steyer	1.9	\$750	\$1,425	partial intake with class member, created client folder, scheduled f/u call	Class Outreach and Contact
8/12/2020	Rachel Steyer	3.0	\$750	\$2,250	intake call w/class member, updating sharepoint	Class Outreach and Contact
8/12/2020	Travis Close	1.1	\$850	\$935	Analyze & consolidate notes from yesterday's meeting	Case Organization, Planning and Strategy
8/12/2020	Travis Close	1.0	\$850	\$850	review/analysis — Service Alignment production — # BKD0159862-BKD1152664 (1-15 of 15)	Discovery (Non-Deposition)
8/13/2020	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of draft of P.'s RFP responses and MTJ redline re same; revise and edit same and com's to BBK; JY; AX; MTJ re same	Discovery (Non-Deposition)
8/13/2020	Mark Johnson	1.1	\$1,150	\$1,265	draft meet and confer letter re further responses to rogs and document production re construction, alteration, ada improvements.	Discovery (Non-Deposition)
8/13/2020	Mark Johnson	3.0	\$1,150	\$3,450	work on Stiner responses to interrogatories.	Discovery (Non-Deposition)
8/13/2020	Rachel Steyer	0.6	\$750	\$450	listened to VM, called class member back, answered questions re litigation, scheduled intake call	Class Outreach and Contact
8/13/2020	Rachel Steyer	0.2	\$750	\$150	email to TBB re updating sharepoint info/data tracking	Class Outreach and Contact
8/13/2020	Rachel Steyer	1.3	\$750	\$975	continued intake with class member	Class Outreach and Contact
8/13/2020	Rachel Steyer	0.2	\$750	\$150	email to TBB re sharepoint tracking	Class Outreach and Contact
8/13/2020	Rachel Steyer	0.2	\$750	\$150	reading defendant's response to second set of ROGs	Discovery (Non-Deposition)
8/13/2020	Travis Close	1.0	\$850	\$850	review/analysis of proposed custodians -- Chris Maingot (Senior VP, Owner Relations) # BKD0025046-BKD0284041 (17-36 of 36)	Case Organization, Planning and Strategy
8/13/2020	Travis Close	1.0	\$850	\$850	review/analysis of proposed custodians -- Chris Maingot (Senior VP, Owner Relations) # BKD0023841-BKD0025046 (1-17 of 36)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/14/2020	Guy Wallace	2.2	\$1,350	\$2,970	review and analysis of further draft of Interrogatory Response re Stacia Stiner; revise and edit same; com's with MTJ re same (.3)	Discovery (Non-Deposition)
8/14/2020	Guy Wallace	0.9	\$1,350	\$1,215	com's with BBk; JY; AX; BU; MTJ re preparation of and revisions to final drafts of Responses to Defendants' Interrogatories and RFP's to the named Plaintiffs	Discovery (Non-Deposition)
8/14/2020	Mark Johnson	9.5	\$1,150	\$10,925	work on preparing and finalizing Stiner responses to document requests and interrogatories, including drafting, review of notes and documents containing responsive information, multiple follow up calls and electronic communications w/ R Stiner and S Stiner and with COC re facts, logistics of review and verification, formatting and service.	Discovery (Non-Deposition)
8/14/2020	Rachel Steyer	0.2	\$750	\$150	adding section to class member declaration	Class Certification
8/14/2020	Rachel Steyer	0.4	\$750	\$300	editing KDL draft declaration	Class Certification
8/14/2020	Rachel Steyer	3.4	\$750	\$2,550	intake with class member, created client folder, updated sharepoint	Class Outreach and Contact
8/14/2020	Rachel Steyer	2.0	\$750	\$1,500	completed intake w/class member, updating sharepoint	Class Outreach and Contact
8/14/2020	Rachel Steyer	0.6	\$750	\$450	updating new fields in sharepoint to connote/track ADA class member declarations	Class Outreach and Contact
8/14/2020	Rachel Steyer	0.4	\$750	\$300	reviewing emails and documents sent by class member concerning mother's experience at Brookdale	Discovery (Non-Deposition)
8/14/2020	Travis Close	0.5	\$850	\$425	Call with EPO re: further analysis of building records, adding new columns of info in spreadsheet	Case Organization, Planning and Strategy
8/14/2020	Travis Close	0.4	\$850	\$340	Review/analyze EPO's list of descriptions of constructions/alterations	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/14/2020	Travis Close	1.0	\$850	\$850	Review/analysis of proposed custodians -- (Paul Nigro, SVP, Integration Office & Chief Information Officer) -- # BKD0023841-BKD0239620 (1-29 of 29)	Case Organization, Planning and Strategy
8/14/2020	Travis Close	1.1	\$850	\$935	Review/analysis of proposed custodians -- (Wendy McKenna, VP of Clinical Services, Mountain West) -- BKD0002564-BKD0026061) (1-21 of 40)	Discovery (Non-Deposition)
8/14/2020	Travis Close	1.0	\$850	\$850	Review/analysis of proposed custodians -- (Wendy McKenna, VP of Clinical Services, Mountain West) -- BKD0026061-BKD0284079 (21-40 of 40)	Discovery (Non-Deposition)
8/15/2020	Mark Johnson	2.0	\$1,150	\$2,300	travel to / from R Stiner residence and Brookdale San Ramon for mtg w/ R Stiner (.5) and delivery of rog responses and blank verification to client.	Discovery (Non-Deposition)
8/16/2020	Mark Johnson	2.5	\$1,150	\$2,875	review and make final edits to document requests, talk to cleint re corrections to draft interrogatory responses (.5); work with formatting / converging jpg of verificaion and pdf docs, draft cover mail to OC (.1)	Discovery (Non-Deposition)
8/17/2020	Rachel Steyer	0.4	\$750	\$300	editing TSJ draft declaration	Class Certification
8/17/2020	Rachel Steyer	0.3	\$750	\$225	email to TSJ with draft declaration and comments	Class Certification
8/17/2020	Rachel Steyer	1.5	\$750	\$1,125	drafting class member declaration	Class Certification
8/17/2020	Rachel Steyer	0.4	\$750	\$300	email to CBM re communications with class member	Class Outreach and Contact
8/17/2020	Rachel Steyer	2.2	\$750	\$1,650	intake with class member, updating sharepoint and client folder	Class Outreach and Contact
8/17/2020	Rachel Steyer	2.2	\$750	\$1,650	updating sharepoint to better track data for specific class member declarations (ADA vs. misrepresentation classes); updating declarations	Class Outreach and Contact
8/18/2020	Rachel Steyer	0.2	\$750	\$150	email to TSJ discussing revisions to draft declaration	Class Certification
8/18/2020	Rachel Steyer	0.2	\$750	\$150	question re definition of ADA class to GBW, TCC, MTJ	Class Certification
8/18/2020	Rachel Steyer	1.8	\$750	\$1,350	drafting class member declaration	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/18/2020	Rachel Steyer	2.7	\$750	\$2,025	intake call with class member, updating sharepoint	Class Outreach and Contact
8/18/2020	Rachel Steyer	0.2	\$750	\$150	emails to CBM re questions about outreach	Class Outreach and Contact
8/18/2020	Rachel Steyer	0.2	\$750	\$150	email to CBM re ADA class	Class Outreach and Contact
8/18/2020	Rachel Steyer	0.3	\$750	\$225	scheduled intake call w/class member	Class Outreach and Contact
8/18/2020	Rachel Steyer	0.2	\$750	\$150	listening to VM, scheduling intake	Class Outreach and Contact
8/18/2020	Rachel Steyer	0.2	\$750	\$150	email to CBM re class member	Class Outreach and Contact
8/19/2020	Rachel Steyer	1.7	\$750	\$1,275	finishing drafting class member declaration	Class Certification
8/19/2020	Rachel Steyer	0.2	\$750	\$150	email to Brookdale outreach team answering CBM questions	Class Outreach and Contact
8/19/2020	Rachel Steyer	0.4	\$750	\$300	call with BCR to get update from her re Brookdale	Class Outreach and Contact
8/19/2020	Rachel Steyer	1.6	\$750	\$1,200	completing intake with class member	Class Outreach and Contact
8/19/2020	Rachel Steyer	0.2	\$750	\$150	reviewing draft meet and confer letter	Pleadings and Motions Re: Pleadings
8/20/2020	Rachel Steyer	3.9	\$750	\$2,925	drafting class member declaration	Class Certification
8/20/2020	Rachel Steyer	0.2	\$750	\$150	email to TRB re outreach meeting	Class Outreach and Contact
8/20/2020	Rachel Steyer	0.2	\$750	\$150	email to KAJ re corresponding with class member	Class Outreach and Contact
8/20/2020	Rachel Steyer	0.2	\$750	\$150	reviewing sharepoint data to calculate # of facilities, email to GBW	Class Outreach and Contact
8/20/2020	Rachel Steyer	0.2	\$750	\$150	reviewing spreadsheet from JMP, responding to email w/question re doc production	Discovery (Non-Deposition)
8/20/2020	Rachel Steyer	2.5	\$750	\$1,875	drafting and editing MTC re ROGS/RFP, research	Pleadings and Motions Re: Pleadings
8/21/2020	Rachel Steyer	0.6	\$750	\$450	editing draft declaration from TSJ	Class Certification
8/21/2020	Rachel Steyer	1.6	\$750	\$1,200	conducted partial intake with class member, created client folder, updated sharepoint	Class Outreach and Contact
8/21/2020	Rachel Steyer	1.9	\$750	\$1,425	conducted partial intake with class member, created client folder	Class Outreach and Contact
8/21/2020	Rachel Steyer	0.9	\$750	\$675	reviewing residency agreements and other client files gathered from relativity	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/24/2020	Mark Johnson	0.4	\$1,150	\$460	call w/ BU, CH, MY re strategy concerning absent class member relectant to sit for depo, withdrawal of decl, communication w/ class member and OC	Discovery (Non-Deposition)
8/24/2020	Mark Johnson	0.7	\$1,150	\$805	Video conference w/ TCC, RAB, AX, JY, BBK re protocols and maechanics for production of plaintiffs' documents.	Discovery (Non-Deposition)
8/24/2020	Mark Johnson	3.4	\$1,150	\$3,910	review Stiner docs for relevance, privilege, redactions for preparation of production set.	Discovery (Non-Deposition)
8/24/2020	Rachel Steyer	0.2	\$750	\$150	email to CBM re outreach with deceased class members	Class Outreach and Contact
8/24/2020	Rachel Steyer	0.5	\$750	\$375	reviewing sharepoint outreach notes, organizing docs produced from declarants	Class Outreach and Contact
8/24/2020	Rachel Steyer	1.2	\$750	\$900	making contact with class members; assessing whether class members would be good candidates for intakes/declarations, reviewing claims of the case	Class Outreach and Contact
8/24/2020	Rachel Steyer	0.5	\$750	\$375	phone call w/BCR to review updates and status of Brookdale outreach	Class Outreach and Contact
8/24/2020	Rachel Steyer	0.2	\$750	\$150	prepared and emailed class mailer to proposed class member following phone call requesting additional written info	Class Outreach and Contact
8/24/2020	Rachel Steyer	4.1	\$750	\$3,075	additional research adn drafting of MTC	Pleadings and Motions Re: Pleadings
8/24/2020	Travis Close	0.3	\$850	\$255	review/analyze procedure for redacting Ps docs before production to Ds by RAB	Case Organization, Planning and Strategy
8/24/2020	Travis Close	0.2	\$850	\$170	review/analyze email from RLS re: question about scope of declarations for ADA class	Case Organization, Planning and Strategy
8/24/2020	Travis Close	0.2	\$850	\$170	email to EPO re: further discussion on building records assignment	Case Organization, Planning and Strategy
8/24/2020	Travis Close	0.7	\$850	\$595	team meeting re: document production of plaintiffs' records to defendants	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/25/2020	Mark Johnson	2.8	\$1,150	\$3,220	continue privilege and redaction review of Stiner documents for production; take notes re same	Discovery (Non-Deposition)
8/25/2020	Rachel Steyer	0.9	\$750	\$675	editing KAJ draft declarations	Case Organization, Planning and Strategy
8/25/2020	Rachel Steyer	0.2	\$750	\$150	email to KAJ with draft declarations and comments	Class Certification
8/25/2020	Rachel Steyer	0.2	\$750	\$150	received call back from class member	Class Outreach and Contact
8/25/2020	Rachel Steyer	0.4	\$750	\$300	received phone call from class member, updated sharepoint	Class Outreach and Contact
8/25/2020	Rachel Steyer	0.3	\$750	\$225	updating class outreach data/document tracking in sharepoint	Class Outreach and Contact
8/25/2020	Rachel Steyer	1.7	\$750	\$1,275	intake call w/class member, updating sharepoint, creating client folder	Class Outreach and Contact
8/25/2020	Rachel Steyer	0.8	\$750	\$600	attempted outreach to class members, leaving VMs	Class Outreach and Contact
8/25/2020	Rachel Steyer	0.8	\$750	\$600	scheduling intakes with class members, updating sharepoint, answering questions about lawsuit, evaluating for possible strength of intake/declaration	Class Outreach and Contact
8/25/2020	Rachel Steyer	0.9	\$750	\$675	reviewing old BCR intakes	Class Outreach and Contact
8/25/2020	Travis Close	0.9	\$850	\$765	research procedures for closeout inspections by architects in prep for call with EPO	Case Organization, Planning and Strategy
8/25/2020	Travis Close	0.4	\$850	\$340	Call with EPO re: spreadsheet building records analysis	Case Organization, Planning and Strategy
8/25/2020	Travis Close	0.5	\$850	\$425	research applicability of Health & Safety Code 19851 to subpoena to santa rosa inspection	Case Organization, Planning and Strategy
8/25/2020	Travis Close	1.3	\$850	\$1,105	Research case authority on power of subpoenas as court orders	Case Organization, Planning and Strategy
8/25/2020	Travis Close	0.2	\$850	\$170	Email to MTJ re: responding to santa rosa on subpoena objections	Case Organization, Planning and Strategy
8/25/2020	Travis Close	0.6	\$850	\$510	Draft response to santa rosa city attorney re: objections to subpoenas issued for building records	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/26/2020	Mark Johnson	0.3	\$1,150	\$345	email exchanges w/ staff re specific document searches and analysis related to residency agreements and construction work	Case Organization, Planning and Strategy
8/26/2020	Mark Johnson	0.5	\$1,150	\$575	call w/ TCC and SCC re search term development and strategy	Discovery (Non-Deposition)
8/26/2020	Mark Johnson	1.0	\$1,150	\$1,150	review of D search terms and our proposed search terms and perform relativity searches for call w/ SCC, TCC re search terms	Discovery (Non-Deposition)
8/26/2020	Mark Johnson	0.6	\$1,150	\$690	meet and confer w Santa Rosa City attorney re response to subpoena re construction documents and plans.	Discovery (Non-Deposition)
8/26/2020	Mark Johnson	1.8	\$1,150	\$2,070	review Stiner documents for production for privilege and redactions	Discovery (Non-Deposition)
8/26/2020	Mark Johnson	0.2	\$1,150	\$230	draft email to COC re status of development of search terms and request for input with instructions	Discovery (Non-Deposition)
8/26/2020	Rachel Steyer	0.4	\$750	\$300	editing and revising draft declaration from TSJ	Class Certification
8/26/2020	Rachel Steyer	2.0	\$750	\$1,500	drafting class member declaration	Class Certification
8/26/2020	Rachel Steyer	1.2	\$750	\$900	creating client folder, conducting intake, updating sharepoint	Class Outreach and Contact
8/26/2020	Rachel Steyer	1.2	\$750	\$900	continued and completed intake responsible party, updating sharepoint	Class Outreach and Contact
8/26/2020	Travis Close	0.5	\$850	\$425	review/analyze progress on IDing residency agreements from database produced	Case Organization, Planning and Strategy
8/26/2020	Travis Close	1.2	\$850	\$1,020	Analyze discovery responses for applicable search terms	Case Organization, Planning and Strategy
8/26/2020	Travis Close	0.5	\$850	\$425	prep for meeting with Santa Rosa City Attorney re: building records subpoenas	Case Organization, Planning and Strategy
8/26/2020	Travis Close	0.5	\$850	\$425	Meeting w/ MTJ, Santa Rosa City attorney re: building records subpoenas	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/26/2020	Travis Close	0.6	\$850	\$510	review Ps and Ds proposed search terms in prep for team call to discuss same	Discovery (Non-Deposition)
8/26/2020	Travis Close	0.5	\$850	\$425	Meeting w/ MTJ, SSC re: Ds proposed search terms and Ps replies	Discovery (Non-Deposition)
8/27/2020	Mark Johnson	0.5	\$1,150	\$575	prep for meet and confer w/ OC re costruction documents and rog responses, including review of correspondence and discovery responses, review of Relativity hit list and sample of documents concerning construction / alterations.	Discovery (Non-Deposition)
8/27/2020	Mark Johnson	0.4	\$1,150	\$460	meet and confer /w OC Maatman, Riley, Vick, Jacobson and TCC re rogs and rpds concerning construction.	Discovery (Non-Deposition)
8/27/2020	Mark Johnson	0.1	\$1,150	\$115	review BBK email re review and production of client documents	Discovery (Non-Deposition)
8/27/2020	Mark Johnson	0.3	\$1,150	\$345	email to RAB and coc re analysis of Stiner documents; criteria for redaction / privilege and non-production;	Discovery (Non-Deposition)
8/27/2020	Mark Johnson	3.7	\$1,150	\$4,255	continue and complete review of one set of Stiner documents for privilege and production; prepare spreadsheet re doc not to be produced.	Discovery (Non-Deposition)
8/27/2020	Rachel Steyer	1.5	\$750	\$1,125	completing draft declaration	Class Certification
8/27/2020	Rachel Steyer	2.6	\$750	\$1,950	drafting class member declaration	Class Certification
8/27/2020	Rachel Steyer	1.4	\$750	\$1,050	updated and reviewed intake with class member, followed up about additional quesitons	Class Outreach and Contact
8/27/2020	Rachel Steyer	0.8	\$750	\$600	answering questions, scheduling intakes, assessing strength of claims for intakes/declarations	Class Outreach and Contact
8/27/2020	Travis Close	1.3	\$850	\$1,105	Analyze Ds responses to Ps RFPs concerning efforts made to comply with ADA following today's call	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/27/2020	Travis Close	1.0	\$850	\$850	Review/analysis of Resident complaints — reports of suspected elder abuse — # BKD0060603-BKD0066796 (1-26 of 203)	Discovery (Non-Deposition)
8/27/2020	Travis Close	1.1	\$850	\$935	Review/analysis of Resident complaints — reports of suspected elder abuse — # BKD0066796-CDSS0043699 (26-53 of 203)	Discovery (Non-Deposition)
8/27/2020	Travis Close	1.0	\$850	\$850	Review/analysis of Resident complaints — reports of suspected elder abuse — # CDSS0043699-CDSS040858 (53-83 of 203)	Discovery (Non-Deposition)
8/27/2020	Travis Close	0.5	\$850	\$425	meet and confer call with MTJ and defendants re: responses to requests for construction/alteration records and efforts to comply with ADA	Discovery (Non-Deposition)
8/28/2020	Rachel Steyer	0.4	\$750	\$300	editing class member draft declaration	Class Certification
8/28/2020	Rachel Steyer	0.6	\$750	\$450	editing KAJ draft declaration	Class Certification
8/28/2020	Rachel Steyer	1.7	\$750	\$1,275	drafting class member declaration	Class Certification
8/28/2020	Rachel Steyer	1.6	\$750	\$1,200	continued intake with class member, scheduled f/u call to finish	Class Outreach and Contact
8/28/2020	Rachel Steyer	1.3	\$750	\$975	completed intake for class member, updated sharepoint	Class Outreach and Contact
8/28/2020	Rachel Steyer	0.2	\$750	\$150	confirming w/class member whether she wanted to participate in declaration drafting process	Class Outreach and Contact
8/28/2020	Rachel Steyer	0.4	\$750	\$300	partial intake with class member, creating client folder, called back again per his request and left VM	Class Outreach and Contact
8/28/2020	Rachel Steyer	0.2	\$750	\$150	returning calls, updating sharepoint, answering questions about the lawsuit, evaluating for potential strenght of intake/declaration	Class Outreach and Contact
8/28/2020	Rachel Steyer	0.6	\$750	\$450	reviewing docs received from class member, creating client doc folder, updating info into intake	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/28/2020	Travis Close	1.0	\$850	\$850	Review/analysis of Resident complaints — reports of suspected elder abuse — # BKD0129103-BKD0164464 (83-99 of 203)	Case Organization, Planning and Strategy
8/28/2020	Travis Close	1.0	\$850	\$850	Review/analysis of Resident complaints — reports of suspected elder abuse — # BKD0164464-BKD0166184 (99-118 of 203)	Case Organization, Planning and Strategy
8/28/2020	Travis Close	1.1	\$850	\$935	Review/analysis of Resident complaints — reports of suspected elder abuse — # BKD0166184-BKD0282404 (118-136 of 203)	Case Organization, Planning and Strategy
8/28/2020	Travis Close	0.3	\$850	\$255	Review/analyze communications re: metadata for Ps doc production	Discovery (Non-Deposition)
8/31/2020	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re status of discovery and materials produced by Defendants during 8/20; com's with GG re case schedule	Discovery (Non-Deposition)
8/31/2020	Mark Johnson	0.8	\$1,150	\$920	review final production sets for production of Stiner, Carlson and Schmidt documents - 1st set for rolling production.	Discovery (Non-Deposition)
8/31/2020	Mark Johnson	0.2	\$1,150	\$230	emails w/ COC and RAB re production of Stiner, Carlson and Schmidt documents	Discovery (Non-Deposition)
8/31/2020	Rachel Steyer	0.4	\$750	\$300	editing TSJ revised draft declaration	Class Certification
8/31/2020	Rachel Steyer	0.3	\$750	\$225	editing and incorporating track changes into TSJ draft declaration	Class Certification
8/31/2020	Rachel Steyer	0.3	\$750	\$225	editing TSJ draft declaration	Class Certification
8/31/2020	Rachel Steyer	0.6	\$750	\$450	editing KDL draft declaration	Class Certification
8/31/2020	Rachel Steyer	1.0	\$750	\$750	finalizing drafting and writing class member declaration	Class Certification
8/31/2020	Rachel Steyer	0.9	\$750	\$675	finalizing and reviewing class member draft declaration	Class Certification
8/31/2020	Rachel Steyer	0.3	\$750	\$225	received incoming/returning call from class member, scheduled intake	Class Outreach and Contact
8/31/2020	Rachel Steyer	0.5	\$750	\$375	phone call w/KAJ to review questions about outreach and declaration drafting	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/31/2020	Rachel Steyer	0.9	\$750	\$675	finalizing class member intake, updating sharepoint	Class Outreach and Contact
8/31/2020	Rachel Steyer	0.4	\$750	\$300	continued intake w/class member, reviewing last minute questions	Class Outreach and Contact
8/31/2020	Rachel Steyer	0.2	\$750	\$150	reviewing docs from class member, adding to client file	Discovery (Non-Deposition)
8/31/2020	Rachel Steyer	0.3	\$750	\$225	reviewing docs received from class member, creating client folder, updating info in intake	Discovery (Non-Deposition)
8/31/2020	Travis Close	1.3	\$850	\$1,105	Analyze sample of redacted files of Ps documents, to be produced to D, to ensure accuracy	Case Organization, Planning and Strategy
8/31/2020	Travis Close	0.7	\$850	\$595	Review/analyze transcript of 7-30 hearing for direction as to defendants' requirement to produce accessible transportation & evac policies	Case Organization, Planning and Strategy
8/31/2020	Travis Close	1.0	\$850	\$850	Review/analysis of Resident complaints — reports of suspected elder abuse — # BKD0282404-BKD0311062 (136-157 of 203)	Discovery (Non-Deposition)
8/31/2020	Travis Close	1.1	\$850	\$935	Review/analysis of Resident complaints — reports of suspected elder abuse — # BKD0311062-BKD0349276 (157-180 of 203)	Discovery (Non-Deposition)
8/31/2020	Travis Close	1.0	\$850	\$850	Review/analysis of Resident complaints — reports of suspected elder abuse — # BKD0349276- (180-203 of 203)	Discovery (Non-Deposition)
8/31/2020	Travis Close	0.2	\$850	\$170	Analyze MTJ's notes re: meet and confer call on Aug 27	Discovery (Non-Deposition)
9/1/2020	Mark Johnson	1.5	\$1,150	\$1,725	complete review of additional Stiner-related documents for production and for redaction or privilege review	Discovery (Non-Deposition)
9/1/2020	Mark Johnson	0.5	\$1,150	\$575	email exchanges w/ RAB re instructions for production of additional documents and for management of remaining documents	Discovery (Non-Deposition)
9/1/2020	Rachel Steyer	1.4	\$750	\$1,050	finishing drafting class member declaration	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/1/2020	Rachel Steyer	2.7	\$750	\$2,025	drafting class member declaration, updating sharepoint	Class Certification
9/1/2020	Rachel Steyer	0.3	\$750	\$225	reviewing and updating sharepoint intake and declaration tracking spreadsheet	Class Outreach and Contact
9/1/2020	Rachel Steyer	0.2	\$750	\$150	email to KDL w/question re potential declarant	Class Outreach and Contact
9/1/2020	Travis Close	1.0	\$850	\$850	Review/analysis of elder abuse policies & reports — # BKD0112486-BKD0145066 (1-16 of 570)	Discovery (Non-Deposition)
9/1/2020	Travis Close	1.1	\$850	\$935	Review/analysis of elder abuse policies & reports — # BKD0145066-BKD0161868 (16-34 of 570)	Discovery (Non-Deposition)
9/1/2020	Travis Close	1.0	\$850	\$850	Review/analysis of elder abuse policies & reports — # BKD0161868-BKD0164506 (34-50 of 570)	Discovery (Non-Deposition)
9/2/2020	Rachel Steyer	0.4	\$750	\$300	editing KAJ draft declaration	Class Certification
9/2/2020	Rachel Steyer	2.4	\$750	\$1,800	drafting class member declaration	Class Certification
9/2/2020	Rachel Steyer	0.3	\$750	\$225	partial intake w/class member	Class Outreach and Contact
9/2/2020	Rachel Steyer	0.3	\$750	\$225	email to KAJ w/draft declaration + comments	Class Outreach and Contact
9/2/2020	Rachel Steyer	0.9	\$750	\$675	class outreach, listening to voicemails, answering questions, filling in intakes	Class Outreach and Contact
9/2/2020	Rachel Steyer	0.4	\$750	\$300	attempted class outreach, leaving VMs, updating sharepoint	Class Outreach and Contact
9/2/2020	Rachel Steyer	0.2	\$750	\$150	reviewing relativity docs gathered by JAP for updated declarants, updated sharepoint	Discovery (Non-Deposition)
9/2/2020	Travis Close	0.6	\$850	\$510	Edits/revisions to draft declaration of Kim Stromwell by RLS	Case Organization, Planning and Strategy
9/2/2020	Travis Close	1.1	\$850	\$935	Review/analysis of elder abuse policies & reports — # BKD0164506-BKD0168096 (50-71 of 570)	Discovery (Non-Deposition)
9/2/2020	Travis Close	1.0	\$850	\$850	Review/analysis of elder abuse policies & reports — # BKD0168096-BKD0261544 (71-96 of 570)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/2/2020	Travis Close	1.0	\$850	\$850	Review/analysis of elder abuse policies & reports — # BKD0261544-BKD0261750 (96-118 of 570)	Discovery (Non-Deposition)
9/3/2020	Mark Johnson	1.7	\$1,150	\$1,955	review document productions, emails and prior notes, revise memo re status of outstanding discovery items.	Case Organization, Planning and Strategy
9/3/2020	Rachel Steyer	0.4	\$750	\$300	editing TSJ declaration	Class Certification
9/3/2020	Rachel Steyer	0.8	\$750	\$600	finished drafting class member declaration	Class Certification
9/3/2020	Rachel Steyer	1.8	\$750	\$1,350	completed intake with class member, created client folder, updated sharepoint	Class Outreach and Contact
9/3/2020	Rachel Steyer	0.3	\$750	\$225	called class member back for KDL, discussed case, determined not a good candidate for an intake, updated sharepoint	Class Outreach and Contact
9/3/2020	Rachel Steyer	0.2	\$750	\$150	call to class member to clarify question in intake	Class Outreach and Contact
9/3/2020	Rachel Steyer	0.9	\$750	\$675	partial intake with class member, concluded that claims were weak and not worth completing	Class Outreach and Contact
9/3/2020	Rachel Steyer	0.6	\$750	\$450	attempted class outreach, leaving VMs, updating sharepoint	Class Outreach and Contact
9/3/2020	Rachel Steyer	0.8	\$750	\$600	returning calls, answering questions about lawsuit, assessing strength of claims for intake/declaration, scheduling intakes	Class Outreach and Contact
9/3/2020	Travis Close	1.0	\$850	\$850	Review/analysis of elder abuse policies & reports — # BKD0261750-BKD0278253 (118-140 of 570)	Case Organization, Planning and Strategy
9/3/2020	Travis Close	1.0	\$850	\$850	Review/analysis of elder abuse policies & reports — # BKD0278253-BKD0282291 (140-165 of 570)	Case Organization, Planning and Strategy
9/4/2020	Guy Wallace	0.5	\$1,350	\$675	com's with GG; MTJ re discovery and extension of time to complete same	Discovery (Non-Deposition)
9/4/2020	Mark Johnson	0.1	\$1,150	\$115	email exchange w OC re supplementing response to doc request 20 re audits	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/4/2020	Mark Johnson	0.2	\$1,150	\$230	com w/ GBW re strategy for responding to D com re rog 11 re compliance with ADA / Unruh	Discovery (Non-Deposition)
9/4/2020	Travis Close	0.7	\$850	\$595	Analyze prior meet and confer efforts with respect to Requests For Production Nos. 16-18 & 20	Case Organization, Planning and Strategy
9/4/2020	Travis Close	0.4	\$850	\$340	Edits/revisions to draft declaration of Dale Breckenfeld by RLS	Case Organization, Planning and Strategy
9/4/2020	Travis Close	1.0	\$850	\$850	Review/analysis of elder abuse policies & reports — # BKD0282291-BKD0283223 (165-183 of 570)	Discovery (Non-Deposition)
9/4/2020	Travis Close	1.0	\$850	\$850	Review/analysis of elder abuse policies & reports — # BKD0283223-BKD0308796 (183-203 of 570)	Discovery (Non-Deposition)
9/4/2020	Travis Close	1.0	\$850	\$850	Review/analysis of elder abuse policies & reports — # BKD0308796-BKD0310281 (203-222 of 570)	Discovery (Non-Deposition)
9/4/2020	Travis Close	0.2	\$850	\$170	Review M/C email from opposing counsel re: further responses to Interrogatory #11	Discovery (Non-Deposition)
9/5/2020	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of meet and confer efforts re P.'s Interrogatories Nos. 9-11 and D.'s responses re same; preparation of list of further categories of information that D.'s should provide	Discovery (Non-Deposition)
9/6/2020	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of allegations of 3AC, preparation of highlighted version re same; com's with MTJ; TCC re meet and confer efforts with D.'s re Interrogatories Nos. 9-11 and need for adequate responsive information re same and D.'s ADA compliance efforts	Discovery (Non-Deposition)
9/8/2020	Guy Wallace	0.2	\$1,350	\$270	com's with MTJ re further meet and confer response to Maatman re D's incomplete responses to P.'s Interrogatories	Discovery (Non-Deposition)
9/8/2020	Mark Johnson	1.0	\$1,150	\$1,150	review sample of documents in relativity from 3 productions that include construction drawings, blueprints, etc.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/8/2020	Mark Johnson	0.6	\$1,150	\$690	emails to and from RAB, TCC, EO re directions for organizing docs re construction history and status of compliance w/ subpoenas seeking same.	Discovery (Non-Deposition)
9/8/2020	Mark Johnson	0.7	\$1,150	\$805	draft email to Santa Rosa City attorney spelling out position and basis for same re construction document subpoena; review statute, subpoena, prior correspondence and statistics re other production for same	Discovery (Non-Deposition)
9/8/2020	Rachel Steyer	0.4	\$750	\$300	editing TSJ draft declaration	Class Certification
9/8/2020	Rachel Steyer	0.2	\$750	\$150	email to TSJ with draft declaration and edits/comments	Class Certification
9/8/2020	Rachel Steyer	3.4	\$750	\$2,550	drafting class member declaration	Class Certification
9/8/2020	Rachel Steyer	0.2	\$750	\$150	reviewing tracking info of declaration drafting and intakes	Class Outreach and Contact
9/8/2020	Rachel Steyer	0.6	\$750	\$450	received call back from class member, assessed viability for intake/declaration, updated sharepoint	Class Outreach and Contact
9/8/2020	Rachel Steyer	0.2	\$750	\$150	reviewing additional emails forwarded from class member, adding to client file	Discovery (Non-Deposition)
9/8/2020	Rachel Steyer	0.6	\$750	\$450	reading through/reviewing additional emails forwarded from class member, adding to client folder	Discovery (Non-Deposition)
9/8/2020	Travis Close	0.5	\$850	\$425	Email to team re: management/organization of building records tracking	Case Organization, Planning and Strategy
9/8/2020	Travis Close	0.7	\$850	\$595	Analyze status of building records received from government agencies pursuant to subpoena	Case Organization, Planning and Strategy
9/8/2020	Travis Close	0.8	\$850	\$680	Review/analyze objections to subpoenas received to-date	Case Organization, Planning and Strategy
9/8/2020	Travis Close	1.0	\$850	\$850	Review/analysis of elder abuse policies & reports — #BKD0321966-BKD0342818 (249-277 of 570)	Case Organization, Planning and Strategy
9/8/2020	Travis Close	1.0	\$850	\$850	Review/analysis of elder abuse policies & reports — #BKD0310281-BKD0321966 (222-249 of 570)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/9/2020	Rachel Steyer	0.3	\$750	\$225	editing TSJ draft declaration	Class Certification
9/9/2020	Rachel Steyer	0.4	\$750	\$300	call with TSJ to discuss declaration edits	Class Certification
9/9/2020	Rachel Steyer	0.6	\$750	\$450	phone call with KAJ to discuss class member intake call conducted	Class Outreach and Contact
9/9/2020	Rachel Steyer	0.2	\$750	\$150	started to prepare intake with class member, attempted call and left VM	Class Outreach and Contact
9/9/2020	Rachel Steyer	0.6	\$750	\$450	conducted partial intake call w/class member, rescheduled, created client folder	Class Outreach and Contact
9/9/2020	Rachel Steyer	1.2	\$750	\$900	attempted class outreach, leaving VMs, updating sharepoint	Class Outreach and Contact
9/9/2020	Rachel Steyer	0.9	\$750	\$675	answering questions with class members about case, scheduling intakes, updating sharepoint, assessing strength of claims for potential intakes/declarations	Class Outreach and Contact
9/9/2020	Rachel Steyer	0.5	\$750	\$375	reviewing additional emails and documents forwarded from class member declarant, adding to client folder	Discovery (Non-Deposition)
9/9/2020	Travis Close	1.1	\$850	\$935	Review/analysis of elder abuse policies & reports — # - BKD0343996-BKD0345032 (295-318 of 570)	Case Organization, Planning and Strategy
9/9/2020	Travis Close	1.0	\$850	\$850	Review/analysis of elder abuse policies & reports — # - BKD0342818-BKD0343996 (277-295 of 570)	Discovery (Non-Deposition)
9/9/2020	Travis Close	1.0	\$850	\$850	Review/analysis of elder abuse policies & reports — # - BKD0345032-BKD0346077 (318-337 of 570)	Discovery (Non-Deposition)
9/10/2020	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re status of discovery and schedule re same	Discovery (Non-Deposition)
9/10/2020	Mark Johnson	0.2	\$1,150	\$230	review email and attachments from Titan re Santa Rosa documents; email to TCC re same	Discovery (Non-Deposition)
9/10/2020	Mark Johnson	0.8	\$1,150	\$920	second review of second proposed production of Stiner docs; com w/ RAB re same (.1)	Discovery (Non-Deposition)
9/10/2020	Mark Johnson	0.3	\$1,150	\$345	email exchanges (x4) w/ RAB re problems with certain document production bates numbers and metadata.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/10/2020	Mark Johnson	3.5	\$1,150	\$4,025	review document production since July and update overview spreadsheet with descriptions, bates ranges, production date; compare w/ D's representations re timing of production; email to GBW re same	Discovery (Non-Deposition)
9/10/2020	Rachel Steyer	0.2	\$750	\$150	call with class member, scheduled intake, answered questions about the case	Class Outreach and Contact
9/10/2020	Rachel Steyer	0.9	\$750	\$675	conducted partial intake, created client folder	Class Outreach and Contact
9/10/2020	Rachel Steyer	2.1	\$750	\$1,575	returning calls, answering questions about lawsuit, assessing class members for intakes/declarations, scheduling intakes, updating sharepoint	Class Outreach and Contact
9/10/2020	Rachel Steyer	1.0	\$750	\$750	attempted class outreach, leaving VMs, updating sharepoint	Class Outreach and Contact
9/10/2020	Rachel Steyer	3.9	\$750	\$2,925	intake call with class member, creating client folder, updating sharepoint	Class Outreach and Contact
9/10/2020	Travis Close	0.4	\$850	\$340	Email to RAB, EPO re: instructions for reviewing new City of Santa Rosa production	Case Organization, Planning and Strategy
9/10/2020	Travis Close	1.7	\$850	\$1,445	Preliminary analysis/review of production received from Santa Rosa to determine scope	Case Organization, Planning and Strategy
9/10/2020	Travis Close	0.2	\$850	\$170	Email to MTJ re: affidavit received from Santa Rosa/Titan	Case Organization, Planning and Strategy
9/10/2020	Travis Close	0.2	\$850	\$170	Email to Titan Legal Services re: status of compliance of building records subpoenas at Brentwood and Scotts Valley facilities	Case Organization, Planning and Strategy
9/10/2020	Travis Close	0.2	\$850	\$170	Analyze communications re: affidavit received from Santa Rosa via Titan	Discovery (Non-Deposition)
9/10/2020	Travis Close	0.4	\$850	\$340	Analyze status of building records subpoena compliance at Scotts Valley facility	Discovery (Non-Deposition)
9/10/2020	Travis Close	0.4	\$850	\$340	Analysis of emails received from City of Santa Rosa on access compliance at Chanate facility	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/10/2020	Travis Close	1.0	\$850	\$850	Review/analysis of elder abuse policies & reports — # - BKD0346077-BKD0346765 (337-352 of 570)	Discovery (Non-Deposition)
9/10/2020	Travis Close	1.0	\$850	\$850	Review/analysis of elder abuse policies & reports — # - BKD0346765-BKD0349859 (352-371 of 570)	Discovery (Non-Deposition)
9/10/2020	Travis Close	1.0	\$850	\$850	Review/analysis of elder abuse policies & reports — # - BKD0349859-BKD0357812 (371-390 of 570)	Discovery (Non-Deposition)
9/11/2020	Mark Johnson	0.2	\$1,150	\$230	com w/ GBW re pending discovery issues; D production since August	Discovery (Non-Deposition)
9/11/2020	Mark Johnson	0.1	\$1,150	\$115	review D's supplemental response to document request No. 20 re audits.	Discovery (Non-Deposition)
9/11/2020	Rachel Steyer	0.3	\$750	\$225	editing TSJ draft declaration	Class Certification
9/11/2020	Rachel Steyer	0.6	\$750	\$450	editing draft declaration CBM	Class Certification
9/11/2020	Rachel Steyer	0.4	\$750	\$300	editing KDL draft declaration	Class Certification
9/11/2020	Rachel Steyer	3.3	\$750	\$2,475	conducting class member intake, creating client folder, updating sharepoint	Class Outreach and Contact
9/11/2020	Rachel Steyer	0.7	\$750	\$525	conducted partial intake with class member, set up client folder, scheduled second intake appointment to continue	Class Outreach and Contact
9/11/2020	Travis Close	1.1	\$850	\$935	Review/analysis of elder abuse policies & reports — # - BKD0357812-BKD0378144 (390-411 of 570)	Case Organization, Planning and Strategy
9/11/2020	Travis Close	1.0	\$850	\$850	Review/analysis of elder abuse policies & reports — # - BKD0378144-BKD0401157 (411-444 of 570)	Discovery (Non-Deposition)
9/11/2020	Travis Close	1.0	\$850	\$850	Review/analysis of elder abuse policies & reports — # - BKD0401157-BKD1122770 (444-473 of 570)	Discovery (Non-Deposition)
9/14/2020	Travis Close	1.1	\$850	\$935	Review/analysis of elder abuse policies & reports — # - BKD1122770-BKD1125748 (473-489 of 570)	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/14/2020	Travis Close	1.0	\$850	\$850	Review/analysis of elder abuse policies & reports — # BKD1125748-BKD1152185 (489-515 of 570)	Case Organization, Planning and Strategy
9/14/2020	Travis Close	0.9	\$850	\$765	Review/analysis of elder abuse policies & reports — # BKD1152185-BKD1171524 (515-538 of 570)	Discovery (Non-Deposition)
9/15/2020	Guy Wallace	0.9	\$1,350	\$1,215	revise and edit letter and proposed search terms from MTJ to Maatman re ESI issues; review and analysis of status of D's production of documents; com's with MTJ re same (.3)	Discovery (Non-Deposition)
9/15/2020	Mark Johnson	0.1	\$1,150	\$115	review supplemental rog responses re new construction	Discovery (Non-Deposition)
9/15/2020	Mark Johnson	0.4	\$1,150	\$460	coms w/ experts, GBW, TCC re new construction information; research inspection history for comparison	Discovery (Non-Deposition)
9/15/2020	Mark Johnson	5.5	\$1,150	\$6,325	work on revised version of search terms, including integration of SCC edits and search terms prposed by Defendants; research document production of insight on same; review and incorporate suggestions from GBW; email to COC re same.	Discovery (Non-Deposition)
9/15/2020	Mark Johnson	0.4	\$1,150	\$460	revise, add to and finalize draft letter to OC re proposed search terms and custodians; incorporate edits from GBW	Discovery (Non-Deposition)
9/15/2020	Rachel Steyer	0.5	\$750	\$375	editing TSJ class member declaration	Class Certification
9/15/2020	Rachel Steyer	0.3	\$750	\$225	editing TSJ draft declaration	Class Certification
9/15/2020	Rachel Steyer	1.4	\$750	\$1,050	conducted partial intake with class member, created client folder, updated sharepoint	Class Outreach and Contact
9/15/2020	Rachel Steyer	0.8	\$750	\$600	partial intake with class member, rescheduled due to poor reception	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/15/2020	Rachel Steyer	1.6	\$750	\$1,200	conducted partial intake w/class member, scheduled f/u call, created client folder, updated sharepoint	Class Outreach and Contact
9/15/2020	Rachel Steyer	0.4	\$750	\$300	scheduling intakes, answering questions about litigation, assessing for strength of claims	Class Outreach and Contact
9/15/2020	Rachel Steyer	1.2	\$750	\$900	partial intake with class member, created client folder	Class Outreach and Contact
9/15/2020	Rachel Steyer	0.4	\$750	\$300	reviewing documents forwarded from class member, adding to client folder	Discovery (Non-Deposition)
9/15/2020	Travis Close	1.0	\$850	\$850	Review/analysis of elder abuse policies & reports — # BKD1171524-BKD1172518 (538-555 of 570)	Case Organization, Planning and Strategy
9/15/2020	Travis Close	0.3	\$850	\$255	Review/analyze Def's supplemental responses to first set of ROGs	Case Organization, Planning and Strategy
9/15/2020	Travis Close	0.9	\$850	\$765	Analyze records for first occupancy cited by Ds (bates numbered) in amended ROGs	Case Organization, Planning and Strategy
9/15/2020	Travis Close	1.0	\$850	\$850	Review/analysis of elder abuse policies & reports — # BKD1172518-BKD1173638 (555-570 of 570)	Discovery (Non-Deposition)
9/15/2020	Travis Close	1.0	\$850	\$850	Review and analysis targeted search -- ADA or "Americans with Disabilities Act" -- BKD0106549-BKD0177327 (1-22 of 495)	Discovery (Non-Deposition)
9/16/2020	Guy Wallace	0.2	\$1,350	\$270	com's with MTJ re meet and confer with Maatman re discovery; ESI issues	Discovery (Non-Deposition)
9/16/2020	Mark Johnson	0.1	\$1,150	\$115	email to COC re change in doc management system.	Class Certification
9/16/2020	Mark Johnson	1.0	\$1,150	\$1,150	further revisions to search terms and list of custodians and cover letter re same based on input from co-counsel; com w/ TCC re same, finalized and integrate cover letter and exhibits and send to OC	Discovery (Non-Deposition)
9/16/2020	Mark Johnson	0.3	\$1,150	\$345	review and analysis of meet and confer ltr from OC re responses and objections to D's document requests.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/16/2020	Mark Johnson	0.1	\$1,150	\$115	coms w/ TCC re tracking new info re new construction and packages of documents bearing on same.	Discovery (Non-Deposition)
9/16/2020	Mark Johnson	0.1	\$1,150	\$115	respond to AX email Q re redactions of confidential information in response to Ds document requests.	Discovery (Non-Deposition)
9/16/2020	Mark Johnson	0.8	\$1,150	\$920	review recent 9th circuit caselaw on standard for readily achievable in MSJ comtext	Other Motions
9/16/2020	Rachel Steyer	0.3	\$750	\$225	call w/TSJ to review comments/edits in draft declaration	Class Certification
9/16/2020	Rachel Steyer	0.5	\$750	\$375	editing TSJ draft declation	Class Certification
9/16/2020	Rachel Steyer	0.9	\$750	\$675	editing CBM draft declaration	Class Certification
9/16/2020	Rachel Steyer	0.2	\$750	\$150	email to CBM with feedback on draft declaration	Class Certification
9/16/2020	Rachel Steyer	1.1	\$750	\$825	drafting class member declaration	Class Certification
9/16/2020	Rachel Steyer	0.7	\$750	\$525	received call from class member; discussed case and experience, answered questions, scheduled intake	Class Outreach and Contact
9/16/2020	Rachel Steyer	2.0	\$750	\$1,500	intake call w/class member	Class Outreach and Contact
9/16/2020	Rachel Steyer	0.2	\$750	\$150	updating spreadsheet for relativity search	Discovery (Non-Deposition)
9/16/2020	Travis Close	0.7	\$850	\$595	Investigate whether any new Brookdale facilities have been recently divested	Case Organization, Planning and Strategy
9/16/2020	Travis Close	0.5	\$850	\$425	Review/analyze ninth circuit's recent decision in Lopez v. Catalina Channel articulating standard for readily achievable	Case Organization, Planning and Strategy
9/16/2020	Travis Close	0.6	\$850	\$510	Edits to M/C letter incorporating proposed search terms and additional proposed custodians	Discovery (Non-Deposition)
9/16/2020	Travis Close	0.2	\$850	\$170	Review/analyze edits to proposed search terms by SSC	Discovery (Non-Deposition)
9/16/2020	Travis Close	1.0	\$850	\$850	Review and analysis targeted search -- ADA or "Americans with Disabilities Act" -- BKD0177327-BKD0181603 (22-40 of 495)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/16/2020	Travis Close	1.1	\$850	\$935	Review and analysis targeted search -- ADA or "Americans with Disabilities Act" -- BKD0181603-BKD0204384 (40-61 of 495)	Discovery (Non-Deposition)
9/16/2020	Travis Close	1.0	\$850	\$850	Review and analysis targeted search -- ADA or "Americans with Disabilities Act" -- BKD0204384-BKD0211722 (61-79 of 495)	Discovery (Non-Deposition)
9/16/2020	Travis Close	0.3	\$850	\$255	Review/analyze Def's letter re: Ps objections to Ds interrogatories	Discovery (Non-Deposition)
9/17/2020	Mark Johnson	2.5	\$1,150	\$2,875	draft portions of ltr responding to OC letter concerning objection to D's document requests; legal research and review of pleadings for same.	Discovery (Non-Deposition)
9/17/2020	Mark Johnson	0.3	\$1,150	\$345	coms w/ TCC re damages section of ltr to OC re objections to Brookdale document requests; review /TCC draft of same.	Discovery (Non-Deposition)
9/17/2020	Rachel Steyer	1.2	\$750	\$900	drafting class member declaration	Class Certification
9/17/2020	Rachel Steyer	0.7	\$750	\$525	conducted partial intake w/class member, created client folder, updated sharepoint	Class Outreach and Contact
9/17/2020	Rachel Steyer	2.6	\$750	\$1,950	outreach w/class members, listening to VMs, returning missed calls, answering questions about case, assessing class members for potential strength of claims, scheduling intakes, updating sharepoint	Class Outreach and Contact
9/17/2020	Travis Close	1.7	\$850	\$1,445	Legal research re: obligations under Rule26 to produce evidence before class cert of damages	Case Organization, Planning and Strategy
9/17/2020	Travis Close	0.9	\$850	\$765	Draft section of M/C letter re: Ps response to Ds RFP No. 10	Case Organization, Planning and Strategy
9/17/2020	Travis Close	0.2	\$850	\$170	Email to MTJ re: responding to Ds argument concerning disclosure of damages prematurely	Discovery (Non-Deposition)
9/17/2020	Travis Close	0.3	\$850	\$255	Review/revise draft letter by MTJ responding to M/C re: disclosure of damages-based evidence	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/17/2020	Travis Close	1.0	\$850	\$850	Review and analysis targeted search -- ADA or "Americans with Disabilities Act" -- BKD0211722-BKD0222144 (79-96 of 495)	Discovery (Non-Deposition)
9/17/2020	Travis Close	1.0	\$850	\$850	Review and analysis targeted search -- ADA or "Americans with Disabilities Act" -- BKD0222144-BKD0222734 (96-113 of 495)	Discovery (Non-Deposition)
9/17/2020	Travis Close	1.0	\$850	\$850	Review and analysis targeted search -- ADA or "Americans with Disabilities Act" -- BKD0222734-BKD0225695 (113-133 of 495)	Discovery (Non-Deposition)
9/18/2020	Rachel Steyer	1.1	\$750	\$825	finishing drafting class member declaration	Class Certification
9/18/2020	Rachel Steyer	0.2	\$750	\$150	updating TSJ draft declaration, sending to GBW, TCC, MTJ	Class Certification
9/18/2020	Rachel Steyer	0.8	\$750	\$600	revising KDL draft declarations	Class Certification
9/18/2020	Rachel Steyer	0.2	\$750	\$150	email to KAJ, CBM, TSJ, KDL re outreach	Class Outreach and Contact
9/18/2020	Rachel Steyer	1.7	\$750	\$1,275	completed intake call w/class member, updated sharepoint	Class Outreach and Contact
9/18/2020	Rachel Steyer	1.2	\$750	\$900	completed intake with class member, created client folder, updated sharepoint	Class Outreach and Contact
9/18/2020	Rachel Steyer	0.4	\$750	\$300	leaving VMs, updating sharepoint	Class Outreach and Contact
9/18/2020	Rachel Steyer	1.2	\$750	\$900	answering questions, listening to VMs, returning missed calls, scheduling intakes, assessing for potential intakes/declarations	Class Outreach and Contact
9/18/2020	Travis Close	0.3	\$850	\$255	Further draft revisions on M/C letter to Ds re: Ps responses to RFPs	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/18/2020	Travis Close	0.2	\$850	\$170	Email to MTJ re: further revisions on M/C letter re: RFPs to Ps	Case Organization, Planning and Strategy
9/18/2020	Travis Close	1.1	\$850	\$935	Review and analysis targeted search -- ADA or "Americans with Disabilities Act" -- BKD0225695-BKD0227281 (133-156 of 495)	Discovery (Non-Deposition)
9/18/2020	Travis Close	1.0	\$850	\$850	Review and analysis targeted search -- ADA or "Americans with Disabilities Act" -- BKD0227281-BKD0228593 (156-183 of 495)	Discovery (Non-Deposition)
9/18/2020	Travis Close	1.0	\$850	\$850	Review and analysis targeted search -- ADA or "Americans with Disabilities Act" -- BKD0228593-BKD0229680 (183-208 of 495)	Discovery (Non-Deposition)
9/21/2020	Mark Johnson	0.2	\$1,150	\$230	email exchanges w/ TCC, RAB, EO re research for examples of documents establishing client disabilities for response to meet and confer ltr re responses to doc requests.	Discovery (Non-Deposition)
9/21/2020	Rachel Steyer	0.3	\$750	\$225	editing TSJ draft declaration	Class Certification
9/21/2020	Rachel Steyer	0.2	\$750	\$150	editing TSJ draft declaration	Class Certification
9/21/2020	Rachel Steyer	0.4	\$750	\$300	conducted partial intake, class member wanted to reschedule and speak w/his wife	Class Outreach and Contact
9/21/2020	Rachel Steyer	2.1	\$750	\$1,575	conducted intake w/class member, updated sharepoint, created client folder	Class Outreach and Contact
9/21/2020	Rachel Steyer	0.4	\$750	\$300	spoke w/class member re intake, she wanted to postpone/reschedule in order to discuss w/her father first	Class Outreach and Contact
9/21/2020	Rachel Steyer	1.6	\$750	\$1,200	class outreach: answering questions about the case, assessing strength of claims, scheduling intakes, returning missed calls, listening to VMs	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/21/2020	Travis Close	1.0	\$850	\$850	Review and analysis targeted search -- ADA or "Americans with Disabilities Act" -- BKD0229680-BKD0229891 (208-243 of 495)	Discovery (Non-Deposition)
9/21/2020	Travis Close	1.1	\$850	\$935	Review and analysis targeted search -- ADA or "Americans with Disabilities Act" -- BKD0229891-BKD0230653 (243-262 of 495)	Discovery (Non-Deposition)
9/21/2020	Travis Close	0.9	\$850	\$765	Review and analysis targeted search -- ADA or "Americans with Disabilities Act" -- BKD0230653-BKD0231446 (262-285 of 495)	Discovery (Non-Deposition)
9/22/2020	Guy Wallace	0.7	\$1,350	\$945	com's with GG; MTJ re status of discovery and approach to extension of schedule re class certification; analysis of same	Discovery (Non-Deposition)
9/22/2020	Mark Johnson	0.3	\$1,150	\$345	calls w/ GBW re status of discovery and outstanding issues for class cert, strategy for seeking additional extension of deadline to file class cert motion.	Class Certification
9/22/2020	Mark Johnson	0.3	\$1,150	\$345	call and emails w/ RAB re document searches re cleint's disabilities, issues with Relativity database	Discovery (Non-Deposition)
9/22/2020	Mark Johnson	0.1	\$1,150	\$115	review and circulate summary of status of discovery and spreadsheet of document production.	Discovery (Non-Deposition)
9/22/2020	Mark Johnson	0.8	\$1,150	\$920	review list of docs from EO/RAB substantiating clients' disabilities; review docs in relativity and search for additional docs; emails to/from co-counsel re history of production of non-BKD docs.	Discovery (Non-Deposition)
9/22/2020	Mark Johnson	0.5	\$1,150	\$575	review, revise, finalize and send ltr to OC responding to meet and confer ltr re responses to 1st set of document requests.	Discovery (Non-Deposition)
9/22/2020	Rachel Steyer	0.2	\$750	\$150	editing TSJ draft declaration	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/22/2020	Rachel Steyer	1.5	\$750	\$1,125	drafting class member declaration	Class Certification
9/22/2020	Rachel Steyer	0.2	\$750	\$150	scheduling F/U call w/class member, updating sharepoint	Class Outreach and Contact
9/22/2020	Rachel Steyer	2.4	\$750	\$1,800	completed intake w/class member, created client folder, updated sharepoint	Class Outreach and Contact
9/22/2020	Rachel Steyer	0.2	\$750	\$150	response to KAJ email	Class Outreach and Contact
9/22/2020	Rachel Steyer	0.5	\$750	\$375	phone call w/KAJ and class member to review claims and eligibility for class	Class Outreach and Contact
9/22/2020	Rachel Steyer	0.2	\$750	\$150	call w/KAJ answering question re class member	Class Outreach and Contact
9/22/2020	Rachel Steyer	0.4	\$750	\$300	phone call w/class member, determined not to conduct intake	Class Outreach and Contact
9/22/2020	Rachel Steyer	0.4	\$750	\$300	answering questions about the lawsuit, assessing for intakes, scheduling intakes, returning calls	Class Outreach and Contact
9/22/2020	Travis Close	0.8	\$850	\$680	Revisions/edits to declaration of Faunniel Ewers by TSJ	Case Organization, Planning and Strategy
9/22/2020	Travis Close	0.6	\$850	\$510	Analyze docs of Plaintiff Lindstrom to determine proof of disability/usage of cane	Case Organization, Planning and Strategy
9/22/2020	Travis Close	0.2	\$850	\$170	Email to MTJ re: status of plaintiff lindstrom's disability and proof for use of cane	Case Organization, Planning and Strategy
9/22/2020	Travis Close	1.0	\$850	\$850	Review and analysis targeted search -- ADA or "Americans with Disabilities Act" -- BKD0231446-BKD0249623 (285-303 of 495)	Discovery (Non-Deposition)
9/22/2020	Travis Close	1.1	\$850	\$935	Review and analysis targeted search -- ADA or "Americans with Disabilities Act" -- BKD0249623-BKD0261188 (303-323 of 495)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/22/2020	Travis Close	1.0	\$850	\$850	Review and analysis targeted search -- ADA or "Americans with Disabilities Act" -- BKD0261188-BKD0276536 (323-341 of 495)	Discovery (Non-Deposition)
9/22/2020	Travis Close	0.6	\$850	\$510	Edits/revisions to declaration of Michelle Mikell by RLS	Discovery (Non-Deposition)
9/23/2020	Guy Wallace	0.5	\$1,350	\$675	com's with RLS re preparation of class certification declarations of putative class members	Class Certification
9/23/2020	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ re D's further production of Residency Agreements in August and September 2020	Discovery (Non-Deposition)
9/23/2020	Mark Johnson	0.5	\$1,150	\$575	review Relativity database for estimate of number of Residency Agreements produced since August; coms w/ GBW re same	Discovery (Non-Deposition)
9/23/2020	Rachel Steyer	1.3	\$750	\$975	completed intake w/class member, created client folder, updated sharepoint	Class Outreach and Contact
9/23/2020	Rachel Steyer	2.5	\$750	\$1,875	conducted class member intake, created client folder, updated sharepoint	Class Outreach and Contact
9/23/2020	Rachel Steyer	0.7	\$750	\$525	assessing class members for intakes, answering questions about case, returning missed calls, listening to VMs	Class Outreach and Contact
9/23/2020	Travis Close	0.6	\$850	\$510	Analyze communications received from City of Brea re: building records subpoena	Discovery (Non-Deposition)
9/23/2020	Travis Close	1.0	\$850	\$850	Review and analysis targeted search -- ADA or "Americans with Disabilities Act" -- BKD0276536-BKD0295819 (341-360 of 495)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/23/2020	Travis Close	1.0	\$850	\$850	Review and analysis targeted search -- ADA or "Americans with Disabilities Act" -- BKD0295819-BKD0311184 (360-387 of 495)	Discovery (Non-Deposition)
9/23/2020	Travis Close	1.0	\$850	\$850	Review and analysis targeted search -- ADA or "Americans with Disabilities Act" -- BKD0311184-BKD0351438 (387-412 of 495)	Discovery (Non-Deposition)
9/24/2020	Rachel Steyer	0.4	\$750	\$300	editing KDL draft declaration	Class Certification
9/24/2020	Rachel Steyer	1.8	\$750	\$1,350	drafting class member declaration	Class Certification
9/24/2020	Rachel Steyer	1.3	\$750	\$975	drafting class member declaration	Class Certification
9/24/2020	Rachel Steyer	1.4	\$750	\$1,050	finished conducting intake with class member, updating sharepoint	Class Outreach and Contact
9/24/2020	Rachel Steyer	0.2	\$750	\$150	email to class member following intake requesting documents	Class Outreach and Contact
9/24/2020	Rachel Steyer	0.8	\$750	\$600	conducted partial intake w/class member, rescheduled for F/U	Class Outreach and Contact
9/24/2020	Rachel Steyer	0.3	\$750	\$225	received call back from class member, answered questions, scheduled intake	Class Outreach and Contact
9/24/2020	Travis Close	1.1	\$850	\$935	Review and analysis targeted search -- ADA or "Americans with Disabilities Act" -- BKD0351438-BKD1121949 (412-435 of 495)	Discovery (Non-Deposition)
9/24/2020	Travis Close	1.0	\$850	\$850	Review and analysis targeted search -- ADA or "Americans with Disabilities Act" -- BKD1121949-BKD1131999 (435-456 of 495)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/24/2020	Travis Close	0.9	\$850	\$765	Review and analysis targeted search -- ADA or "Americans with Disabilities Act" -- BKD1131999-BKD1214527 (456-475 of 495)	Discovery (Non-Deposition)
9/25/2020	Travis Close	1.0	\$850	\$850	Review and analysis targeted search -- ADA or "Americans with Disabilities Act" -- BKD1121949-BKD1236629 (475-495 of 495)	Discovery (Non-Deposition)
9/25/2020	Travis Close	1.3	\$850	\$1,105	Review and analysis -- (wheelchair or walker or cane) w/5 (door or closet or sink) # BKD0236339-BKD1237035 (1-27 of 27)	Discovery (Non-Deposition)
9/27/2020	Mark Johnson	1.8	\$1,150	\$2,070	draft ltr to OC re outstanding discovery and modificaiton of class cert schedule	Class Certification
9/27/2020	Mark Johnson	0.2	\$1,150	\$230	email exchange w/ GBW re stip to modify class cert schedule and letter re same	Class Certification
9/28/2020	Guy Wallace	0.5	\$1,350	\$675	revise and edit draft letter to Maatman prepared by MTJ; tc with MTJ re same	Communications With Opposing Counsel
9/28/2020	Mark Johnson	0.6	\$1,150	\$690	revise and finalize ltr to OC re potential modification of schedule	Case Organization, Planning and Strategy
9/28/2020	Mark Johnson	0.1	\$1,150	\$115	com w/GBW re ltr to OC re modification of schedule	Case Organization, Planning and Strategy
9/28/2020	Travis Close	1.0	\$850	\$850	Review and analysis -- wheelchair, walker, cane complaints -- # BKD0107002-BKD0317435 (#1-16 of 263)	Discovery (Non-Deposition)
9/28/2020	Travis Close	0.2	\$850	\$170	Review/analyze letter from MTJ re: scheduling case conference	Discovery (Non-Deposition)
9/29/2020	Rachel Steyer	1.2	\$750	\$900	finishing drafting class member declaration	Class Certification
9/29/2020	Rachel Steyer	0.2	\$750	\$150	finalizing/edits to class member declaration	Class Certification
9/29/2020	Rachel Steyer	2.2	\$750	\$1,650	drafting class member declaration	Class Certification
9/29/2020	Rachel Steyer	0.3	\$750	\$225	check in call w/class member	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/29/2020	Rachel Steyer	0.2	\$750	\$150	spoke w/class member following conversation w/RP	Class Outreach and Contact
9/29/2020	Rachel Steyer	1.2	\$750	\$900	conducted partial intake w/class member, created client folder, scheduled F/U call	Class Outreach and Contact
9/29/2020	Rachel Steyer	1.0	\$750	\$750	class outreach: scheduling intakes, answering questions about lawsuit, assessing for strength of claims for intake/declaration	Class Outreach and Contact
9/29/2020	Travis Close	0.2	\$850	\$170	Email to Titan re: coping building records for City of Santa Rosa	Discovery (Non-Deposition)
9/29/2020	Travis Close	0.2	\$850	\$170	Email to Santa Rosa re: processing coping in house of building records	Discovery (Non-Deposition)
9/29/2020	Travis Close	0.6	\$850	\$510	Analyze letter from Ds re: Def's requests for documents Nos 2, 3, and 7	Discovery (Non-Deposition)
9/29/2020	Travis Close	1.1	\$850	\$935	Review and analysis -- wheelchair, walker, cane complaints -- # BKD0317435-BKD1119181 (#16-37 of 263)	Discovery (Non-Deposition)
9/29/2020	Travis Close	1.0	\$850	\$850	Review and analysis -- wheelchair, walker, cane complaints -- # BKD1119181-BKD1122814 (#37-57 of 263)	Discovery (Non-Deposition)
9/29/2020	Travis Close	1.0	\$850	\$850	Review and analysis -- wheelchair, walker, cane complaints -- # BKD1122814-BKD1123732 (57-72 of 263)	Discovery (Non-Deposition)
9/30/2020	Rachel Steyer	1.4	\$750	\$1,050	completing draft declaration	Class Certification
9/30/2020	Rachel Steyer	2.3	\$750	\$1,725	drafting class member declaration	Class Certification
9/30/2020	Rachel Steyer	1.2	\$750	\$900	completed class member intake, updated sharepoint	Class Outreach and Contact
9/30/2020	Rachel Steyer	1.5	\$750	\$1,125	conducted partial intake call w/class member, created client folder, scheduled F/U call	Class Outreach and Contact
9/30/2020	Rachel Steyer	0.7	\$750	\$525	conducted partial intake w/class member, scheduled F/U call	Class Outreach and Contact
9/30/2020	Rachel Steyer	0.2	\$750	\$150	email to KDL re prospective declarant	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/30/2020	Travis Close	0.2	\$850	\$170	Email to Sandi (@ Santa Rosa) re: doc production from city	Discovery (Non-Deposition)
9/30/2020	Travis Close	0.2	\$850	\$170	Email to team re: responding to OC's letter on Ps discovery	Discovery (Non-Deposition)
9/30/2020	Travis Close	1.0	\$850	\$850	Review and analysis -- wheelchair, walker, cane complaints -- # BKD1123732-BKD1138734 (72-90 of 263)	Discovery (Non-Deposition)
9/30/2020	Travis Close	1.0	\$850	\$850	Review and analysis -- wheelchair, walker, cane complaints -- # BKD1138734-BKD1148606 (90-109 of 263)	Discovery (Non-Deposition)
10/1/2020	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re D's proposed stipulation re schedule on class certification; review and analysis of same	Class Certification
10/1/2020	Guy Wallace	0.7	\$1,350	\$945	review and analysis of draft of proposed stipulation and order from MTJ; revise and edit same; com's with GG; MTJ re same	Class Certification
10/1/2020	Mark Johnson	1.1	\$1,150	\$1,265	review email for D re proposed extension of class cert deadline and draft stipulation; draft revisions to stipulation; coms w/ GBW re same and make further revisions; draft cover email; coms w/GCG re package	Case Organization, Planning and Strategy
10/1/2020	Rachel Steyer	0.4	\$750	\$300	reviewing class member residency agreement, updating dates and figures in draft declaration	Class Certification
10/1/2020	Rachel Steyer	0.9	\$750	\$675	completing class member draft declaration	Class Certification
10/1/2020	Rachel Steyer	1.0	\$750	\$750	drafting class member declaration	Class Certification
10/1/2020	Rachel Steyer	0.3	\$750	\$225	partial intake w/class member, rescheduled so that class member can verify when relative lived at Brookdale	Class Outreach and Contact
10/1/2020	Rachel Steyer	0.2	\$750	\$150	verifying details w/class member re declaration and residency agreement	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/1/2020	Rachel Steyer	1.8	\$750	\$1,350	conducted intake call w/class member, updated sharepoint, created client folder	Class Outreach and Contact
10/1/2020	Rachel Steyer	0.5	\$750	\$375	attempted class member outreach, leaving VMs	Class Outreach and Contact
10/1/2020	Rachel Steyer	0.7	\$750	\$525	listening to VMs, assessing strenght of claims, returning calls, scheduling intakes	Class Outreach and Contact
10/1/2020	Travis Close	0.6	\$850	\$510	Begin searching for proof of disabilities from docs in possession by plaintiff	Discovery (Non-Deposition)
10/1/2020	Travis Close	1.0	\$850	\$850	Review and analysis -- wheelchair, walker, cane complaints # BKD1158139-BKD1180372 (125-143 of 263)	Discovery (Non-Deposition)
10/2/2020	Guy Wallace	0.2	\$1,350	\$270	review and analysis of email from Maatman re class cert schedule; com with MTJ re same	Class Certification
10/2/2020	Rachel Steyer	0.8	\$750	\$600	editing and reviewing KDL draft declaration	Class Certification
10/2/2020	Rachel Steyer	0.5	\$750	\$375	conducted partial intake, determined not to proceed forward with questionnaire given lack of strong claims	Class Outreach and Contact
10/2/2020	Rachel Steyer	0.2	\$750	\$150	spoke w/class member, determined she did not wish to conduct intake	Class Outreach and Contact
10/2/2020	Rachel Steyer	0.4	\$750	\$300	conducted partial intake w/class member, wanted to reschedule to get her files first, created client folder	Class Outreach and Contact
10/2/2020	Rachel Steyer	3.5	\$750	\$2,625	returning missed calls, answering questions about lawsuit, assessing for strength of claims, scheduling intakes	Class Outreach and Contact
10/2/2020	Travis Close	0.4	\$850	\$340	Review/analyze proposed stip from defendants re: continuance of class cert deadline	Discovery (Non-Deposition)
10/2/2020	Travis Close	1.6	\$850	\$1,360	Analyze plaintiffs' files for evidence of disability (Stacia stiner)	Discovery (Non-Deposition)
10/2/2020	Travis Close	0.3	\$850	\$255	Analyze def's counter proposal re: expert discovery/disclosures	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/2/2020	Travis Close	1.3	\$850	\$1,105	Research requirement to be impaired in "major life activities" under ADA and whether that includes assistance with "activities of daily living"	Discovery (Non-Deposition)
10/2/2020	Travis Close	0.4	\$850	\$340	Review requirements for proving disability under ADAAA of 2008	Discovery (Non-Deposition)
10/2/2020	Travis Close	1.0	\$850	\$850	Review and analysis -- wheelchair, walker, cane complaints # BKD1180372-BKD1218561 (143-164 of 263)	Discovery (Non-Deposition)
10/2/2020	Travis Close	1.5	\$850	\$1,275	Legal research re: who is a qualified individual under ADA	Pleadings and Motions Re: Pleadings
10/4/2020	Mark Johnson	0.2	\$1,150	\$230	email exchanges w/ COC re further production of documents from named plaintiffs	Discovery (Non-Deposition)
10/5/2020	Rachel Steyer	1.3	\$750	\$975	drafting class member declaration	Class Certification
10/5/2020	Rachel Steyer	0.5	\$750	\$375	speaking w/class member, answering questions, agreed to set up time for intake	Class Outreach and Contact
10/5/2020	Rachel Steyer	1.4	\$750	\$1,050	conducted partial intake w/class member, created client folder, scheduled f/u call	Class Outreach and Contact
10/5/2020	Rachel Steyer	1.0	\$750	\$750	completed class member intake, updated sharepoint	Class Outreach and Contact
10/5/2020	Rachel Steyer	2.1	\$750	\$1,575	conducting intake w/class member, creating client folder	Class Outreach and Contact
10/5/2020	Rachel Steyer	0.2	\$750	\$150	listened to VM, returned missed call to class member	Class Outreach and Contact
10/5/2020	Rachel Steyer	0.8	\$750	\$600	listened to VM, returned missed call, answered questions about the case, scheduled intake	Class Outreach and Contact
10/5/2020	Travis Close	0.3	\$850	\$255	Call to Steve Miller (class member) re: status of declaration	Class Outreach and Contact
10/5/2020	Travis Close	1.7	\$850	\$1,445	Analyze evidence of disabilities in current records -- Plaintiff Helen Carlson	Discovery (Non-Deposition)
10/5/2020	Travis Close	1.9	\$850	\$1,615	Analyze evidence of disabilities in current records -- Plaintiff Lawrence Quinlan	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/5/2020	Travis Close	1.1	\$850	\$935	Review and analysis -- wheelchair, walker, cane complaints # BKD1218561-BKD1226917 (164-181 of 263)	Discovery (Non-Deposition)
10/5/2020	Travis Close	1.0	\$850	\$850	Review and analysis -- wheelchair, walker, cane complaints # BKD1226917-BKD1230570 (181-200 of 263)	Discovery (Non-Deposition)
10/5/2020	Travis Close	1.0	\$850	\$850	Review and analysis -- wheelchair, walker, cane complaints # BKD1230570-BKD1237036 (200-216 of 263)	Discovery (Non-Deposition)
10/6/2020	Guy Wallace	0.4	\$1,350	\$540	revise and edit draft stipulation re schedule on class certification; com's with MTJ re same	Class Certification
10/6/2020	Mark Johnson	1.3	\$1,150	\$1,495	review counter-proposal from OC re stip to extend deadlines for class cert reply and incorporate dates for expert exchanges; com w/ GBW re same (.1); draft cover email; review and incorporate edits from GBW	Case Organization, Planning and Strategy
10/6/2020	Rachel Steyer	0.8	\$750	\$600	editing and reviewing CBM class member draft declaration	Class Certification
10/6/2020	Rachel Steyer	1.0	\$750	\$750	drafting clas member declaration	Class Certification
10/6/2020	Rachel Steyer	0.2	\$750	\$150	attempted to conduct class member intake, got cut off, called back and left VM	Class Outreach and Contact
10/6/2020	Rachel Steyer	0.8	\$750	\$600	phone call w/class member and son--discussed the case, answered questions, wanted to set up F/U time to discuss	Class Outreach and Contact
10/6/2020	Rachel Steyer	3.0	\$750	\$2,250	completed class member intake, updated sharepoint	Class Outreach and Contact
10/6/2020	Rachel Steyer	0.9	\$750	\$675	attempted class outreach, leaving VMs	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/6/2020	Rachel Steyer	1.1	\$750	\$825	contact with class members, answering questions, assessing for strenght of claims, scheduling intakes	Class Outreach and Contact
10/6/2020	Travis Close	1.8	\$850	\$1,530	Analyze evidence of disabilities in current records -- Edward Boris (Michele Lytle)	Discovery (Non-Deposition)
10/6/2020	Travis Close	1.7	\$850	\$1,445	Analyze evidence of disabilities in current records -- Edward Boris (Michele Lytle)	Discovery (Non-Deposition)
10/6/2020	Travis Close	1.0	\$850	\$850	Review and analysis -- wheelchair, walker, cane complaints # BKD1237036-BKD1282423 (216-231 of 263)	Discovery (Non-Deposition)
10/6/2020	Travis Close	1.1	\$850	\$935	Review and analysis -- wheelchair, walker, cane complaints # BKD1282423-BKD1292600 (231-246 of 263)	Discovery (Non-Deposition)
10/6/2020	Travis Close	1.0	\$850	\$850	Review and analysis -- wheelchair, walker, cane complaints #BKD1292600 -BKD1299786 (246-263 of 263)	Discovery (Non-Deposition)
10/6/2020	Travis Close	0.4	\$850	\$340	Analyze counterproposal by Defs re: extension of case schedule, deadline to amend pleadings, expert discovery	Pleadings and Motions Re: Pleadings
10/7/2020	Mark Johnson	1.8	\$1,150	\$2,070	work on draft ltr to OC responding to demand for further responses to docs re disability and communications	Discovery (Non-Deposition)
10/7/2020	Rachel Steyer	0.7	\$750	\$525	editing and reviewed KAJ draft declaration	Class Certification
10/7/2020	Rachel Steyer	0.7	\$750	\$525	continued partial intake w/class member, had to reschedule to continue conversation	Class Outreach and Contact
10/7/2020	Rachel Steyer	1.6	\$750	\$1,200	completed intake w/class member, updated sharepoint	Class Outreach and Contact
10/7/2020	Rachel Steyer	1.3	\$750	\$975	attempted outreach, leaving VMs	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/7/2020	Rachel Steyer	1.0	\$750	\$750	outreach to class members, answering questions about the case, assessing for strength of claims, scheduling intakes	Class Outreach and Contact
10/7/2020	Travis Close	1.9	\$850	\$1,615	Analyze evidence of disabilities in current records -- Arthur Lindstrom (Patricia Lindstrom)	Discovery (Non-Deposition)
10/7/2020	Travis Close	1.0	\$850	\$850	Review and analysis - door, hallway, threshold, step trouble -- # BKD0128589-BKD1209827 (1-16 of 49)	Discovery (Non-Deposition)
10/7/2020	Travis Close	0.9	\$850	\$765	Review and analysis - door, hallway, threshold, step trouble -- # BKD1209827-BKD1237036 (16-33 of 49)	Discovery (Non-Deposition)
10/7/2020	Travis Close	1.0	\$850	\$850	Review and analysis - door, hallway, threshold, step trouble -- # BKD1237036-BKD1299449 (33-49 of 49)	Discovery (Non-Deposition)
10/7/2020	Travis Close	0.4	\$850	\$340	Review/analyze draft counter proposal by MTJ to stip regarding case schedule & class cert	Pleadings and Motions Re: Pleadings
10/7/2020	Travis Close	0.2	\$850	\$170	Review allegations in complaint re: status of plaintiff bernie jestrabek-hart's disability	Pleadings and Motions Re: Pleadings
10/7/2020	Travis Close	1.7	\$850	\$1,445	Analyze evidence of disabilities in current records -- Arthur Lindstrom (Berni Jestrabek-Hart)	Pleadings and Motions Re: Pleadings
10/8/2020	Mark Johnson	3.7	\$1,150	\$4,255	continue working on and finalize draft of ltr respoding to demand for further production of docs provig disabiliity and coms w/ putative class members	Discovery (Non-Deposition)
10/8/2020	Mark Johnson	0.3	\$1,150	\$345	email exchanges w/ R Steyer re gathering information for privilege log concerning coms w/ putative class members; questions re particular types of communications; timing for same	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/8/2020	Mark Johnson	0.4	\$1,150	\$460	email memo to COC with draft ltr to Maatman re further production of docs showing Ps' disabilities; coms w/ putative class members, gathering of docs and examples of docs already produced; gathering of coms for preparation of privilege log.	Discovery (Non-Deposition)
10/8/2020	Rachel Steyer	0.7	\$750	\$525	reviewing and editing CBM draft declaration	Class Certification
10/8/2020	Rachel Steyer	0.2	\$750	\$150	email to CBM with draft declaraiton and edits	Class Certification
10/8/2020	Rachel Steyer	0.2	\$750	\$150	reviewing sharepoint info/declaration tracking sheet	Class Outreach and Contact
10/8/2020	Rachel Steyer	0.2	\$750	\$150	email to class member w/contact info and class member letter	Class Outreach and Contact
10/8/2020	Rachel Steyer	0.2	\$750	\$150	call w/CBM to review question about declarant	Class Outreach and Contact
10/8/2020	Rachel Steyer	0.3	\$750	\$225	email to MTJ, TCC, GBW re privilege log	Class Outreach and Contact
10/8/2020	Rachel Steyer	2.3	\$750	\$1,725	attempted class outreach, leaving VMs, updating sharepoint	Class Outreach and Contact
10/8/2020	Rachel Steyer	3.5	\$750	\$2,625	speaking with class members about lawsuit, answering questions, assessing for strength of claims, scheduling intakes	Class Outreach and Contact
10/8/2020	Rachel Steyer	0.2	\$750	\$150	adding class member emails and documents to folder, reviewing	Discovery (Non-Deposition)
10/8/2020	Travis Close	1.9	\$850	\$1,615	Analyze evidence of disabilities in current records -- Jeanette Algarme	Discovery (Non-Deposition)
10/8/2020	Travis Close	1.0	\$850	\$850	Review and analysis - entrance, exit, common areas, pool, fire escape troubles -- # BKD0164549-BKD1109591 (1-17 of 51)	Discovery (Non-Deposition)
10/8/2020	Travis Close	1.0	\$850	\$850	Review and analysis - entrance, exit, common areas, pool, fire escape troubles -- # BKD1109591-BKD1165311 (17-35 of 51)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/8/2020	Travis Close	1.0	\$850	\$850	Review and analysis - entrance, exit, common areas, pool, fire escape troubles -- # BKD1165311-BKD1237035 (35-51 of 51)	Discovery (Non-Deposition)
10/8/2020	Travis Close	1.4	\$850	\$1,190	Research types of evidence probative of plaintiff's disabilities in ninth circuit	Pleadings and Motions Re: Pleadings
10/9/2020	Rachel Steyer	0.2	\$750	\$150	call w/CMBM re declaration drafting	Class Certification
10/9/2020	Rachel Steyer	0.7	\$750	\$525	editing KAJ draft declaration	Class Certification
10/9/2020	Rachel Steyer	0.5	\$750	\$375	reviewing and editing CBM draft declaration	Class Certification
10/9/2020	Rachel Steyer	0.9	\$750	\$675	conducted partial intake call w/class member, created client folder, scheduled F/U call	Class Outreach and Contact
10/9/2020	Rachel Steyer	0.6	\$750	\$450	conducted partial intake, created client folder, rescheduled intake for later date	Class Outreach and Contact
10/9/2020	Rachel Steyer	0.7	\$750	\$525	conducted partial intake w/class member, created client folder, scheduled F/U cal	Class Outreach and Contact
10/9/2020	Rachel Steyer	0.2	\$750	\$150	received call back from class member, scheduled intake	Class Outreach and Contact
10/9/2020	Rachel Steyer	1.5	\$750	\$1,125	completed intake w/class member, updated sharepoint	Class Outreach and Contact
10/9/2020	Rachel Steyer	0.2	\$750	\$150	check in call w/class member, scheduled intake call	Class Outreach and Contact
10/9/2020	Rachel Steyer	1.9	\$750	\$1,425	finished intake with class member, updated sharepoint	Class Outreach and Contact
10/9/2020	Rachel Steyer	0.4	\$750	\$300	reviewing emails and letter from MTJ related to discovery disputes with opposing counsel	Discovery (Non-Deposition)
10/9/2020	Rachel Steyer	0.2	\$750	\$150	email to KAJ, TSJ, KDL, CMBM, BCR re creation of privilege logs	Discovery (Non-Deposition)
10/9/2020	Rachel Steyer	0.6	\$750	\$450	reviewing additional emails, adding to resident document file, updating intake	Discovery (Non-Deposition)
10/9/2020	Travis Close	1.7	\$850	\$1,445	Reserch cases where court found proof of disability sufficient after passage of ADA Amendments act in 2008	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/9/2020	Travis Close	1.0	\$850	\$850	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD0195299-BKD0324598 (1-21 of 1271)	Discovery (Non-Deposition)
10/9/2020	Travis Close	1.0	\$850	\$850	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD0324598-BKD1120955 (21-39 of 1271)	Discovery (Non-Deposition)
10/9/2020	Travis Close	0.8	\$850	\$680	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1120955-BKD1122486 (39-59 of 1271)	Discovery (Non-Deposition)
10/9/2020	Travis Close	0.2	\$850	\$170	Email to team re: docs evidencing plaintiff boris' disabilities	Pleadings and Motions Re: Pleadings
10/12/2020	Guy Wallace	0.7	\$1,350	\$945	com's with GG; MTJ; RLS re preparation of class certification motion, expert declarations, class member declarations and schedule re same	Class Certification
10/12/2020	Mark Johnson	0.5	\$1,150	\$575	call w/ GBW and GCG re case status, timeline, tasks for class cert and timing, allocation of work, discovery issues	Case Organization, Planning and Strategy
10/12/2020	Mark Johnson	0.1	\$1,150	\$115	follow up w. GBW re case schedule, class cert mtn	Case Organization, Planning and Strategy
10/12/2020	Mark Johnson	0.1	\$1,150	\$115	coms w/ OC re stipulation to extend class cert reply deadline	Class Certification
10/12/2020	Mark Johnson	1.0	\$1,150	\$1,150	complete and finalize ltr to OC re responses to 1st set of Ds doc requests; identify and include examples of docs already produced; com w/ RAB re availability of docs in Relativity	Discovery (Non-Deposition)
10/12/2020	Rachel Steyer	0.5	\$750	\$375	reviewing class member emails and updating draft declaration	Class Certification
10/12/2020	Rachel Steyer	0.7	\$750	\$525	reviewing and revising CMBM draft declaration	Class Certification
10/12/2020	Rachel Steyer	0.5	\$750	\$375	received call back from class member, discussed case, assessed for claims	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/12/2020	Rachel Steyer	1.4	\$750	\$1,050	finished class member intake, updated sharepoint	Class Outreach and Contact
10/12/2020	Rachel Steyer	0.4	\$750	\$300	reading emails from class member, updating info accordingly in intake	Class Outreach and Contact
10/12/2020	Rachel Steyer	0.2	\$750	\$150	reviewing and adding client's resident docs to client folder	Discovery (Non-Deposition)
10/12/2020	Rachel Steyer	0.2	\$750	\$150	email response to KAJ, BCR, CMBM, TSJ, KDL re organizing docs for privilege logs	Discovery (Non-Deposition)
10/12/2020	Rachel Steyer	0.8	\$750	\$600	work on privilege log	Discovery (Non-Deposition)
10/12/2020	Travis Close	1.3	\$850	\$1,105	Analyze and update database of DSS violations/complaints against Brookdale facilities (Anaheim-Clairemont)	Case Organization, Planning and Strategy
10/12/2020	Travis Close	1.4	\$850	\$1,190	Investigate/update recent DSS violations/complaints against Brookdale facilities (Corona-Irvine)	Case Organization, Planning and Strategy
10/12/2020	Travis Close	0.7	\$850	\$595	Analyze additional docs received from City of Santa Rosa for completeness	Discovery (Non-Deposition)
10/12/2020	Travis Close	1.0	\$850	\$850	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1122486-BKD1167586 (59-81 of 1271)	Discovery (Non-Deposition)
10/12/2020	Travis Close	1.0	\$850	\$850	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1167586-BKD1168168 (81-102 of 1271)	Discovery (Non-Deposition)
10/12/2020	Travis Close	0.9	\$850	\$765	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1168168-BKD1168808 (102-125 of 1271)	Discovery (Non-Deposition)
10/13/2020	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re schedule on class certification and com's with Maatman re same and next steps re potential submission to MJ Beeler	Class Certification
10/13/2020	Mark Johnson	0.3	\$1,150	\$345	com w/ GBW re class cert schedule and review history of communmictions on schedule and ESI search.	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/13/2020	Rachel Steyer	0.4	\$750	\$300	editing KAJ draft declaration	Class Certification
10/13/2020	Rachel Steyer	0.5	\$750	\$375	editing CMBM draft declaration	Class Certification
10/13/2020	Rachel Steyer	0.2	\$750	\$150	f/u call with class member, not interested in conducting intake	Class Outreach and Contact
10/13/2020	Rachel Steyer	0.2	\$750	\$150	partial intake w/class member, rescheduled to allow her time to locate documents, created client folder	Class Outreach and Contact
10/13/2020	Rachel Steyer	0.3	\$750	\$225	email to class member w/list of docs to look for	Class Outreach and Contact
10/13/2020	Rachel Steyer	2.9	\$750	\$2,175	work on privilege log	Discovery (Non-Deposition)
10/13/2020	Travis Close	0.8	\$850	\$680	Investigate recent change of ownership at facility (Red Bluff)	Case Organization, Planning and Strategy
10/13/2020	Travis Close	0.7	\$850	\$595	Investigate recent change of ownership at facility (Grand Terrace)	Case Organization, Planning and Strategy
10/13/2020	Travis Close	0.6	\$850	\$510	Investigate recent facility change of ownership: Brookdale San Dimas	Case Organization, Planning and Strategy
10/13/2020	Travis Close	1.2	\$850	\$1,020	Investigate/update recent DSS violations/complaints against Brookdale facilities (Rancho Mirage-South Tarzana)	Case Organization, Planning and Strategy
10/13/2020	Travis Close	1.3	\$850	\$1,105	Investigate/update recent DSS violations/complaints against Brookdale facilities (Irvine-Rancho Mirage)	Discovery (Non-Deposition)
10/13/2020	Travis Close	1.1	\$850	\$935	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1168808-BKD1169443 (125-148 of 1271)	Discovery (Non-Deposition)
10/13/2020	Travis Close	1.0	\$850	\$850	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1169443-BKD1170046 (148-170 of 1271)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/13/2020	Travis Close	1.0	\$850	\$850	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1170046-BKD1181980 (170-194 of 1271)	Discovery (Non-Deposition)
10/14/2020	Guy Wallace	1.3	\$1,350	\$1,755	review and analysis of draft class cert declarations re putative class members with mobility and/or vision disabilities; com's with Waters re physical barriers re same; RLS and MTJ re revisions thereto	Class Certification
10/14/2020	Rachel Steyer	0.3	\$750	\$225	email to Brookdale outreach team (KDL, CMBM, KAJ, TSJ) re changes to declaration drafting to come and organization	Case Organization, Planning and Strategy
10/14/2020	Rachel Steyer	0.2	\$750	\$150	email to TRB re updates to sharepoint	Class Outreach and Contact
10/14/2020	Rachel Steyer	1.8	\$750	\$1,350	conducted intake with class member	Class Outreach and Contact
10/14/2020	Rachel Steyer	0.2	\$750	\$150	reviewing CMBM draft declaration	Discovery (Non-Deposition)
10/14/2020	Travis Close	0.8	\$850	\$680	Investigate recent facility change of ownership: Brookdale Yorba Linda	Case Organization, Planning and Strategy
10/14/2020	Travis Close	0.4	\$850	\$340	Amend master facility spreadsheet with new facility names for former Brookdale facilities	Case Organization, Planning and Strategy
10/14/2020	Travis Close	1.4	\$850	\$1,190	Investigate/update recent DSS violations/complaints against Brookdale facilities (South Tarzana-Yorba Linda)	Case Organization, Planning and Strategy
10/14/2020	Travis Close	1.0	\$850	\$850	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1181980-BKD1185434 (194-214 of 1271)	Discovery (Non-Deposition)
10/14/2020	Travis Close	1.0	\$850	\$850	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1185434-BKD1185984 (214-233 of 1271)	Discovery (Non-Deposition)
10/14/2020	Travis Close	1.0	\$850	\$850	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1185984-BKD1186742 (233-254 of 1271)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/15/2020	Guy Wallace	1.3	\$1,350	\$1,755	revise and edit draft class cert declaration re class members with mobility and/or visual impairments; com's with RLS; TCC; MTJ re same	Class Certification
10/15/2020	Guy Wallace	0.2	\$1,350	\$270	com's with MTJ re discovery re class members with disabilities	Discovery (Non-Deposition)
10/15/2020	Mark Johnson	0.3	\$1,150	\$345	com w/ GBW re discovery plans, class cert plans on access claims	Case Organization, Planning and Strategy
10/15/2020	Mark Johnson	1.8	\$1,150	\$2,070	locate and review discovery and responses on identifications of PWDs, data re same; email w/ GBW, TCC, RS re same; emails w/ RAB re locating and producing data with same	Discovery (Non-Deposition)
10/15/2020	Mark Johnson	0.7	\$1,150	\$805	research definitions for visual impairment / blindness for rogs; com w/ /gbw re same and re draft rogs.	Discovery (Non-Deposition)
10/15/2020	Rachel Steyer	0.2	\$750	\$150	reviewing GBW edits to ADA declaration template, accepting changes	Class Certification
10/15/2020	Rachel Steyer	0.7	\$750	\$525	researching meaning of vision disability w/in ADA	Class Certification
10/15/2020	Rachel Steyer	0.3	\$750	\$225	received call back from class member, scheduled intake	Class Outreach and Contact
10/15/2020	Rachel Steyer	0.7	\$750	\$525	continued partial intake w/class member, scheduled F/U call	Class Outreach and Contact
10/15/2020	Rachel Steyer	0.5	\$750	\$375	updating sharepoint tracking corresponding to new ESI searches	Class Outreach and Contact
10/15/2020	Rachel Steyer	0.2	\$750	\$150	email to TRB requesting/question re targeting vision class members	Class Outreach and Contact
10/15/2020	Rachel Steyer	1.0	\$750	\$750	reviewing declarations for specific mobility &/or vision issues, upating sharepoint	Class Outreach and Contact
10/15/2020	Rachel Steyer	0.5	\$750	\$375	editing/revising intake outreach script to reflect additions to ADA section	Class Outreach and Contact
10/15/2020	Rachel Steyer	0.2	\$750	\$150	email to KAJ, TSJ, KDL, CMBM w/updated outreach script	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/15/2020	Rachel Steyer	0.2	\$750	\$150	reviewing TSJ privilege log, writing email to her concerning additions needed	Discovery (Non-Deposition)
10/15/2020	Rachel Steyer	0.6	\$750	\$450	updating residency agreement spreadsheet	Discovery (Non-Deposition)
10/15/2020	Rachel Steyer	0.2	\$750	\$150	additional updates to residency agreement spreadsheet	Discovery (Non-Deposition)
10/15/2020	Rachel Steyer	0.2	\$750	\$150	reviewing additional docs pulled for named declarants	Discovery (Non-Deposition)
10/15/2020	Rachel Steyer	0.3	\$750	\$225	reviewing documents in Relativity; asking F/U question to RAB & JMP	Discovery (Non-Deposition)
10/15/2020	Travis Close	1.0	\$850	\$850	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1186742-BKD1187481 (254-275 of 1271)	Discovery (Non-Deposition)
10/15/2020	Travis Close	1.1	\$850	\$935	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1187481-BKD1188168 (275-298 of 1271)	Discovery (Non-Deposition)
10/15/2020	Travis Close	0.9	\$850	\$765	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1188168-BKD1188908 (298-320 of 1271)	Discovery (Non-Deposition)
10/15/2020	Travis Close	0.8	\$850	\$680	Modify physical access delcaration template with barrier language found from prior class declarations	Pleadings and Motions Re: Pleadings
10/15/2020	Travis Close	1.3	\$850	\$1,105	Research evidence sufficient to create a triable issue of fact on where P has a disability under ADA (Ninth Circuit)	Pleadings and Motions Re: Pleadings
10/15/2020	Travis Close	1.2	\$850	\$1,020	Research how much evidence is required to prove disability where other evidence already exists	Pleadings and Motions Re: Pleadings
10/16/2020	Guy Wallace	0.8	\$1,350	\$1,080	com's with GG; MTJ re D's proposed re class certification schedule; review and analysis of same	Class Certification
10/16/2020	Rachel Steyer	0.5	\$750	\$375	reviewing KDL draft declaration	Class Certification
10/16/2020	Rachel Steyer	0.4	\$750	\$300	received call back from class member, scheduled intake call	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/16/2020	Rachel Steyer	0.2	\$750	\$150	email to KAJ, TSJ, KDL, CMBM, TRB re declaration drafting	Class Outreach and Contact
10/16/2020	Rachel Steyer	5.4	\$750	\$4,050	legal research re vision and ADA	Discovery (Non-Deposition)
10/16/2020	Travis Close	0.3	\$850	\$255	Analyze DSS report on COVID-19 deaths at individual facilities/statewide	Case Organization, Planning and Strategy
10/16/2020	Travis Close	0.4	\$850	\$340	Analyze directives from DSS re: inspection of elder care facilities during COVID-19	Case Organization, Planning and Strategy
10/16/2020	Travis Close	0.3	\$850	\$255	Review/analyze D's counter proposal re: stip for class certification	Discovery (Non-Deposition)
10/16/2020	Travis Close	1.2	\$850	\$1,020	Review meet & confer correspondance between parties on issue of producing IDs of residents w/ disabilities	Discovery (Non-Deposition)
10/16/2020	Travis Close	1.6	\$850	\$1,360	Revise joint letter brief re: identification of residents with disabilities	Discovery (Non-Deposition)
10/16/2020	Travis Close	0.6	\$850	\$510	Analyze Def's prior M/C correspondance for info re: positions on ID'ing residents with disabilities	Discovery (Non-Deposition)
10/16/2020	Travis Close	1.0	\$850	\$850	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1188908-BKD1190269 (320-349 of 1271)	Discovery (Non-Deposition)
10/16/2020	Travis Close	1.0	\$850	\$850	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1190269-BKD1190953 (349-370 of 1271)	Discovery (Non-Deposition)
10/16/2020	Travis Close	1.0	\$850	\$850	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1190953-BKD1191747 (370-393 of 1271)	Discovery (Non-Deposition)
10/16/2020	Travis Close	0.2	\$850	\$170	Analyze MTJ's edits to Ds counter proposal for class cert stip	Pleadings and Motions Re: Pleadings
10/19/2020	Guy Wallace	0.4	\$1,350	\$540	review and analysis of D's revised version of stipulation re class cert schedule; com's with GG; BU; MTJ re same	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/19/2020	Mark Johnson	0.3	\$1,150	\$345	email exchanges w/ OC re further proposed version of stipulation re class cert deadline, review same and coms w/ GBW re same	Class Certification
10/19/2020	Rachel Steyer	1.7	\$750	\$1,275	legal reserach/drafting memo re vision w/in ADA	Case Organization, Planning and Strategy
10/19/2020	Rachel Steyer	1.9	\$750	\$1,425	conducted intake w/class member, created client folder, updated sharepoint	Class Outreach and Contact
10/19/2020	Rachel Steyer	0.2	\$750	\$150	spoke w/class member, reviewed case, wanted to take a few days to think about things and speak to his brother	Class Outreach and Contact
10/19/2020	Rachel Steyer	3.0	\$750	\$2,250	redoing and working on privilege log	Discovery (Non-Deposition)
10/19/2020	Travis Close	0.2	\$850	\$170	Review/analyze final version of proposed stip to extend class cert deadline	Case Organization, Planning and Strategy
10/19/2020	Travis Close	1.4	\$850	\$1,190	Drafting & revisions on joint letter brief re: interrogatory no. 5 (residents with disabilities)	Discovery (Non-Deposition)
10/19/2020	Travis Close	1.4	\$850	\$1,190	Legal research on FRCP 33(d) Producing business records in lieu of responding to interrogatory	Discovery (Non-Deposition)
10/20/2020	Guy Wallace	0.3	\$1,350	\$405	review and analysis of order from J. Gilliam re CMC; com's with MTJ re same	Case Management Conferences
10/20/2020	Rachel Steyer	0.2	\$750	\$150	reviewing TCC draft mtc	Discovery (Non-Deposition)
10/20/2020	Rachel Steyer	6.4	\$750	\$4,800	working on privilege log	Discovery (Non-Deposition)
10/20/2020	Travis Close	0.3	\$850	\$255	Email to team re: updated verion of joint letter brief re: IDs of residents with disabilities	Case Organization, Planning and Strategy
10/20/2020	Travis Close	1.2	\$850	\$1,020	Analyse PSS questionnaires to determine metrics for vision impairment used	Case Organization, Planning and Strategy
10/20/2020	Travis Close	0.7	\$850	\$595	Analyze aggregate PSS data (csv file) provided by Brookdale to determine how blindness is measured	Case Organization, Planning and Strategy
10/20/2020	Travis Close	1.1	\$850	\$935	Research/investigate requirements for monitoring of residents with blindness in California	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/20/2020	Travis Close	0.6	\$850	\$510	Review meet & confer correspondance notes to track parties positions on issue of IDing residents with disabilities	Discovery (Non-Deposition)
10/20/2020	Travis Close	0.5	\$850	\$425	Begin drafting interrogatories for number of residents with blindness condiiton	Discovery (Non-Deposition)
10/20/2020	Travis Close	1.0	\$850	\$850	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1191747-BKD1192773 (393-417 of 1271)	Discovery (Non-Deposition)
10/20/2020	Travis Close	1.0	\$850	\$850	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1192773-BKD1193548 (417-443 of 1271)	Discovery (Non-Deposition)
10/20/2020	Travis Close	1.1	\$850	\$935	Final changes/revisions to draft of joint letter of IDs of residents with disabilities	Pleadings and Motions Re: Pleadings
10/21/2020	Rachel Steyer	0.5	\$750	\$375	organizing client emails/attachments in folder	Discovery (Non-Deposition)
10/21/2020	Rachel Steyer	6.5	\$750	\$4,875	work on privilege log	Discovery (Non-Deposition)
10/21/2020	Travis Close	1.4	\$850	\$1,190	Research obligations of parties to respond to interrogatories when invoking rule 33(d)	Case Organization, Planning and Strategy
10/21/2020	Travis Close	0.7	\$850	\$595	Research definition of blindness used in disability cases	Case Organization, Planning and Strategy
10/21/2020	Travis Close	0.9	\$850	\$765	Case research into extent of analysis required in responding to rule 33(d) invokes in lieu of answering interrogatories	Discovery (Non-Deposition)
10/21/2020	Travis Close	1.0	\$850	\$850	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1193548-BKD1194534 (443-470 of 1271)	Discovery (Non-Deposition)
10/21/2020	Travis Close	1.1	\$850	\$935	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1194534-BKD1195392 (470-497 of 1271)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/21/2020	Travis Close	0.9	\$850	\$765	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1195392-BKD1196221 (497-523 of 1271)	Discovery (Non-Deposition)
10/22/2020	Rachel Steyer	0.3	\$750	\$225	reviewing sharepoint outreach data	Class Outreach and Contact
10/22/2020	Rachel Steyer	3.2	\$750	\$2,400	privilege log	Discovery (Non-Deposition)
10/22/2020	Travis Close	0.2	\$850	\$170	Email from EPO summarizing findings in updated building records spreadsheet	Case Organization, Planning and Strategy
10/22/2020	Travis Close	0.7	\$850	\$595	Analyze updated Subpoena Production and Facility information spreadsheet shared by EPO for completeness & accuracy	Case Organization, Planning and Strategy
10/22/2020	Travis Close	0.9	\$850	\$765	Continue analyzing prior expert correspondance to determine dates of facility inspections	Case Organization, Planning and Strategy
10/22/2020	Travis Close	1.0	\$850	\$850	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1196221-BKD1200456 (523-546 of 1271)	Discovery (Non-Deposition)
10/22/2020	Travis Close	1.0	\$850	\$850	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1200456-BKD1201281 (546-570 of 1271)	Discovery (Non-Deposition)
10/22/2020	Travis Close	1.0	\$850	\$850	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1201281-BKD1202151 (570-594 of 1271)	Discovery (Non-Deposition)
10/23/2020	Rachel Steyer	7.2	\$750	\$5,400	vision and emergency evacuation reserach	Class Certification
10/23/2020	Travis Close	0.5	\$850	\$425	Research criteria for being nonambulatory (preadmission appraisal forms)	Case Organization, Planning and Strategy
10/23/2020	Travis Close	0.6	\$850	\$510	Analyze Brookdale's policies on how to prepare and maintain service plans	Case Organization, Planning and Strategy
10/23/2020	Travis Close	0.8	\$850	\$680	Analyze Brookdale's PSA questionnaire to determine data points helpful to class cert	Case Organization, Planning and Strategy
10/23/2020	Travis Close	0.7	\$850	\$595	Analyze data ponts/criteria used by Brookdale to determine mobility status	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/23/2020	Travis Close	0.4	\$850	\$340	Research definition of blindness in California disability discrimination statutes.	Case Organization, Planning and Strategy
10/23/2020	Travis Close	1.3	\$850	\$1,105	Continue drafting 3rd set of ROGs and accompanying definitions	Discovery (Non-Deposition)
10/23/2020	Travis Close	1.1	\$850	\$935	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1202151-BKD1203031 (594-619 of 1271)	Discovery (Non-Deposition)
10/23/2020	Travis Close	1.0	\$850	\$850	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1203031-BKD1204156 (619-644 of 1271)	Discovery (Non-Deposition)
10/26/2020	Guy Wallace	0.4	\$1,350	\$540	review and analysis of proposed stipulation and order re schedule on class certification	Class Certification
10/26/2020	Guy Wallace	0.7	\$1,350	\$945	com's with GG; MTJ re schedule on class certification and preparation for CMC with J. Gilliam re same	Class Certification
10/26/2020	Mark Johnson	0.6	\$1,150	\$690	call w/ GBW and GCG re strategy and anticipated issues for call with court re extension of class cert deadline	Case Management Conferences
10/26/2020	Rachel Steyer	0.2	\$750	\$150	reviewing status of updated vision info input in sharepoint	Class Outreach and Contact
10/26/2020	Rachel Steyer	0.3	\$750	\$225	reviewing TCC draft interrogatories	Discovery (Non-Deposition)
10/26/2020	Rachel Steyer	0.2	\$750	\$150	review TCC draft mtc	Discovery (Non-Deposition)
10/26/2020	Rachel Steyer	6.1	\$750	\$4,575	finalizing work re privilege log	Discovery (Non-Deposition)
10/26/2020	Travis Close	1.2	\$850	\$1,020	Legal research re: data analysis examples in cases under FRCP 3(d)	Case Organization, Planning and Strategy
10/26/2020	Travis Close	1.2	\$850	\$1,020	Research ROGs from prior disability cases for additional ideas in current set ROGs	Depositions
10/26/2020	Travis Close	1.4	\$850	\$1,190	Draft & revise Helen Carlson interrogatories, set one	Discovery (Non-Deposition)
10/26/2020	Travis Close	0.4	\$850	\$340	Review correspondence re: production of PSS data for joint letter brief additions	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/26/2020	Travis Close	1.0	\$850	\$850	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1204156-BKD1204425 (644-648 of 1271)	Discovery (Non-Deposition)
10/26/2020	Travis Close	1.0	\$850	\$850	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1204425-BKD1205196 (648-673 of 1271)	Discovery (Non-Deposition)
10/27/2020	Guy Wallace	1.1	\$1,350	\$1,485	preparation for CMC with J. Gilliam re schedule and state of discovery; com's with MTJ re same (.3)	Case Management Conferences
10/27/2020	Guy Wallace	0.8	\$1,350	\$1,080	telephonic CMC with J. Gilliam; Maatman; Riley; GG; MTJ	Case Management Conferences
10/27/2020	Guy Wallace	0.3	\$1,350	\$405	com's with GG; MTJ re results of CMC with J. Gilliam	Case Management Conferences
10/27/2020	Mark Johnson	0.9	\$1,150	\$1,035	telephonic CMC re requested extension to file class cert brief.	Case Management Conferences
10/27/2020	Mark Johnson	0.3	\$1,150	\$345	reiew discovery stats from RAB, stip and prior reports to court for CMC re requested extension of time to file class cert brief	Case Management Conferences
10/27/2020	Travis Close	0.8	\$850	\$680	CMC with judge Gilliam (teleconference)	Case Organization, Planning and Strategy
10/27/2020	Travis Close	0.4	\$850	\$340	Review update about plaintiff JA re: falls and burn at brookdale facility	Class Outreach and Contact
10/27/2020	Travis Close	1.0	\$850	\$850	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1205196-BKD1206681 (673-701 of 1271)	Discovery (Non-Deposition)
10/27/2020	Travis Close	1.0	\$850	\$850	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1206681-BKD1207444 (701-722 of 1271)	Discovery (Non-Deposition)
10/28/2020	Guy Wallace	0.5	\$1,350	\$675	review and analysis of D's letter re ESI production and com's with MTJ re same	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/28/2020	Mark Johnson	0.5	\$1,150	\$575	coms w/ GBW and Gay G before and after CMC re strategy and follow-up	Case Management Conferences
10/28/2020	Rachel Steyer	0.2	\$750	\$150	email to CBM re class member	Class Outreach and Contact
10/28/2020	Rachel Steyer	0.2	\$750	\$150	email to Brookdale outreach team re vision outreach	Class Outreach and Contact
10/28/2020	Travis Close	1.0	\$850	\$850	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1207444-BKD1208277 (722-747 of 1271)	Discovery (Non-Deposition)
10/28/2020	Travis Close	1.0	\$850	\$850	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1208277-BKD1209136 (747-771 of 1271)	Discovery (Non-Deposition)
10/28/2020	Travis Close	1.1	\$850	\$935	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1209136-BKD1210249 (771-797 of 1271)	Discovery (Non-Deposition)
10/29/2020	Rachel Steyer	0.2	\$750	\$150	phone call with CBM re outreach question	Class Outreach and Contact
10/29/2020	Rachel Steyer	6.5	\$750	\$4,875	ADA vision research	Misc. Research
10/29/2020	Travis Close	0.4	\$850	\$340	Review & analyze MTJ's letter from Oct 12 re: Proof of plaintiffs' disabilities and Ds' response from today	Case Organization, Planning and Strategy
11/2/2020	Guy Wallace	0.4	\$1,350	\$540	com's with Maatman; MTJ re meet and confer issues	Discovery (Non-Deposition)
11/2/2020	Travis Close	0.2	\$850	\$170	Email from co-counsel re: plaintiff injuries suffered and possible PI case	Case Organization, Planning and Strategy
11/2/2020	Travis Close	0.2	\$850	\$170	Email from opposing counsel re: request to meet and confer on discovery issues	Discovery (Non-Deposition)
11/2/2020	Travis Close	1.0	\$850	\$850	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1210249-BKD1211346 (797-824 of 1271)	Discovery (Non-Deposition)
11/4/2020	Guy Wallace	2.1	\$1,350	\$2,835	review and analysis of discovery issues, preparation for meet and confer with Maatman re same; com's with BU re same (.5)	Discovery (Non-Deposition)
11/4/2020	Rachel Steyer	6.0	\$750	\$4,500	evacuation research	Misc. Research

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/5/2020	Guy Wallace	2.3	\$1,350	\$3,105	review and analysis of correspondence in preparation for meet and confer with Maatman; Riley	Discovery (Non-Deposition)
11/5/2020	Guy Wallace	0.5	\$1,350	\$675	com's with BU re meet and confer with Maatman; Riley	Discovery (Non-Deposition)
11/5/2020	Travis Close	0.3	\$850	\$255	Analyze purported release signed by class members (Penneys)	Case Organization, Planning and Strategy
11/5/2020	Travis Close	1.3	\$850	\$1,105	Legal research on effect or strength of individual release forms in class actions	Case Organization, Planning and Strategy
11/5/2020	Travis Close	0.2	\$850	\$170	Email to RLS re: validity of purported release signed by class members	Class Outreach and Contact
11/6/2020	Travis Close	0.3	\$850	\$255	check subpoenas for accuracy & sign	Case / Document Administration
11/6/2020	Travis Close	0.9	\$850	\$765	Prepare notice of subpoenas & exhibits	Case Organization, Planning and Strategy
11/6/2020	Travis Close	0.2	\$850	\$170	Email to GBW re: responding to Def's requests in yesterday's M/C call	Case Organization, Planning and Strategy
11/6/2020	Travis Close	0.2	\$850	\$170	Review and analyze Def's letter re: yesterday's M/C call	Case Organization, Planning and Strategy
11/6/2020	Travis Close	0.3	\$850	\$255	Email to Titan Legal re: two additional subpoenas to be served	Case Organization, Planning and Strategy
11/6/2020	Travis Close	1.3	\$850	\$1,105	Draft subpoena for san diego department of developmental services	Discovery (Non-Deposition)
11/6/2020	Travis Close	0.5	\$850	\$425	Prepare POS to notice of issuance of subpoenas and send to Defendants	Discovery (Non-Deposition)
11/6/2020	Travis Close	1.0	\$850	\$850	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1211346-BKD1212499 (824-851 of 1271)	Discovery (Non-Deposition)
11/6/2020	Travis Close	1.0	\$850	\$850	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1212499-BKD1213766 (851-877 of 1271)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/6/2020	Travis Close	1.1	\$850	\$935	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1213766-BKD1214578 (877-899 of 1271)	Discovery (Non-Deposition)
11/9/2020	Rachel Steyer	0.5	\$750	\$375	received call back from class member, answered questions about case, determined not good fit for intake/dec	Class Outreach and Contact
11/9/2020	Rachel Steyer	0.3	\$750	\$225	received call back from class member, wanted to speak w/mother first before proceeding further	Class Outreach and Contact
11/9/2020	Rachel Steyer	5.3	\$750	\$3,975	emergency evac ADA research	Misc. Research
11/9/2020	Travis Close	1.2	\$850	\$1,020	Review prior correspondance re: search terms Ps/Ds proposed	Case Organization, Planning and Strategy
11/9/2020	Travis Close	1.4	\$850	\$1,190	Analyze Ps proposed search terms to match with RFPs for M/C (D's request) (Set 1 RFP)	Discovery (Non-Deposition)
11/9/2020	Travis Close	1.4	\$850	\$1,190	Analyze Ps proposed search terms to match with RFPs for M/C	Discovery (Non-Deposition)
11/9/2020	Travis Close	1.0	\$850	\$850	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1214578-BKD1215386 (899-926 of 1271)	Discovery (Non-Deposition)
11/9/2020	Travis Close	1.0	\$850	\$850	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1215386-BKD1216072 (926-951 of 1271)	Discovery (Non-Deposition)
11/10/2020	Guy Wallace	0.5	\$1,350	\$675	review and analysis of BU notes re 11/5/20 meet and confer with D's re various discovery issues requiring supplementation, com's with GG; BBK; JY; AX; BU; MTJ; TCC re same	Discovery (Non-Deposition)
11/10/2020	Travis Close	0.3	\$850	\$255	Analye email by GBW re: response to Def's doc requests & M/C strategy	Case Organization, Planning and Strategy
11/10/2020	Travis Close	1.4	\$850	\$1,190	Analyze proposed search terms & match with corresponding RFPs (Ps RFPs, Set Two)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/10/2020	Travis Close	1.2	\$850	\$1,020	Analyze proposed search terms & match with corresponding RFPs (Ps RFPs, Set Three)	Discovery (Non-Deposition)
11/10/2020	Travis Close	1.0	\$850	\$850	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1216072-BKD1217443 (951-978 of 1271)	Discovery (Non-Deposition)
11/10/2020	Travis Close	1.0	\$850	\$850	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1217443-BKD1222639 (978-1004 of 1271)	Discovery (Non-Deposition)
11/10/2020	Travis Close	1.0	\$850	\$850	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1222639-BKD1293796 (1004-1031 of 1271)	Discovery (Non-Deposition)
11/11/2020	Guy Wallace	0.7	\$1,350	\$945	analysis of drafts of P's privilege log re communications with putative class members and documents; com's with BU re same	Discovery (Non-Deposition)
11/11/2020	Travis Close	1.2	\$850	\$1,020	Review Brookdale's Q3 10Q, in particular provisions related to the pandemic, financing, and ability to pay	Case Organization, Planning and Strategy
11/11/2020	Travis Close	1.3	\$850	\$1,105	Legal research re: cases discussing search terms and ESI in the ninth circuit	Case Organization, Planning and Strategy
11/11/2020	Travis Close	0.4	\$850	\$340	Review/analyze Q3 press release for virus impacts and cost reductions	Discovery (Non-Deposition)
11/11/2020	Travis Close	0.4	\$850	\$340	Review/analyze Q3 investor presentation for liquidity, ability to pay data, and virus impacts	Discovery (Non-Deposition)
11/11/2020	Travis Close	1.0	\$850	\$850	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1293796-BKD1294699 (1031-1062 of 1271)	Discovery (Non-Deposition)
11/11/2020	Travis Close	1.0	\$850	\$850	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1294699-BKD1294995 (1062-1088 of 1271)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/11/2020	Travis Close	1.1	\$850	\$935	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1294995-BKD1295345 (1088-1123 of 1271)	Discovery (Non-Deposition)
11/12/2020	Guy Wallace	0.3	\$1,350	\$405	com's with Maatman re discovery issues and D's demands for supplementation	Communications With Opposing Counsel
11/12/2020	Guy Wallace	0.7	\$1,350	\$945	com's with GG; BBK; JY; AX; BU; MTJ; TCC; RLS re D's requests for supplemental responses re Interrogatories and RFPs	Discovery (Non-Deposition)
11/12/2020	Guy Wallace	0.4	\$1,350	\$540	com's with BU re supplemental responses to D's pursuant to 11/5/20 meet and confer	Discovery (Non-Deposition)
11/12/2020	Rachel Steyer	5.8	\$750	\$4,350	emergency evaucation research	Class Certification
11/12/2020	Rachel Steyer	0.2	\$750	\$150	reviewing communications from class members w/CBM	Discovery (Non-Deposition)
11/12/2020	Rachel Steyer	0.6	\$750	\$450	confernece with GBW, RBBG re meet and confer	Discovery (Non-Deposition)
11/12/2020	Rachel Steyer	0.2	\$750	\$150	reviewing email from co-counsel with prior privilege log	Discovery (Non-Deposition)
11/12/2020	Travis Close	1.2	\$850	\$1,020	Analyze docs on service alignment system for relevant search terms/RFPs	Case Organization, Planning and Strategy
11/12/2020	Travis Close	1.4	\$850	\$1,190	Analyze docs produced on PEAR system to determine which RFPs match search terms	Case Organization, Planning and Strategy
11/12/2020	Travis Close	0.7	\$850	\$595	Meeting with GBW, AX, BMY, JY re: responding to Ds' discovery requests	Case Organization, Planning and Strategy
11/12/2020	Travis Close	0.2	\$850	\$170	Email to RAB re: preparing a privilege log	Case Organization, Planning and Strategy
11/12/2020	Travis Close	0.9	\$850	\$765	Continue analyzing proposed search terms & matching to relevant RFPs	Discovery (Non-Deposition)
11/12/2020	Travis Close	0.5	\$850	\$425	Prepare for team meeting re: responding to Ds M/C request for further responses	Discovery (Non-Deposition)
11/12/2020	Travis Close	0.4	\$850	\$340	Review prior correspondance re: privilege logs and doc withholdings from Ps first production	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/12/2020	Travis Close	1.0	\$850	\$850	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1295345-BKD1295485 (1123-1147 of 1271)	Discovery (Non-Deposition)
11/12/2020	Travis Close	1.0	\$850	\$850	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1295485-BKD1295712 (1147-1172 of 1271)	Discovery (Non-Deposition)
11/13/2020	Mark Johnson	1.0	\$1,150	\$1,150	drive to Danville for mtg and document exchange w/ client rep Rita Stiner	Discovery (Non-Deposition)
11/13/2020	Mark Johnson	0.5	\$1,150	\$575	mtg and document exchange w/ client rep Rita Stiner.	Discovery (Non-Deposition)
11/13/2020	Rachel Steyer	0.2	\$750	\$150	reviewing communications with class member and cocounsel	Discovery (Non-Deposition)
11/13/2020	Travis Close	0.4	\$850	\$340	Call with MTJ re: strategy for responding to discovery reqs	Case Organization, Planning and Strategy
11/13/2020	Travis Close	1.5	\$850	\$1,275	Legal research on how to setup privilege logs	Case Organization, Planning and Strategy
11/13/2020	Travis Close	1.2	\$850	\$1,020	Legal research re: supplementing answers as to proof of disability status	Discovery (Non-Deposition)
11/13/2020	Travis Close	0.7	\$850	\$595	Finalize search terms analysis / matching with Ps RFPs	Discovery (Non-Deposition)
11/13/2020	Travis Close	1.0	\$850	\$850	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1295712-BKD1297795 (1172-1204 of 1271)	Discovery (Non-Deposition)
11/13/2020	Travis Close	1.0	\$850	\$850	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1297795-BKD1299492 (1204-1239 of 1271)	Discovery (Non-Deposition)
11/13/2020	Travis Close	1.0	\$850	\$850	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1299492-BKD1299786 (1204-1239 of 1271)	Discovery (Non-Deposition)
11/15/2020	Mark Johnson	0.6	\$1,150	\$690	call w/ client rep Rita Stiner re billing issues and communication w/ new San Ramon director	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/15/2020	Mark Johnson	0.5	\$1,150	\$575	review and analyze recent billing-related documents from R. Stiner for call re same	Discovery (Non-Deposition)
11/16/2020	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of letter from Maatman of 11/5 re D's requested supplementation; P's responses to D's discovery; com's with TCC and RLS re same	Discovery (Non-Deposition)
11/16/2020	Guy Wallace	0.6	\$1,350	\$810	com's with BBK; JY; AX; MTJ; TCC; RLS re preparation of supplemental responses	Discovery (Non-Deposition)
11/16/2020	Guy Wallace	0.3	\$1,350	\$405	com's with Waters re further responses to D's discovery	Discovery (Non-Deposition)
11/16/2020	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re class cert strategy (sampling for staffing analysis), supplementation of discovery, ESI search term response	Case Organization, Planning and Strategy
11/16/2020	Mark Johnson	0.7	\$1,150	\$805	team call w/ GBW, TCC, Rachel Steyer, Ben BK, Jenny Y, Amy re supplementing discovery responses, ESI letter and responses to other demands in M&C ltr from OC	Case Organization, Planning and Strategy
11/16/2020	Mark Johnson	0.4	\$1,150	\$460	call x2 w/ gbw re supplemental discovery responses, potential outreach to former employees, ESI counterproposal	Discovery (Non-Deposition)
11/16/2020	Mark Johnson	0.8	\$1,150	\$920	call w/ Sharon Eidler re case status, S. Stiner's circumstances and history, San Ramon facility, Shaun Cull	Discovery (Non-Deposition)
11/16/2020	Mark Johnson	1.7	\$1,150	\$1,955	review of document productions from Ds and document production cover emails; email to RAB re same and projects to be undertaken.	Discovery (Non-Deposition)
11/16/2020	Rachel Steyer	0.4	\$750	\$300	F/U call w/class member	Class Outreach and Contact
11/16/2020	Rachel Steyer	0.6	\$750	\$450	call with GBW to discuss privilege log	Discovery (Non-Deposition)
11/16/2020	Rachel Steyer	0.7	\$750	\$525	call w/GBW, TCC, MTJ + cocounsel re outstanding discovery issues	Discovery (Non-Deposition)
11/16/2020	Rachel Steyer	0.3	\$750	\$225	email to co-counsel w/question re privilege log	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/16/2020	Rachel Steyer	0.2	\$750	\$150	email to co-counsel re privilege logs	Discovery (Non-Deposition)
11/16/2020	Rachel Steyer	4.6	\$750	\$3,450	combining and updating privilege logs	Discovery (Non-Deposition)
11/16/2020	Travis Close	0.2	\$850	\$170	Email to RAB re: status of privilege log production	Case Organization, Planning and Strategy
11/16/2020	Travis Close	0.3	\$850	\$255	Email to GBW and MTJ re: responding to Ds request for search term targeted RFPs	Discovery (Non-Deposition)
11/16/2020	Travis Close	0.8	\$850	\$680	Call with team re: strategy for responding to Ds RFP/ROG requests	Discovery (Non-Deposition)
11/16/2020	Travis Close	1.1	\$850	\$935	Email to BMU, MTJ re: analysis of Ds proposed custodians and counterproposals	Discovery (Non-Deposition)
11/17/2020	Rachel Steyer	6.0	\$750	\$4,500	preparing and revising privilege log	Discovery (Non-Deposition)
11/17/2020	Rachel Steyer	0.4	\$750	\$300	reviewing co-counsel memo circulated re class member communications and privilege	Misc. Research
11/17/2020	Travis Close	0.2	\$850	\$170	Email to MTJ re: stip with city of brentwood re building records production	Case Organization, Planning and Strategy
11/17/2020	Travis Close	1.3	\$850	\$1,105	Analysis of draft privilege log shared by RAB	Case Organization, Planning and Strategy
11/17/2020	Travis Close	0.4	\$850	\$340	Email to team re: next steps for privilege log	Case Organization, Planning and Strategy
11/17/2020	Travis Close	1.0	\$850	\$850	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1299786-BKD1230192 (1239-1256 of 1271)	Discovery (Non-Deposition)
11/17/2020	Travis Close	1.1	\$850	\$935	Analysis/review - ingress, egress, fire doors, emergency exit barriers-- # BKD1230192-BKD1230573 (1256-1271 of 1271)	Discovery (Non-Deposition)
11/18/2020	Guy Wallace	0.2	\$1,350	\$270	com's with MTJ re Stiner and discovery responses	Discovery (Non-Deposition)
11/18/2020	Mark Johnson	0.3	\$1,150	\$345	review and analyze email description of plan for supplementing responses to doc requests and interrogatories. respond re same	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/18/2020	Travis Close	0.9	\$850	\$765	Plan/organize privilege log for Ps' first production	Case Organization, Planning and Strategy
11/18/2020	Travis Close	0.4	\$850	\$340	Email to RAB, EPO re: assignment to produce building records to defendants	Discovery (Non-Deposition)
11/18/2020	Travis Close	1.4	\$850	\$1,190	Legal research re; components of privilege logs	Discovery (Non-Deposition)
11/18/2020	Travis Close	0.8	\$850	\$680	Analyze scope of third party production of building records to plan how to produce to Defendants	Discovery (Non-Deposition)
11/18/2020	Travis Close	1.2	\$850	\$1,020	research what constitutes an adequate privilege log under rule 26(b)(5)	Discovery (Non-Deposition)
11/18/2020	Travis Close	0.9	\$850	\$765	Privilege log creation -- # CTRL0000003-CTRL0000014 (1-14 of 249)	Discovery (Non-Deposition)
11/19/2020	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ re meet and confer with D's re ESI discovery	Discovery (Non-Deposition)
11/19/2020	Travis Close	1.2	\$850	\$1,020	Privilege log creation -- # CTRL0000014-CTRL0000076 (5-13 of 249)	Discovery (Non-Deposition)
11/19/2020	Travis Close	1.4	\$850	\$1,190	Privilege log creation -- # CTRL0000076-CTRL0000150 (13-25 of 249)	Discovery (Non-Deposition)
11/19/2020	Travis Close	1.1	\$850	\$935	Privilege log creation -- # CTRL0000150-CTRL0000300 (25-36 of 249)	Discovery (Non-Deposition)
11/19/2020	Travis Close	1.2	\$850	\$1,020	Privilege log creation -- # CTRL0000300-CTRL0000417.0001 (36-48 of 249)	Discovery (Non-Deposition)
11/20/2020	Guy Wallace	0.5	\$1,350	\$675	revise and edit draft letter from MTJ to Maatman re ESI discovery	Discovery (Non-Deposition)
11/20/2020	Guy Wallace	0.7	\$1,350	\$945	com's with Waters; Mastin re preparation of draft expert reports and P's supplemental responses to D's interrogatories re access barriers	Discovery (Non-Deposition)
11/20/2020	Guy Wallace	1.1	\$1,350	\$1,485	preparation and drafting of letter to D's re supplemental interrogatory responses; revise and edit same	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/20/2020	Guy Wallace	0.6	\$1,350	\$810	review and analysis of revised draft of MTJ letter to Maatman re ESI; com's with MTJ re same and custodians and search terms	Discovery (Non-Deposition)
11/20/2020	Mark Johnson	0.2	\$1,150	\$230	call w/ client's mother re status, developments with client	Case Organization, Planning and Strategy
11/20/2020	Mark Johnson	0.5	\$1,150	\$575	call (.3) and emails (.3) w/ TCC re work on search terms; ltr to opposing counsel re same	Discovery (Non-Deposition)
11/20/2020	Mark Johnson	6.5	\$1,150	\$7,475	revise ltr to OC GLM re search terms, custodian; revise search terms and review doc requests for reference and connection to search terms.	Discovery (Non-Deposition)
11/20/2020	Mark Johnson	0.3	\$1,150	\$345	calls w/ GBW re search terms and letter re same	Discovery (Non-Deposition)
11/20/2020	Rachel Steyer	0.2	\$750	\$150	reviewing letter prepared by MTJ re disc to opposing counsel	Discovery (Non-Deposition)
11/20/2020	Rachel Steyer	6.6	\$750	\$4,950	work on privilege logs	Discovery (Non-Deposition)
11/20/2020	Travis Close	1.3	\$850	\$1,105	Edits to draft letter by MTJ re: ESI and search terms	Case Organization, Planning and Strategy
11/20/2020	Travis Close	0.6	\$850	\$510	Analyze docs related to PEAR system for ESI letter	Case Organization, Planning and Strategy
11/20/2020	Travis Close	0.3	\$850	\$255	Review/analyze draft M/C letter by MTJ re: ESI negotiations	Discovery (Non-Deposition)
11/20/2020	Travis Close	0.3	\$850	\$255	Call with MTJ re: assistance with ESI M/C letter with defendants	Discovery (Non-Deposition)
11/20/2020	Travis Close	0.3	\$850	\$255	Review draft search terms & RFP connectors	Discovery (Non-Deposition)
11/20/2020	Travis Close	0.3	\$850	\$255	Edits/corrections to draft search terms for ESI	Discovery (Non-Deposition)
11/20/2020	Travis Close	0.3	\$850	\$255	Draft exhibit A with revised proposed custodians to M/C letter	Discovery (Non-Deposition)
11/23/2020	Guy Wallace	0.7	\$1,350	\$945	preparation of further task list re discovery and motions to compel	Case Organization, Planning and Strategy
11/23/2020	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re task planning, setting mtg of litigation team	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/23/2020	Mark Johnson	2.0	\$1,150	\$2,300	work on mtg agenda and task list; coms w/ COC re scheduling mtg	Case Organization, Planning and Strategy
11/23/2020	Travis Close	1.2	\$850	\$1,020	Privilege log review & analysis -- # CTRL0000419-CTRL0000436 (49-59 of 249)	Discovery (Non-Deposition)
11/23/2020	Travis Close	1.3	\$850	\$1,105	Privilege log review & analysis -- # CTRL0000436-CTRL0000517 (59-71 of 249)	Discovery (Non-Deposition)
11/23/2020	Travis Close	1.2	\$850	\$1,020	Privilege log review & analysis -- # CTRL0000517-CTRL0000534 (71-81 of 249)	Discovery (Non-Deposition)
11/24/2020	Rachel Steyer	0.2	\$750	\$150	answered class member's questions about case update	Class Outreach and Contact
11/24/2020	Travis Close	1.2	\$850	\$1,020	Privilege log creation & analysis -- # CTRL0000534-CTRL0000534.0015 (82-97 of 249)	Discovery (Non-Deposition)
11/24/2020	Travis Close	1.2	\$850	\$1,020	Privilege log creation & analysis -- # CTRL0000534.0015-CTRL0000628 (97-108 of 249)	Discovery (Non-Deposition)
11/24/2020	Travis Close	1.3	\$850	\$1,105	Privilege log creation & analysis -- # CTRL0000628-CTRL0000789 (108-120 of 249)	Discovery (Non-Deposition)
11/24/2020	Travis Close	1.2	\$850	\$1,020	Privilege log creation & analysis -- # CTRL0000789-CTRL0000865 (120-190 of 249)	Discovery (Non-Deposition)
11/25/2020	Mark Johnson	0.3	\$1,150	\$345	email exchanges w/ COC Amy Xu re San Ramon coronavirus situation and client stacy stiner	Case Organization, Planning and Strategy
11/25/2020	Mark Johnson	0.3	\$1,150	\$345	review spreadsheet and other compilations from EO re facility construction and inspection history and responses to subpoenas.	Case Organization, Planning and Strategy
11/25/2020	Mark Johnson	0.1	\$1,150	\$115	com w/ Rita Stiner re status of San Ramon Brookdale coronavirus measures and Stacy's situation	Class Certification
11/25/2020	Mark Johnson	0.2	\$1,150	\$230	review and respond to email from Amy Xu re format of supplemental responses to rogs and rfps; email re meeting times.	Discovery (Non-Deposition)
11/25/2020	Mark Johnson	0.2	\$1,150	\$230	review medical records rec'd from R Stiner for Stacy and supplemental response do document production.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/25/2020	Mark Johnson	0.7	\$1,150	\$805	participate in Zoom call w/ Brookdale staff re coronavirus situation on behalf of Rita Stiner	Misc. Research
11/25/2020	Mark Johnson	0.3	\$1,150	\$345	review new 9th circuit case law on UCL/CLRA standing (Singh)	Misc. Research
11/25/2020	Rachel Steyer	2.9	\$750	\$2,175	intake call w/class member, creating client folder, updated sharepoint	Class Outreach and Contact
11/25/2020	Rachel Steyer	0.4	\$750	\$300	reviewed co-counsel's memo re communications with class representative	Class Outreach and Contact
11/25/2020	Rachel Steyer	3.6	\$750	\$2,700	work on privilege log	Discovery (Non-Deposition)
11/25/2020	Travis Close	0.2	\$850	\$170	Emails from MTJ and AX re: plaintiff stacia stiner becoming sick	Case Organization, Planning and Strategy
11/25/2020	Travis Close	0.8	\$850	\$680	Legal research re: whether Ps' counsel names are required to be disclosed in privilege logs	Discovery (Non-Deposition)
11/25/2020	Travis Close	1.3	\$850	\$1,105	Privilege log completion -- # Privilege log creation & analysis -- # CTRL0000789-CTRL0000865 (190-200 of 249)	Discovery (Non-Deposition)
11/25/2020	Travis Close	1.2	\$850	\$1,020	Privilege log completion -- # Privilege log creation & analysis -- # CTRL0000865-CTRL0001165 (200-214 of 249)	Discovery (Non-Deposition)
11/30/2020	Guy Wallace	1.8	\$1,350	\$2,430	legal research and analysis re recent case law re variation in implementation or application of corporate policies and procedures does not defeat commonality or predominance	Class Certification
11/30/2020	Guy Wallace	1.9	\$1,350	\$2,565	review and analysis of MTJ agenda re team meeting re class cert preparation; revise and edit same	Class Certification
11/30/2020	Mark Johnson	0.3	\$1,150	\$345	call w/ client re recent developments, difficulties in getting care after move to isolation for covid positive residents	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/30/2020	Mark Johnson	0.3	\$1,150	\$345	review TCC draft of privilege log and proposed interrogatories.	Discovery (Non-Deposition)
11/30/2020	Mark Johnson	4.7	\$1,150	\$5,405	review document production and spreadsheets of PSP and timekeeping data; draft emails to experts and co-counsel describing and uploading same	Discovery (Non-Deposition)
11/30/2020	Travis Close	0.3	\$850	\$255	Analyze draft agenda before team call tomorrow	Case Organization, Planning and Strategy
11/30/2020	Travis Close	0.4	\$850	\$340	Review EPO's updated analysis of docs received from third parties re: facilities inspected/not inspected	Case Organization, Planning and Strategy
11/30/2020	Travis Close	0.6	\$850	\$510	Update inspection figures table with recently divested facilities	Case Organization, Planning and Strategy
11/30/2020	Travis Close	0.5	\$850	\$425	Review updated guidance on coronavirus disease promulgated by Cal DSS for adult residential & elderly care facilities	Case Organization, Planning and Strategy
11/30/2020	Travis Close	0.2	\$850	\$170	Email to MTJ, GBW, RLS re: draft priv log for plaintiff doc production	Case Organization, Planning and Strategy
11/30/2020	Travis Close	0.2	\$850	\$170	Review GBW's edits to agenda for tomorrow's team meeting	Case Organization, Planning and Strategy
11/30/2020	Travis Close	1.1	\$850	\$935	Privilege log review & completion -- # CTRL0001165-CTRL0001185 (214-225 of 249)	Discovery (Non-Deposition)
11/30/2020	Travis Close	1.3	\$850	\$1,105	Privilege log review & completion -- # CTRL0001185-CTRL0001339 (225-237 of 249)	Discovery (Non-Deposition)
11/30/2020	Travis Close	0.3	\$850	\$255	Review changes in latest draft of ROGs, set three before sending to MTJ	Discovery (Non-Deposition)
11/30/2020	Travis Close	1.2	\$850	\$1,020	Privilege log review & completion -- # CTRL0001339-CTRL0001354 (237-249 of 249)	Discovery (Non-Deposition)
12/1/2020	Guy Wallace	3.4	\$1,350	\$4,590	preparation and drafting of memo re key facts to establish for moving papers on class certification	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/1/2020	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ re preparation for meeting re class cert discovery and agenda re same	Class Certification
12/1/2020	Guy Wallace	1.2	\$1,350	\$1,620	com's with GG; BBK; JY; AX; BU; MTJ; TCC; RLS; RB; JP; EO re preparation for class certification, review and analysis of D's document production, ESI, P's supplemental responses to D's written discovery	Discovery (Non-Deposition)
12/1/2020	Mark Johnson	1.2	\$1,150	\$1,380	team videoconference meeting re status and task planning	Case Organization, Planning and Strategy
12/1/2020	Mark Johnson	0.9	\$1,150	\$1,035	call w/ GBW re agenda for team meeting, issues re residency agreemens, construction evidence, expert reports	Case Organization, Planning and Strategy
12/1/2020	Mark Johnson	0.4	\$1,150	\$460	follow up call w/ GBW re team mtg, task assignments, ESI status and strategy	Case Organization, Planning and Strategy
12/1/2020	Mark Johnson	0.6	\$1,150	\$690	call w/ TCC and RAB re document managment, residency agreement projects, construction related docs from different sources	Discovery (Non-Deposition)
12/1/2020	Mark Johnson	0.2	\$1,150	\$230	email exchanges (x3) w/ G Maatman re status of response to ESI proposal	Discovery (Non-Deposition)
12/1/2020	Mark Johnson	1.1	\$1,150	\$1,265	draft email to OC re recent timekeeping data production; researh prior correspondence and communications and data production for same	Discovery (Non-Deposition)
12/1/2020	Mark Johnson	3.8	\$1,150	\$4,370	review and analyze relativity document productions; draft email to RAB re issues w/ doc managment	Discovery (Non-Deposition)
12/1/2020	Rachel Steyer	1.2	\$750	\$900	meeting with Eidler team (MTJ, GBW, TCC, RAB, JP) and co-counsel to discuss planning for case, upcoming motions/filings	Case Organization, Planning and Strategy
12/1/2020	Rachel Steyer	1.1	\$750	\$825	revising declaration template	Class Certification
12/1/2020	Rachel Steyer	0.2	\$750	\$150	reviewing sharepoint outreach/declaration drafting info in preparation for status meeting	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/1/2020	Rachel Steyer	0.2	\$750	\$150	email to TRB re update on outreach	Class Outreach and Contact
12/1/2020	Rachel Steyer	3.9	\$750	\$2,925	privilege log	Discovery (Non-Deposition)
12/1/2020	Rachel Steyer	0.3	\$750	\$225	reviewing research forwarded by GBW	Misc. Research
12/1/2020	Travis Close	0.6	\$850	\$510	Call with MTJ, RAB re: doc review analysis before today's meeting	Case Organization, Planning and Strategy
12/1/2020	Travis Close	1.4	\$850	\$1,190	Prep for team meeting: analysis of deficient/incomplete responses from subpoenas issued to third parties	Case Organization, Planning and Strategy
12/1/2020	Travis Close	0.4	\$850	\$340	Analyze damages provision in Unruh act -- calculation of total damages; damages per violation	Case Organization, Planning and Strategy
12/1/2020	Travis Close	0.9	\$850	\$765	Analyze defendants' privilege log for sufficiency/deficiencies	Case Organization, Planning and Strategy
12/1/2020	Travis Close	1.1	\$850	\$935	Meeting with team (+ co-counsel) re: litigation plans for class certification; discovery; evidence needed; declarations, etc	Case Organization, Planning and Strategy
12/1/2020	Travis Close	0.2	\$850	\$170	Email to team re: sharing draft privilege log	Case Organization, Planning and Strategy
12/1/2020	Travis Close	0.9	\$850	\$765	Prep for team meeting: review/analysis of total residency agreements coded on Relativity	Discovery (Non-Deposition)
12/1/2020	Travis Close	1.4	\$850	\$1,190	Updates to draft privilege log per direction in today's team meeting	Discovery (Non-Deposition)
12/2/2020	Guy Wallace	3.6	\$1,350	\$4,860	preparation of memo re key facts to establish for class certification	Class Certification
12/2/2020	Guy Wallace	0.2	\$1,350	\$270	com's with MTJ re document review and analysis issues	Discovery (Non-Deposition)
12/2/2020	Mark Johnson	0.4	\$1,150	\$460	call w/ client re current conditions and developments, additional access issues for supplemental responses	Discovery (Non-Deposition)
12/2/2020	Mark Johnson	1.0	\$1,150	\$1,150	work on supplemental responses to Stiner interrogatories	Discovery (Non-Deposition)
12/2/2020	Travis Close	1.4	\$850	\$1,190	Updated analysis of recent DSS guidance re: allowed inspections at adult care facilities	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/2/2020	Travis Close	1.6	\$850	\$1,360	Further revisions and updates to privilege log	Case Organization, Planning and Strategy
12/3/2020	Guy Wallace	1.4	\$1,350	\$1,890	legal research and analysis re P's damages from access barriers under the Unruh Act	Discovery (Non-Deposition)
12/3/2020	Mark Johnson	0.5	\$1,150	\$575	begin working on supplemental responses to D's RPDs to Stiner	Discovery (Non-Deposition)
12/3/2020	Rachel Steyer	1.2	\$750	\$900	reviewing old voicemails from class member representatives, adding entries into privilege log, cross checking names in sharepoint to verify spelling	Discovery (Non-Deposition)
12/3/2020	Travis Close	0.2	\$850	\$170	Email to MTJ re: alleged privilege under HSC 19851	Case Organization, Planning and Strategy
12/3/2020	Travis Close	1.3	\$850	\$1,105	Analysis of cases addressing HSC 19851 and extend of owner's privilege in withholding building records	Case Organization, Planning and Strategy
12/3/2020	Travis Close	0.2	\$850	\$170	Email to BBK re: sharing staffing expert declarations with co-counsel	Experts (Including Retention)
12/4/2020	Guy Wallace	3.3	\$1,350	\$4,455	review and analysis of P's damages under the Unruh Act; legal research and analysis re same; com's with MTJ re same (.5)	Misc. Research
12/4/2020	Rachel Steyer	0.8	\$750	\$600	finalizing redacted version of privilege log	Discovery (Non-Deposition)
12/4/2020	Travis Close	0.2	\$850	\$170	Call with LEC re: filing stipulation would magistrate judge beeler	Case / Document Administration
12/4/2020	Travis Close	0.2	\$850	\$170	Review/analyze Ds letter re: ESI and search terms	Discovery (Non-Deposition)
12/4/2020	Travis Close	0.2	\$850	\$170	Review/analyze Ds proposed stip re: clawback of confidential ESI	Discovery (Non-Deposition)
12/5/2020	Guy Wallace	0.8	\$1,350	\$1,080	preparation of memo re key facts to establish for class certification	Class Certification
12/5/2020	Guy Wallace	1.3	\$1,350	\$1,755	legal research and analysis re P's damages claims under the Unruh Act; Section 55.56 and interpretation of particular occasion and minimum statutory damages	Misc. Research

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/5/2020	Mark Johnson	0.4	\$1,150	\$460	draft email memo to Justin P re memo on review of transportation docs, descibing content and focus of same	Discovery (Non-Deposition)
12/7/2020	Guy Wallace	0.8	\$1,350	\$1,080	com's with MTJ re discovery issues, including ESI production from Defendants and P's response thereto; document analysis of previously produced documents; named P's damages	Discovery (Non-Deposition)
12/7/2020	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of draft reports re access barriers at Fountaingrove facility; com's with Waters re same (.2)	Discovery (Non-Deposition)
12/7/2020	Guy Wallace	0.4	\$1,350	\$540	review and analysis of email from JMP re summary of D's transportation policies and attachments of same	Discovery (Non-Deposition)
12/7/2020	Guy Wallace	0.4	\$1,350	\$540	legal research and analysis re D's obligation to produce its ESI search terms of P's	Discovery (Non-Deposition)
12/7/2020	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of draft report from Waters re Fountaingrove facility	Experts (Including Retention)
12/7/2020	Mark Johnson	0.9	\$1,150	\$1,035	calls x3 w/ GBW re ESI, discovery planning, motions to compel, proposed response to Ds re ESI production, assessment of discovery status and work to be compelled for class cert mtn	Discovery (Non-Deposition)
12/7/2020	Mark Johnson	2.7	\$1,150	\$3,105	draft responsive letter to OC re ESI search proposal, timing re production, disclosure of search terms and proposed clawback agreement; research rules and case law re treatment of inadvertently produced documents and clawback agreements	Discovery (Non-Deposition)
12/7/2020	Rachel Steyer	1.7	\$750	\$1,275	drafting class member declaration	Class Certification
12/7/2020	Rachel Steyer	3.2	\$750	\$2,400	drafting class member declaration	Class Certification
12/7/2020	Rachel Steyer	2.0	\$750	\$1,500	drafting class member declaration	Class Certification
12/7/2020	Rachel Steyer	0.2	\$750	\$150	reviewing status of outreach/declaration drafting	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/7/2020	Travis Close	0.2	\$850	\$170	Email to GBW re: meeting tomorrow	Case Organization, Planning and Strategy
12/8/2020	Guy Wallace	0.8	\$1,350	\$1,080	revise and edit draft letter to Maatman & Priebe re D's failure to make a complete production of ESI by December 2020	Discovery (Non-Deposition)
12/8/2020	Guy Wallace	4.4	\$1,350	\$5,940	preparation of P's supplemental interrogatory response re individual damages of the named P's and encounters with barriers in Brookdale facilities; legal research and analysis re same; com's with Waters re same (.3)	Discovery (Non-Deposition)
12/8/2020	Guy Wallace	1.4	\$1,350	\$1,890	com's with AX; KS; BU; MTJ; TCC; RAB; JMP; EO re analysis of Residency Agreements, D's policy and procedure documents re accessibility; transportation; emergency evacuation; service alignment and staffing; auxiliary aids and services for residents with visual impairments	Discovery (Non-Deposition)
12/8/2020	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of Waters draft report re Fountaingrove facility and barriers identified therein	Experts (Including Retention)
12/8/2020	Mark Johnson	1.3	\$1,150	\$1,495	meeting of document review and analysis team to discuss status, projects and assignments	Case Organization, Planning and Strategy
12/8/2020	Mark Johnson	1.5	\$1,150	\$1,725	prep for doc review and analysis meeting, including review of Justin Proctor's memo summarizing results of analysis of transportation related documents, review other doc production memos and outline issues and potential assignments for meeting.	Discovery (Non-Deposition)
12/8/2020	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re results of doc review planning meeting and strategy going forward.	Discovery (Non-Deposition)
12/8/2020	Mark Johnson	0.3	\$1,150	\$345	incorporate edits from GBW, TCC and finalize ltr to OC re ESI production	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/8/2020	Rachel Steyer	1.0	\$750	\$750	finalizing class member declaration following call with class member declarant	Class Certification
12/8/2020	Rachel Steyer	3.5	\$750	\$2,625	drafting class member declaration, identifying which areas/sections to review and follow up with declarant to get additional information	Class Certification
12/8/2020	Rachel Steyer	2.1	\$750	\$1,575	drafting class member declaration	Class Certification
12/8/2020	Rachel Steyer	0.4	\$750	\$300	follow up call w/class member declarant to ask additional questions to clarify draft declaration	Class Outreach and Contact
12/8/2020	Travis Close	0.6	\$850	\$510	Revisions to draft MTJ letter re: ESI	Case Organization, Planning and Strategy
12/8/2020	Travis Close	1.3	\$850	\$1,105	Meeting with team re: ESI, discovery/document review, residency agreement analysis	Case Organization, Planning and Strategy
12/8/2020	Travis Close	0.8	\$850	\$680	Review & analyze history of construction records organization by doc reviewers for new assignment	Case Organization, Planning and Strategy
12/8/2020	Travis Close	0.4	\$850	\$340	Email to EPO re: incorporating construction records from Defendants' and CDSS's production	Case Organization, Planning and Strategy
12/9/2020	Guy Wallace	1.9	\$1,350	\$2,565	preparation and drafting of supplemental interrogatory answers re access barriers and damages; com's with Waters re same (.4)	Discovery (Non-Deposition)
12/9/2020	Guy Wallace	0.8	\$1,350	\$1,080	com's with GG; BBK; JY; AX; MTJ; TCC re supplemental responses to D's discovery; document analysis issues	Discovery (Non-Deposition)
12/9/2020	Guy Wallace	0.5	\$1,350	\$675	preparation and drafting of supplemental interrogatory answers re damages of named P's	Discovery (Non-Deposition)
12/9/2020	Mark Johnson	0.9	\$1,150	\$1,035	call w/ team members to discuss supplemental responses to rogs and doc requests, privilege log, other discovery issues	Discovery (Non-Deposition)
12/9/2020	Rachel Steyer	1.0	\$750	\$750	meeting w/eidler team (GBW, MTJ, TCC, RAB) + co-counsel to discuss upcoming deadlines	Case Organization, Planning and Strategy
12/9/2020	Rachel Steyer	3.4	\$750	\$2,550	drafting class member declaration, updating sharepoint	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/9/2020	Rachel Steyer	0.5	\$750	\$375	starting draft declaration for class member	Class Certification
12/9/2020	Rachel Steyer	0.5	\$750	\$375	follow up call w/class member to determine whether they wished to serve as declarant, answered additional questions about case	Class Outreach and Contact
12/9/2020	Rachel Steyer	0.4	\$750	\$300	working on spreadsheet to track declarants and ESI search for residency agreements	Discovery (Non-Deposition)
12/9/2020	Rachel Steyer	0.4	\$750	\$300	reviewing documents sent from cocounsel in advance of supplemental production	Discovery (Non-Deposition)
12/9/2020	Travis Close	1.0	\$850	\$850	Team meeting re: supplemental responses, deposition strategy, privilege logs	Case Organization, Planning and Strategy
12/9/2020	Travis Close	0.3	\$850	\$255	Analyze draft list of named plaintiff access barriers by GBW	Case Organization, Planning and Strategy
12/9/2020	Travis Close	0.3	\$850	\$255	Email to BMU re: new RFPs/ROGs	Discovery (Non-Deposition)
12/10/2020	Guy Wallace	0.6	\$1,350	\$810	preparation and drafting of P's supplemental interrogatory answer re damages of the named P's	Discovery (Non-Deposition)
12/10/2020	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re draft privilege log	Discovery (Non-Deposition)
12/10/2020	Guy Wallace	2.6	\$1,350	\$3,510	preparation and drafting of P's interrogatory response re damages; revise and edit same	Discovery (Non-Deposition)
12/10/2020	Guy Wallace	0.7	\$1,350	\$945	review and analysis of Waters draft report re barriers at Scotts Valley facility; com's with Waters re same	Discovery (Non-Deposition)
12/10/2020	Guy Wallace	0.6	\$1,350	\$810	legal research and analysis re Unruh Act and applicability to housing for seniors; access standards re same	Misc. Research
12/10/2020	Mark Johnson	0.7	\$1,150	\$805	call w/ Rachel Steyer re format and revisions to privilege log	Discovery (Non-Deposition)
12/10/2020	Mark Johnson	0.3	\$1,150	\$345	review draft privilege logs	Discovery (Non-Deposition)
12/10/2020	Rachel Steyer	0.3	\$750	\$225	reviewing older class member declaration, highlighting which areas need additional ADA info	Class Certification
12/10/2020	Rachel Steyer	0.3	\$750	\$225	updating older class member draft declaration, identifying physical access section details needed	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/10/2020	Rachel Steyer	0.2	\$750	\$150	reviewing and editing older class member declaration, identifying which additional ADA details missing and where to follow up w/declarant	Class Certification
12/10/2020	Rachel Steyer	0.3	\$750	\$225	reviewing/editing older class member declaration draft, identifying which parts of ADA section require additional info	Class Certification
12/10/2020	Rachel Steyer	0.3	\$750	\$225	reviewing and editing class member draft declaration, flagging areas of ada section for additional info	Class Certification
12/10/2020	Rachel Steyer	0.3	\$750	\$225	reviewing older class member declaration, minor edits, reviewing for additional access barriers to follow up about	Class Certification
12/10/2020	Rachel Steyer	0.3	\$750	\$225	reviewing old class member draft declaration, determining what additional info needed in access barriers section	Class Certification
12/10/2020	Rachel Steyer	0.3	\$750	\$225	drafting and editing older class member draft declaration, flagging areas for additional follow up regarding access barriers	Class Certification
12/10/2020	Rachel Steyer	0.2	\$750	\$150	reviewing old class member draft declaration, flagging section for additional access barriers info	Class Certification
12/10/2020	Rachel Steyer	0.3	\$750	\$225	reviewing older class member draft declaration, minor edits, flagging access section for additional information	Class Certification
12/10/2020	Rachel Steyer	0.5	\$750	\$375	partial drafting of class member declaration	Class Certification
12/10/2020	Rachel Steyer	0.8	\$750	\$600	live answered calls with class members/representatives, explaining facts of case, updating info in sharepoint	Class Outreach and Contact
12/10/2020	Rachel Steyer	0.5	\$750	\$375	reviewing Barrier List for Brookdale facility provided by GBW	Misc. Research
12/10/2020	Travis Close	0.6	\$850	\$510	Review/analyze draft inspection report of scotts valley facility by GBW	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/10/2020	Travis Close	0.5	\$850	\$425	Review/analyze class member privilege log by RLS	Case Organization, Planning and Strategy
12/10/2020	Travis Close	0.3	\$850	\$255	Analyze spreadsheet of new plaintiffs' production shared by co-counsel	Discovery (Non-Deposition)
12/11/2020	Rachel Steyer	1.1	\$750	\$825	reviewing and editing CBM draft class member declaration	Class Certification
12/11/2020	Rachel Steyer	0.3	\$750	\$225	reviewing older class member declaration, making edits, identifying which parts of ADA section need additional info	Class Certification
12/11/2020	Rachel Steyer	0.3	\$750	\$225	call w/KDL to review discrepancies in privilege log	Discovery (Non-Deposition)
12/11/2020	Rachel Steyer	5.0	\$750	\$3,750	creating new and revised privilege log based on feedback from MTJ; creating two versions, one for internal use and one for production, reviewing for errors, formatting, double checking communications	Discovery (Non-Deposition)
12/11/2020	Rachel Steyer	0.2	\$750	\$150	email to GBW and MTJ with revised privilege logs, explaining differences and revisions	Discovery (Non-Deposition)
12/11/2020	Travis Close	0.2	\$850	\$170	Email to EPO re: DSS construction records assignment	Case Organization, Planning and Strategy
12/11/2020	Travis Close	0.6	\$850	\$510	Review/analyze BBK edits and comments on privilege log	Discovery (Non-Deposition)
12/11/2020	Travis Close	0.8	\$850	\$680	Legal research re: whether attorneys have to be present in communications at meetings discussing advice	Discovery (Non-Deposition)
12/12/2020	Guy Wallace	0.8	\$1,350	\$1,080	analysis of potential settlement positions re damages and injunctive relief; com's with MTJ re same (.4)	Settlement
12/14/2020	Mark Johnson	0.5	\$1,150	\$575	call w/ TCC re privilege log	Discovery (Non-Deposition)
12/14/2020	Mark Johnson	0.3	\$1,150	\$345	call w/ Rachel S re revisions to privilege log	Discovery (Non-Deposition)
12/14/2020	Mark Johnson	1.2	\$1,150	\$1,380	revisions to 2 draft discovery logs	Discovery (Non-Deposition)
12/14/2020	Rachel Steyer	0.7	\$750	\$525	revising older class member draft declaration, identifying areas needed for further follow up (ADA)	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/14/2020	Rachel Steyer	0.8	\$750	\$600	editing older class member draft declaration, reviewing corresponding residency agreement and class member documents to fill in blank info	Class Certification
12/14/2020	Rachel Steyer	0.4	\$750	\$300	phone call w/RBBG paralegal Karen Stillber to review brookdale complaint spreadsheet	Class Outreach and Contact
12/14/2020	Rachel Steyer	0.2	\$750	\$150	reviewing forwarded communications from Karen Stilber re Brookdale complaint log	Class Outreach and Contact
12/14/2020	Rachel Steyer	0.3	\$750	\$225	reviewing spreadsheet provided by Karen Stilber	Class Outreach and Contact
12/14/2020	Rachel Steyer	0.6	\$750	\$450	phone call w/class member from Brookdale complaint sheet, answered questions about lawsuit	Class Outreach and Contact
12/14/2020	Rachel Steyer	0.4	\$750	\$300	phone call w/class member from Brookdale complaint spreadsheet, answered questions about case	Class Outreach and Contact
12/14/2020	Rachel Steyer	0.5	\$750	\$375	outreach with class members, answering questions about case, assessing for strenght of claims and possible intake	Class Outreach and Contact
12/14/2020	Rachel Steyer	0.3	\$750	\$225	phone call w/MTJ to review privilege log	Discovery (Non-Deposition)
12/14/2020	Rachel Steyer	1.4	\$750	\$1,050	revising communication descriptions and privileges following conversation with MTJ	Discovery (Non-Deposition)
12/14/2020	Travis Close	0.2	\$850	\$170	Email to AX & team re: edits to privilege logs	Discovery (Non-Deposition)
12/14/2020	Travis Close	0.2	\$850	\$170	Email from BBK articulating changes in Ps' general supplemental responses/language on damages	Discovery (Non-Deposition)
12/14/2020	Travis Close	0.3	\$850	\$255	Meet with MTJ re: privilege logs	Discovery (Non-Deposition)
12/14/2020	Travis Close	0.1	\$850	\$85	Email to MTJ re: updated privilege log	Discovery (Non-Deposition)
12/14/2020	Travis Close	0.6	\$850	\$510	Further editis and revisions to privilege log & record of entries deleted	Discovery (Non-Deposition)
12/15/2020	Mark Johnson	0.3	\$1,150	\$345	call w/ R Stiner re billing issue and ltr re taking residents out of facility. review ltr re same	Case Organization, Planning and Strategy
12/15/2020	Mark Johnson	0.1	\$1,150	\$115	emial exchange w/ OC GLM re privilge log	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/15/2020	Mark Johnson	0.7	\$1,150	\$805	calls w/ GCG and Karen S. re documents on privilege log, custodians, source and history for revisions to privilege log	Discovery (Non-Deposition)
12/15/2020	Mark Johnson	0.7	\$1,150	\$805	calls w/ TCC (x2) re issues pertaining to privilege log	Discovery (Non-Deposition)
12/15/2020	Mark Johnson	4.8	\$1,150	\$5,520	review underlying doc for privilege log and revise log; format and serve	Discovery (Non-Deposition)
12/15/2020	Mark Johnson	0.1	\$1,150	\$115	email to RS, TCC, RAB re privilege log issues	Discovery (Non-Deposition)
12/15/2020	Mark Johnson	1.4	\$1,150	\$1,610	call with client Stacy Stiner to review info for supplemental rog responses	Discovery (Non-Deposition)
12/15/2020	Rachel Steyer	0.5	\$750	\$375	reviewing older draft class member declaration, identifying areas in ADA section for follow up	Class Certification
12/15/2020	Rachel Steyer	0.5	\$750	\$375	revising older draft class member declaration, flagging sections for follow up	Class Certification
12/15/2020	Rachel Steyer	0.4	\$750	\$300	outreach call to class member from Brookdale complaint spreadsheet, answered questions, scheduled intake call	Class Outreach and Contact
12/15/2020	Rachel Steyer	0.2	\$750	\$150	phone call w/class member's daughter, wanted to review the case and answer questions regarding what her mother's obligations would be	Class Outreach and Contact
12/15/2020	Rachel Steyer	0.2	\$750	\$150	phone call w/husband of class member from Brookdale complaint spreadsheet, provided contact info and info about case	Class Outreach and Contact
12/15/2020	Rachel Steyer	0.4	\$750	\$300	phone call w/class member from Brookdale complaint spreadsheet, answered questions about case, scheduled intake call	Class Outreach and Contact
12/15/2020	Rachel Steyer	2.3	\$750	\$1,725	conducted intake call with class member from Brookdale complaint sheet	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/15/2020	Rachel Steyer	0.2	\$750	\$150	received call back from class member from Brookdale complaint spreadsheet, discussed the case, answered questions, determined not a good fit for intake/declaration	Class Outreach and Contact
12/15/2020	Rachel Steyer	0.4	\$750	\$300	phone call w/class member from Brookdale complaint spreadsheet, answered questions about lawsuit, scheduled intake call	Class Outreach and Contact
12/15/2020	Rachel Steyer	1.0	\$750	\$750	attempted class outreach with contacts on Brookdale complaint spreadsheet, leaving VMs	Class Outreach and Contact
12/15/2020	Travis Close	0.2	\$850	\$170	Email from BBK re: CLRA damages analysis for plaintiff art lindstrom	Case Organization, Planning and Strategy
12/15/2020	Travis Close	0.3	\$850	\$255	Call with MTJ re: unknown authors in privilege log	Case Organization, Planning and Strategy
12/15/2020	Travis Close	0.2	\$850	\$170	Email to MTJ, team re: additional redactions needed for Sandy and Mary docs	Case Organization, Planning and Strategy
12/15/2020	Travis Close	0.5	\$850	\$425	Call with MTJ re: issues to be fixed in privilege log	Discovery (Non-Deposition)
12/15/2020	Travis Close	0.2	\$850	\$170	Email from JY re: statutory damages issue with plaintiffs	Discovery (Non-Deposition)
12/15/2020	Travis Close	0.3	\$850	\$255	Review/analyze draft supplemental ROG responses for Plaintiff Boris from JY	Discovery (Non-Deposition)
12/15/2020	Travis Close	1.1	\$850	\$935	Changes to privilege log including two new columns detailing additional info (# 1-40)	Discovery (Non-Deposition)
12/15/2020	Travis Close	0.9	\$850	\$765	Changes to privilege log including two new columns detailing additional info (# 41-80)	Discovery (Non-Deposition)
12/15/2020	Travis Close	0.8	\$850	\$680	Changes to privilege log including two new columns detailing additional info (# 80-150)	Discovery (Non-Deposition)
12/15/2020	Travis Close	0.9	\$850	\$765	Changes to privilege log including two new columns detailing additional info (# 150-230)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/15/2020	Travis Close	0.5	\$850	\$425	Double check withholdings/redactions for sandy grant and mary helm per co-counsel concerns	Discovery (Non-Deposition)
12/16/2020	Guy Wallace	2.8	\$1,350	\$3,780	review and analysis of draft supplemental interrogatory responses for Jestrabek-Hart; Lindstrom; Schmidt; Carlson; Boris; revise and edit same	Discovery (Non-Deposition)
12/16/2020	Guy Wallace	1.1	\$1,350	\$1,485	tc with BBK; JY; AX; BU; MTJ; TCC; RLS re supplemental discovery responses	Discovery (Non-Deposition)
12/16/2020	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re supplemental discovery responses re barriers	Discovery (Non-Deposition)
12/16/2020	Guy Wallace	0.4	\$1,350	\$540	com's with BU re supplemental discovery responses re Schmidt	Discovery (Non-Deposition)
12/16/2020	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ re preparation of privilege logs	Discovery (Non-Deposition)
12/16/2020	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re D's failure to produce ESI; failure to complete production of documents; MTC re same	Discovery (Non-Deposition)
12/16/2020	Mark Johnson	1.3	\$1,150	\$1,495	call w/ Marks and Thornton to review sufficiency of assessment data and timekeeping data and identify additional data needed	Discovery (Non-Deposition)
12/16/2020	Mark Johnson	1.1	\$1,150	\$1,265	team call re strategic issues re response to interrogatory requests	Discovery (Non-Deposition)
12/16/2020	Mark Johnson	1.4	\$1,150	\$1,610	telephone conference w/ Stacy Stiner to review information for responses to interrogatories.	Discovery (Non-Deposition)
12/16/2020	Mark Johnson	0.2	\$1,150	\$230	call w/ R Stiner re communications with Stacy and communication with county health dept. re Covid form letter	Discovery (Non-Deposition)
12/16/2020	Mark Johnson	0.2	\$1,150	\$230	call with GBW re privilege log issue	Discovery (Non-Deposition)
12/16/2020	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW re ESI, document production; potential motion, responses to Ds discovery	Discovery (Non-Deposition)
12/16/2020	Mark Johnson	0.1	\$1,150	\$115	draft email to OC re ESI	Discovery (Non-Deposition)
12/16/2020	Mark Johnson	3.0	\$1,150	\$3,450	work on Stiner responses to interrogatories, including consultation w/ COC re language	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/16/2020	Mark Johnson	1.0	\$1,150	\$1,150	draft memo to Marks / Thorton re analysis of staffing and assessment data produced, additional items or clarification needed, analysis of list of facilities in data and scope of staffing analysis	Discovery (Non-Deposition)
12/16/2020	Mark Johnson	0.5	\$1,150	\$575	coms w/ TCC re differences in facility list and facilities in data; review prior information re facilities.	Discovery (Non-Deposition)
12/16/2020	Mark Johnson	0.3	\$1,150	\$345	call w/ J Mastin re findings at Hemet facility for responses to Quinlan rogs	Discovery (Non-Deposition)
12/16/2020	Mark Johnson	0.4	\$1,150	\$460	calls (x2) with County Health dept. re form letter provided to client concerning Covid	Misc. Research
12/16/2020	Rachel Steyer	0.3	\$750	\$225	reviewing class member declarant's records from ESI	Class Certification
12/16/2020	Rachel Steyer	0.6	\$750	\$450	revising and updating older draft class member declaration	Class Certification
12/16/2020	Rachel Steyer	1.5	\$750	\$1,125	conducted partial intake call w/class member, scheduled f/u call, created client folder	Class Outreach and Contact
12/16/2020	Rachel Steyer	1.2	\$750	\$900	conducted partial intake call w/class member, set up follow up time to touch base about procuring documents to continue intake call	Class Outreach and Contact
12/16/2020	Rachel Steyer	0.4	\$750	\$300	received call back from class member from Brookdale complaint spreadsheet, spoke about lawsuit, not eligible to be part of class b/c she's in Independent living	Class Outreach and Contact
12/16/2020	Rachel Steyer	0.2	\$750	\$150	returning missed calls, left VMs w/daughter of class member with whom conducted partial intake earlier today	Class Outreach and Contact
12/16/2020	Rachel Steyer	0.7	\$750	\$525	phone call w/class member from Brookdale complaint spreadsheet, answered questions about caes	Class Outreach and Contact
12/16/2020	Rachel Steyer	1.1	\$750	\$825	phone call conference with Brookdale team (RAB, MTJ, TCC, GBW) + co counsel RBGG	Discovery (Non-Deposition)
12/16/2020	Rachel Steyer	0.5	\$750	\$375	reviewing barrier list circulated by GBW	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/16/2020	Travis Close	0.3	\$850	\$255	Email from JY re: analysis of barriers experienced by plaintiff edward boris	Case Organization, Planning and Strategy
12/16/2020	Travis Close	0.6	\$850	\$510	Prep for team meeting -- review notes & tasks from prior meetings	Case Organization, Planning and Strategy
12/16/2020	Travis Close	1.1	\$850	\$935	Team meeting re: document review (supp ROG responses)	Case Organization, Planning and Strategy
12/16/2020	Travis Close	0.4	\$850	\$340	Review/analyze draft Fountaingrove report by Gary Waters for general barrier categories	Case Organization, Planning and Strategy
12/16/2020	Travis Close	0.3	\$850	\$255	Add additional entries to "nonprivileged log", record of entries removed from privileged log	Case Organization, Planning and Strategy
12/16/2020	Travis Close	0.1	\$850	\$85	Email to MTJ re: number of facilities used for staffing analysis	Case Organization, Planning and Strategy
12/16/2020	Travis Close	1.9	\$850	\$1,615	Analysis of facility names in staffing analysis by david marks	Case Organization, Planning and Strategy
12/16/2020	Travis Close	0.3	\$850	\$255	Email to MTJ re: transition dates for new facilities	Case Organization, Planning and Strategy
12/16/2020	Travis Close	0.2	\$850	\$170	Email to MTJ re: 2 facility discrepancies in staffing analysis data	Case Organization, Planning and Strategy
12/16/2020	Travis Close	0.2	\$850	\$170	Email by GBW re: analysis of common physical access barriers experienced by all plaintiffs	Class Certification
12/16/2020	Travis Close	0.5	\$850	\$425	Review/analyze edits by MTJ to draft privilege log	Discovery (Non-Deposition)
12/16/2020	Travis Close	0.2	\$850	\$170	Email to MTJ re; entries removed from privilege log before production	Discovery (Non-Deposition)
12/17/2020	Guy Wallace	0.6	\$1,350	\$810	review and analysis of letter from Maatman re ESI and proposed search terms	Discovery (Non-Deposition)
12/17/2020	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re response to letter from Maatman re ESI	Discovery (Non-Deposition)
12/17/2020	Guy Wallace	1.2	\$1,350	\$1,620	review and analysis of further supplemental interrogatory responses re Stiner; Schmidt; barriers identified at Brookdale Hemet	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/17/2020	Guy Wallace	0.4	\$1,350	\$540	review and analysis of supplemental responses re Quinlan; com's with AX re same	Discovery (Non-Deposition)
12/17/2020	Mark Johnson	0.2	\$1,150	\$230	review and analyze ltr from OC and attached list of search terms to be used; email to GBW re same.	Discovery (Non-Deposition)
12/17/2020	Mark Johnson	1.5	\$1,150	\$1,725	roundtrip drive to Brookdale San Ramon to meet with client, obtain verification on supplemental rog responses,review potions of grounds and lobby area and confer re rog responses and barriers.	Discovery (Non-Deposition)
12/17/2020	Mark Johnson	0.4	\$1,150	\$460	meet with client and faiclity for discussion of supp rog respones, obaining verification; review of portions of grounds and lobby area.	Discovery (Non-Deposition)
12/17/2020	Mark Johnson	4.8	\$1,150	\$5,520	review, revise, edit and finalize suippleental rog response and multiple coms w/ COC re changes in language, strategy,identification of barriers to include in respone to some rogs.	Discovery (Non-Deposition)
12/17/2020	Mark Johnson	3.0	\$1,150	\$3,450	Misc to be recategorized - call w/ TCC re assignments; corres w/ OC and draft corres shared wih COC re search terms, ESI, review docs and discovery request re task times and move out reports; coms w/ GBW re disovery projects, responses to OC re ESI, strategy on motion.	Discovery (Non-Deposition)
12/17/2020	Rachel Steyer	0.3	\$750	\$225	editing KAJ draft declaration	Class Certification
12/17/2020	Rachel Steyer	0.5	\$750	\$375	follow up call w/class member declarant, reviewed additional ADA questions	Class Certification
12/17/2020	Rachel Steyer	0.4	\$750	\$300	phone call w/class member declarant, reviewing additional ADA questions	Class Certification
12/17/2020	Rachel Steyer	0.7	\$750	\$525	call w/class member declarant to review additional ADA questions, clarify outstanding details in his declaration	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/17/2020	Rachel Steyer	0.7	\$750	\$525	attempted follow up outreach with class member declarants to address additional ADA questions, leaving VMs	Class Certification
12/17/2020	Rachel Steyer	0.4	\$750	\$300	phone call w/class member declarant to review additional ADA questions	Class Certification
12/17/2020	Rachel Steyer	0.2	\$750	\$150	received call back from potential class member from Brookdale complaint spreadsheet, spoke with him and answered questions, determined not a class member b/c he resided in Independent Living	Class Outreach and Contact
12/17/2020	Rachel Steyer	0.2	\$750	\$150	phone call w/class member from Brookdale complaint spreadsheet, received family member's contact info to reach out to	Class Outreach and Contact
12/17/2020	Rachel Steyer	0.2	\$750	\$150	phone call w/class member from Brookdale complaint spreadsheet, said she needed to discuss w/perosnal attorney following individual settlement, provided contact info	Class Outreach and Contact
12/17/2020	Rachel Steyer	1.1	\$750	\$825	phone call w/class member from Brookdale complaint spreadsheet, discussed case, answered questions, determined not ot be a good fit for intake/declaration	Class Outreach and Contact
12/17/2020	Rachel Steyer	0.3	\$750	\$225	phone call w/class member from Brookdale complaint spreadsheet, set up intake call	Class Outreach and Contact
12/17/2020	Rachel Steyer	0.2	\$750	\$150	phone call w/class member from Brookdale complaint spreadsheet, scheduled intake call	Class Outreach and Contact
12/17/2020	Rachel Steyer	0.3	\$750	\$225	received return call from class member from Brookdale complaint spreadsheet, answered questions, scheduled intake	Class Outreach and Contact
12/17/2020	Rachel Steyer	0.4	\$750	\$300	conducted follow up call w/class member declarant, reviewed additional ADA questions	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/17/2020	Rachel Steyer	0.2	\$750	\$150	received return call from class member from Brookdale complaint spreadsheet, scheduled intake call	Class Outreach and Contact
12/17/2020	Travis Close	0.3	\$850	\$255	Review/analyze Ds letter re: search terms and custodians	Case Organization, Planning and Strategy
12/17/2020	Travis Close	0.6	\$850	\$510	Call from MTJ re: helping experts run software model; supplying of blueprints & operational dates for facilities	Case Organization, Planning and Strategy
12/17/2020	Travis Close	0.2	\$850	\$170	Email to EPO, JMP re: two assignments for gathering material for staffing experts	Case Organization, Planning and Strategy
12/17/2020	Travis Close	0.9	\$850	\$765	Analyze RPDs propounded to-date which may include resident move-in data	Case Organization, Planning and Strategy
12/17/2020	Travis Close	1.5	\$850	\$1,275	Review and analyze prior meet and confer correspondance regarding move-ins/admissions/census data	Discovery (Non-Deposition)
12/18/2020	Guy Wallace	0.7	\$1,350	\$945	review and analysis of supplemental responses re Stiner & proposed com's to D's re ESI searches and custodians; com's with co-counsel re same	Discovery (Non-Deposition)
12/18/2020	Guy Wallace	0.6	\$1,350	\$810	review and analysis of draft letter from MTJ to Maatman re ESI; revise and edit same; com's with MTJ re same	Discovery (Non-Deposition)
12/18/2020	Guy Wallace	0.6	\$1,350	\$810	com's with co-counsel re supplemental responses to D's Interrogatories and RFPs re Plaintiffs	Discovery (Non-Deposition)
12/18/2020	Guy Wallace	0.5	\$1,350	\$675	review and analysis of preliminary draft of report re Tracy facility; com's with Waters re same	Experts (Including Retention)
12/18/2020	Mark Johnson	0.7	\$1,150	\$805	review draft final stiner rog/rpd responses; com w/ LEC and RBBG counsel re final edits and filing	Discovery (Non-Deposition)
12/18/2020	Mark Johnson	0.3	\$1,150	\$345	calls w/ GBW re plaintiff document production; D producation of ESI and draft letter brief	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/18/2020	Mark Johnson	0.6	\$1,150	\$690	revise and send email response to D's counsel re ESI production, history of meet and confer and deadlines, proposed motion.	Discovery (Non-Deposition)
12/18/2020	Mark Johnson	1.2	\$1,150	\$1,380	draft email response to D counsel re ESI meet and confer history, positions on deadline for ESI production and potential motion	Discovery (Non-Deposition)
12/18/2020	Mark Johnson	0.3	\$1,150	\$345	email exchanges x4 with COC re clients use of search terms	Discovery (Non-Deposition)
12/18/2020	Mark Johnson	0.4	\$1,150	\$460	draft email to OC re missing or questionable records in timekeeping data; including explanation and chart with example	Discovery (Non-Deposition)
12/18/2020	Mark Johnson	0.7	\$1,150	\$805	draft email to staffing experts re results of review of production re task times, move out dates; requests for same and relevance to staffing analysis	Experts (Including Retention)
12/18/2020	Mark Johnson	5.4	\$1,150	\$6,210	draft P section of ltr brief iso deadline for ESI	Other Motions
12/18/2020	Rachel Steyer	0.4	\$750	\$300	follow up phone call w/class member declarant to review additional ADA questions	Class Certification
12/18/2020	Rachel Steyer	0.6	\$750	\$450	follow up call w/class member declarant, reviewed additional ADA questions	Class Certification
12/18/2020	Rachel Steyer	0.3	\$750	\$225	follow up phone call w/class member declarant to review additional ADA questions	Class Certification
12/18/2020	Rachel Steyer	0.6	\$750	\$450	phone call w/class member declarant, reviewing additional ADA questions	Class Certification
12/18/2020	Rachel Steyer	0.3	\$750	\$225	follow up call w/class member declarant, reviewed additional ADA questions	Class Certification
12/18/2020	Rachel Steyer	1.2	\$750	\$900	follow up phone call with class member declarant, reviewed additional ADA questions	Class Certification
12/18/2020	Rachel Steyer	0.2	\$750	\$150	follow up call w/class member declarant, reviewing additional ADA questions	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/18/2020	Rachel Steyer	0.3	\$750	\$225	follow up call w/class member declarant to review additional ADA questions	Class Certification
12/18/2020	Rachel Steyer	0.2	\$750	\$150	follow up phone call w/class member to review additional ADA questions	Class Certification
12/18/2020	Rachel Steyer	0.3	\$750	\$225	follow up call w/class member from Brookdale complaint spreadsheet, scheduled intake call	Class Outreach and Contact
12/18/2020	Rachel Steyer	0.3	\$750	\$225	follow up call w/class member from Brookdale complaint spreadsheet, determined not a good fit for intake/declaration	Class Outreach and Contact
12/18/2020	Rachel Steyer	0.5	\$750	\$375	follow up phone call w/class member from Brookdale complaint spreadsheet, answered questions about case, scheduled intake call	Class Outreach and Contact
12/18/2020	Rachel Steyer	0.4	\$750	\$300	partial intake conducted w/class member from Brookdale complaint spreadsheet, determined not to proceed forward with rest of intake, not a good fit for declaration	Class Outreach and Contact
12/18/2020	Rachel Steyer	0.6	\$750	\$450	conducted partial intake w/class member from Brookdale complaint spreadsheet, determined not a good fit for intake or declaration due to lack fo strong claims	Class Outreach and Contact
12/18/2020	Travis Close	0.4	\$850	\$340	Prep for meeting w/ EPO and JMP re: informationl gathering assignments for staffing expert	Case Organization, Planning and Strategy
12/18/2020	Travis Close	0.2	\$850	\$170	Email latest version of discovery tracking spreadsheet to LEC for new assignment	Case Organization, Planning and Strategy
12/18/2020	Travis Close	0.3	\$850	\$255	Review analysis from David Marks re: why move-out dates are important to staffing software analyses	Case Organization, Planning and Strategy
12/18/2020	Travis Close	1.3	\$850	\$1,105	Analyze evidence of movein/moveout reports and underlying systems and aggregate export capabilities	Case Organization, Planning and Strategy
12/18/2020	Travis Close	0.9	\$850	\$765	Analyze and retrieve prior correspondance submitted to Court re: ESI for new joint letter brief	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/18/2020	Travis Close	1.0	\$850	\$850	Legal research re: whether Ds are required to use their own search terms in absence of agreement	Case Organization, Planning and Strategy
12/18/2020	Travis Close	0.7	\$850	\$595	Meeting w/ EPO, JMP re: blueprints and operational dates gathering for staffing experts	Discovery (Non-Deposition)
12/18/2020	Travis Close	0.3	\$850	\$255	Email to MTJ, co-counsel, staffing experts re: RFPs covering move-out data	Discovery (Non-Deposition)
12/18/2020	Travis Close	0.2	\$850	\$170	Email to LEC, JMP re: current version of master spreadsheet & direction for future versions	Discovery (Non-Deposition)
12/20/2020	Guy Wallace	1.1	\$1,350	\$1,485	legal research and analysis re recent class certification decisions re CLRA and UCL claims; Montana district court decision concluding that nursing homes are covered by the ADA	Class Certification
12/21/2020	Mark Johnson	0.5	\$1,150	\$575	call w/ R Stiner re text and email communmctions and strategies for retrieving same; other docuemnts to produce	Discovery (Non-Deposition)
12/21/2020	Rachel Steyer	0.5	\$750	\$375	follow up phone call w/class member declarant to review additional ADA questions	Class Certification
12/21/2020	Rachel Steyer	0.5	\$750	\$375	completed follow up ADA questions w/class member declarant	Class Certification
12/21/2020	Rachel Steyer	0.5	\$750	\$375	reviewing older draft declaration, flagging ADA section for additional info	Class Certification
12/21/2020	Rachel Steyer	0.6	\$750	\$450	reviewing older class member draft declaration, flagging barriers section for additional follow up	Class Certification
12/21/2020	Rachel Steyer	0.2	\$750	\$150	received follow up phone call from class member from Brookdale complaint spreadsheet, scheduled intake call	Class Outreach and Contact
12/21/2020	Rachel Steyer	1.3	\$750	\$975	continued partial intake w/class member from Brookdale complaint spreadsheet, scheduled additional follow up conversation to complete intake	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/21/2020	Rachel Steyer	1.7	\$750	\$1,275	conducted intake call w/class member from Brookdale complaint spreadsheet, created client folder, scheduled follow up call to discuss serving as declarant	Class Outreach and Contact
12/21/2020	Rachel Steyer	1.3	\$750	\$975	finished intake call w/class member from Brookdale complaint spreadsheet	Class Outreach and Contact
12/22/2020	Guy Wallace	1.0	\$1,350	\$1,350	review and analysis of D's portion of joint discovery letter to MJ Beeler re ESI issues; com's with MTJ re same	Other Motions
12/22/2020	Mark Johnson	0.5	\$1,150	\$575	research verizon website and chat online w/ verizon employee re access to Stacy's texts	Discovery (Non-Deposition)
12/22/2020	Mark Johnson	0.4	\$1,150	\$460	calls w/ GBW (x3) re response to D's section of joint ltr brief re ESI	Other Motions
12/22/2020	Mark Johnson	3.5	\$1,150	\$4,025	review D's section of draft ltr brief on ESI; review GBW comments on same; re-draft plaitiffs section and research history of meet and confer and court filings for revisiions, send to GBW for further comment.	Other Motions
12/22/2020	Rachel Steyer	0.5	\$750	\$375	editing CBM draft class member declaration	Class Certification
12/22/2020	Rachel Steyer	0.2	\$750	\$150	email to class member declarant to set up phone call	Class Certification
12/22/2020	Rachel Steyer	1.5	\$750	\$1,125	reviewing and editing CBM draft class member declaration	Class Certification
12/22/2020	Rachel Steyer	0.6	\$750	\$450	editing and reviewing older class member declaration, flagging for additional ADA follow up	Class Certification
12/22/2020	Rachel Steyer	0.9	\$750	\$675	editing older draft class member declaration coupled with reviewing residency agreements and other documents to supplement/clarify missing info in declaration	Class Certification
12/22/2020	Rachel Steyer	0.7	\$750	\$525	editing older class member draft declaration, flagging ADA section for revision/follow up	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/22/2020	Rachel Steyer	0.8	\$750	\$600	conducted partial intake with class member from Brookdale complaint spreadsheet, created client folder, scheduled next intake call	Class Outreach and Contact
12/22/2020	Rachel Steyer	0.2	\$750	\$150	email to co-counsel at RBGG regarding outreach with putative class member	Class Outreach and Contact
12/22/2020	Rachel Steyer	0.2	\$750	\$150	received call back from class member from Brookdale complaint spreadsheet, answered questions, scheduled intake call	Class Outreach and Contact
12/23/2020	Guy Wallace	0.6	\$1,350	\$810	legal research and analysis re D's duty to conduct readily achievable barrier removal; Ninth Circuit decision in Catalina case	Class Certification
12/23/2020	Guy Wallace	0.6	\$1,350	\$810	preparation of memo re key facts to prove for class certification	Class Certification
12/23/2020	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of draft letter to MJ Beeler; revise and edit same; com's with MTJ re same	Discovery (Non-Deposition)
12/23/2020	Guy Wallace	1.3	\$1,350	\$1,755	legal research and analysis re D's obligation to produce ESI	Discovery (Non-Deposition)
12/23/2020	Mark Johnson	0.8	\$1,150	\$920	draft email to OC re deadline for production and specific categories of documents not yet produced, review relativity database for same	Discovery (Non-Deposition)
12/23/2020	Mark Johnson	3.0	\$1,150	\$3,450	review recently produced docs and notes re same	Discovery (Non-Deposition)
12/23/2020	Mark Johnson	0.7	\$1,150	\$805	revise lltr brief re ESI, including incorporating GBW edits and adding other points; send to OC with cover, review responsivce email, com w/ GBW re same	Other Motions
12/23/2020	Rachel Steyer	0.2	\$750	\$150	received call back from class member declarant, reviewed additiona ADA access questions	Class Certification
12/23/2020	Rachel Steyer	0.6	\$750	\$450	revising older class member draft declaration, flagging ADA section for follow up	Class Certification
12/23/2020	Rachel Steyer	1.0	\$750	\$750	additional editing and revisions to CBM draft class member declaration	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/23/2020	Rachel Steyer	0.6	\$750	\$450	reviewing and revising older class member draft declaration, flagging ADA section for follow up	Class Certification
12/23/2020	Rachel Steyer	0.6	\$750	\$450	editing older draft class member declaration, flagging ADA section for further follow up	Class Certification
12/23/2020	Rachel Steyer	0.7	\$750	\$525	revising older class member declaration, flagging ADA section for additional follow up and clarification	Class Certification
12/23/2020	Rachel Steyer	0.7	\$750	\$525	revising older class member declaration, flagging for ADA follow up	Class Certification
12/23/2020	Rachel Steyer	0.8	\$750	\$600	conducted partial intake w/class member from Brookdale complaint spreadsheet, scheduled continued intake call, created client folder	Class Outreach and Contact
12/23/2020	Rachel Steyer	0.5	\$750	\$375	received return call from class member from Brookdale complaint spreadsheet, answered questions about case, scheduled intake call	Class Outreach and Contact
12/24/2020	Guy Wallace	2.2	\$1,350	\$2,970	preparation of list of deponents and topics for class certification	Class Certification
12/24/2020	Rachel Steyer	0.7	\$750	\$525	editing CBM class member draft declaration	Class Certification
12/24/2020	Rachel Steyer	1.3	\$750	\$975	reviewing and editing CBM draft class member declaration	Class Certification
12/24/2020	Rachel Steyer	0.8	\$750	\$600	editing KDL draft class member declaration	Class Certification
12/24/2020	Rachel Steyer	0.9	\$750	\$675	editing CBM draft class member declaration	Class Certification
12/28/2020	Guy Wallace	1.1	\$1,350	\$1,485	legal research and analysis re D's affirmative duty to produce ESI	Discovery (Non-Deposition)
12/28/2020	Guy Wallace	0.6	\$1,350	\$810	review and analysis of draft of joint letter to MJ Beeler re ESI disputes; revise and edit same; com's with MTJ re same	Discovery (Non-Deposition)
12/28/2020	Mark Johnson	0.2	\$1,150	\$230	review and analyze ltr from OC re discovery of photographs	Discovery (Non-Deposition)
12/28/2020	Mark Johnson	1.0	\$1,150	\$1,150	research re discovery of expert photos	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/28/2020	Mark Johnson	4.0	\$1,150	\$4,600	review doc and doc production tracking spreadsheet and task list; update same	Discovery (Non-Deposition)
12/28/2020	Mark Johnson	0.9	\$1,150	\$1,035	edit and revise ltr brief re ESI to get under 3 pages of P sectionmn; email to GBW re same	Other Motions
12/28/2020	Mark Johnson	0.7	\$1,150	\$805	com w/ GBW re ltr brief re ESI and make revisions to same; send with cover email to OC	Other Motions
12/28/2020	Rachel Steyer	0.5	\$750	\$375	editing older class member draft declaration	Class Certification
12/28/2020	Rachel Steyer	0.4	\$750	\$300	follow up call w/class member, decided that she no longer wished to participate/serve as a declarant, updated sharepoint to reflect accordingly	Class Certification
12/28/2020	Rachel Steyer	0.4	\$750	\$300	editing older draft class member declaration, flagging areas for review and follow up	Class Certification
12/28/2020	Rachel Steyer	0.4	\$750	\$300	follow up call w/class member declarant, reviewed additional ADA questions	Class Certification
12/28/2020	Rachel Steyer	0.7	\$750	\$525	follow up call w/class member declarant to review additional ADA access questions, clarify dates	Class Certification
12/28/2020	Rachel Steyer	0.5	\$750	\$375	editing older draft of class member declaration, flagging sections for further review and follow up with declarant	Class Certification
12/28/2020	Rachel Steyer	1.1	\$750	\$825	editing and reviewing older draft class member declaration, flagging ADA section for additional follow up	Class Certification
12/28/2020	Rachel Steyer	0.9	\$750	\$675	editing and reviewing older draft class member declaration, flagging ADA section for further follow up	Class Certification
12/28/2020	Rachel Steyer	0.5	\$750	\$375	editing and reviewing older draft class member declaration, flagging for ADA section to follow up	Class Certification
12/28/2020	Rachel Steyer	0.6	\$750	\$450	editing and reviewing older draft of clsas member declaration, flagging for additional ADA follow up	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/28/2020	Rachel Steyer	1.1	\$750	\$825	conducted partial intake call w/class member from Brookdale complaint spreadsheet, determined she did not wish to participate/serve as declarant	Class Outreach and Contact
12/29/2020	Guy Wallace	1.1	\$1,350	\$1,485	preparation of memo re key facts to establish for class certification motion	Class Certification
12/29/2020	Guy Wallace	0.6	\$1,350	\$810	analysis of D's demand for expert photographs of Brookdale facilities; com's with MTJ re same	Discovery (Non-Deposition)
12/29/2020	Rachel Steyer	0.5	\$750	\$375	follow up call w/class member declarant to review additional ADA questions	Class Certification
12/29/2020	Rachel Steyer	0.2	\$750	\$150	check in call w/class member, decided she could not serve as declarant at this time, made note to follow up in a few months	Class Certification
12/29/2020	Rachel Steyer	0.3	\$750	\$225	follow up phone call w/class member declarant, reviewed additional ADA questions	Class Certification
12/29/2020	Rachel Steyer	0.6	\$750	\$450	follow up call w/class member declarant, clarified a few details for declaration and reviewed additional ADA questions	Class Certification
12/29/2020	Rachel Steyer	0.6	\$750	\$450	follow up phone call w/class member declarant, reviewed additional ADA questions	Class Certification
12/29/2020	Rachel Steyer	0.3	\$750	\$225	leaving VMs w/class member declarants, hoping to follow up about additional ADA questions	Class Certification
12/29/2020	Rachel Steyer	0.3	\$750	\$225	follow up phone call w/class member declarant to review additional ADA questions	Class Certification
12/29/2020	Rachel Steyer	0.7	\$750	\$525	attempted communications w/class member declarants to review additional ADA questions, left VMs	Class Certification
12/29/2020	Rachel Steyer	0.7	\$750	\$525	editing and reviewing KAJ draft class member declaration, reviewing resident files as well to review dates in declaration	Class Certification
12/29/2020	Rachel Steyer	2.5	\$750	\$1,875	drafting class member declaration, updating sharepoint	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/29/2020	Rachel Steyer	0.4	\$750	\$300	conducted partial intake w/class member, wanted a few days to look through her documetns and records, scheduled next call	Class Outreach and Contact
12/29/2020	Rachel Steyer	0.2	\$750	\$150	email to outreach team (CBM, KDL, KAJ, TSJ) w/reminder to review residenchy agreements/folder w/resident files	Class Outreach and Contact
12/29/2020	Rachel Steyer	0.2	\$750	\$150	reviewing and updating residency agreement spreadsheet	Discovery (Non-Deposition)
12/30/2020	Guy Wallace	0.6	\$1,350	\$810	analysis of staffing information for presentation in P's MCC	Class Certification
12/30/2020	Guy Wallace	0.9	\$1,350	\$1,215	com's with DTM re staffing analysis of Brookdale facilities	Experts (Including Retention)
12/30/2020	Guy Wallace	0.4	\$1,350	\$540	review and analysis of further draft of joint letter re ESI discovery; com's with MTJ re same	Other Motions
12/30/2020	Mark Johnson	4.0	\$1,150	\$4,600	work on ltr responding to D's re production of expert photos, legal research re same; revise ltr based on revised reading of cases	Discovery (Non-Deposition)
12/30/2020	Rachel Steyer	1.1	\$750	\$825	editing and drafting additional portions of class member declaration	Class Certification
12/30/2020	Rachel Steyer	1.3	\$750	\$975	editing/drafting older BCR class member declaration	Class Certification
12/30/2020	Rachel Steyer	2.2	\$750	\$1,650	completed intake call w/class member from Brookdale complaint spreadsheet, created client folder	Class Outreach and Contact
12/30/2020	Rachel Steyer	0.5	\$750	\$375	updating sharepoint data to reflect ESI records that have been located	Class Outreach and Contact
12/30/2020	Rachel Steyer	0.2	\$750	\$150	scheduled follow up call w/class member declarant to review additional ADA questions	Class Outreach and Contact
12/31/2020	Guy Wallace	0.5	\$1,350	\$675	review and analysis of draft letter from MTJ to Maatman re D's demand for P's expert photographs of Brookdale facilities; revise and edit same	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/31/2020	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re joint letter to MJ Beeler re ESI; D's failure to produce move-out data; preparation of sample of facilities for staffing analysis for class certification	Discovery (Non-Deposition)
12/31/2020	Guy Wallace	1.5	\$1,350	\$2,025	review and analysis of draft joint letter to MJ Beeler re ESI sent by D's on December 30, including three versions of same; revise and edit same; com's with MTJ re same	Other Motions
12/31/2020	Rachel Steyer	0.4	\$750	\$300	reviewing new residency agreements for class member declarant, double checking dates in declaration, flagging for review	Class Certification
12/31/2020	Rachel Steyer	2.3	\$750	\$1,725	drafting class member declaration	Class Certification
12/31/2020	Rachel Steyer	0.2	\$750	\$150	attempted contact w/class members from Brookdale complaint spreadsheet, left VMs	Class Outreach and Contact
1/4/2021	Guy Wallace	1.8	\$1,350	\$2,430	preparation of memo re key facts and discovery needed for class certification	Class Certification
1/4/2021	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ re discovery issues and preparation for further meet and confer and potential MTC's re discovery needed for class certification	Discovery (Non-Deposition)
1/4/2021	Mark Johnson	0.2	\$1,150	\$230	review TCC proposal for residency agreement analysis	Case Organization, Planning and Strategy
1/4/2021	Mark Johnson	0.8	\$1,150	\$920	call w/ GBW re document managment issues; residency agreement project; proposed meeting w/ co-counsel, court's order on ESI;	Discovery (Non-Deposition)
1/4/2021	Mark Johnson	4.4	\$1,150	\$5,060	review document production from 12/23 and prepare memo re overview of same and categorie of documents produced	Discovery (Non-Deposition)
1/4/2021	Mark Johnson	0.3	\$1,150	\$345	call w/ TCC re discovery tasks and residency agreement analysis project	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/4/2021	Mark Johnson	0.2	\$1,150	\$230	email exchange w/ OC re apparent missing bates numbers	Discovery (Non-Deposition)
1/4/2021	Rachel Steyer	0.5	\$750	\$375	received call back from class member declarant, reviewed additional ADA questions	Class Certification
1/4/2021	Rachel Steyer	0.5	\$750	\$375	received call back from class member declarant, reviewed additional ADA questions	Class Certification
1/4/2021	Rachel Steyer	0.3	\$750	\$225	follow up call w/class member declarant to review additional ADA access questions	Class Certification
1/4/2021	Rachel Steyer	0.8	\$750	\$600	follow up call w/class member declarant to review additional ADA questions	Class Certification
1/4/2021	Rachel Steyer	0.5	\$750	\$375	drafted partial class member declaration	Class Certification
1/4/2021	Rachel Steyer	1.4	\$750	\$1,050	drafting class member declaration	Class Certification
1/4/2021	Rachel Steyer	1.5	\$750	\$1,125	finished partial intake call w/class member	Class Outreach and Contact
1/4/2021	Rachel Steyer	0.3	\$750	\$225	follow up call w/class member to review additional ADA questions, class member reiterated desire to not serve as declarant, terminated call	Class Outreach and Contact
1/4/2021	Rachel Steyer	0.2	\$750	\$150	email to KDL, CBM, KAJ, TSJ with latest reminders and updates about outreach and declaration drafting	Class Outreach and Contact
1/4/2021	Rachel Steyer	0.3	\$750	\$225	reviewing sharepoint notes/spreadsheet regarding intake and declaration tracking, pulling up older intakes to reexamine for possible declaration drafting	Class Outreach and Contact
1/4/2021	Travis Close	0.5	\$850	\$425	Call with MTJ re: new tasks for document analysis	Case Organization, Planning and Strategy
1/4/2021	Travis Close	0.8	\$850	\$680	Analysis of scope of latest production, including accessible transportation policies and emergency evacuation issues	Case Organization, Planning and Strategy
1/4/2021	Travis Close	0.6	\$850	\$510	Review prior analysis of residency agreements with minor revisions in language	Case Organization, Planning and Strategy
1/4/2021	Travis Close	0.4	\$850	\$340	Email to RAB, MTJ, GBW re: new residency agreement assignments	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/5/2021	Guy Wallace	2.2	\$1,350	\$2,970	preparation of memo re key points for discovery and class certification	Class Certification
1/5/2021	Mark Johnson	5.8	\$1,150	\$6,670	review and analyze on an overview basis Brookdale's latest production of 7k + docs (37K pages), including emails	Discovery (Non-Deposition)
1/5/2021	Mark Johnson	0.4	\$1,150	\$460	draft memo to file and co-counsel re analysis of latest document production including ESI	Discovery (Non-Deposition)
1/5/2021	Mark Johnson	0.1	\$1,150	\$115	call w/ GBW re initial review of latest production from Ds and examples of emails concerning SA benchmarks.	Discovery (Non-Deposition)
1/5/2021	Mark Johnson	0.1	\$1,150	\$115	follow up email to OC re task time studies, move out dates, floor plans.	Discovery (Non-Deposition)
1/5/2021	Rachel Steyer	1.5	\$750	\$1,125	drafting class member declaration	Class Certification
1/5/2021	Rachel Steyer	2.5	\$750	\$1,875	conducting class member intake call, created client folder	Class Outreach and Contact
1/5/2021	Rachel Steyer	0.5	\$750	\$375	partial outreach call, decided that would be best to wait until receipt of client documents to review for further follow up, rescheduled call for next week	Class Outreach and Contact
1/5/2021	Rachel Steyer	0.2	\$750	\$150	outreach call w/class member, spoke about case and answered questions, scheduled intake	Class Outreach and Contact
1/5/2021	Rachel Steyer	0.2	\$750	\$150	outreach call to class member, spoke about case, suggested to contact brother	Class Outreach and Contact
1/5/2021	Rachel Steyer	0.4	\$750	\$300	outreach call w/class member, discussed case, scheduled intake call for next week	Class Outreach and Contact
1/5/2021	Rachel Steyer	0.3	\$750	\$225	reviewing and updated declarant tracking spreadsheet w/additional names to search for residency agreements	Discovery (Non-Deposition)
1/5/2021	Travis Close	0.2	\$850	\$170	Email from RAB re: initiating residency agreement review assignment	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/5/2021	Travis Close	1.2	\$850	\$1,020	Analyze recent staff reviews on Indeed complaining about working conditions	Case Organization, Planning and Strategy
1/5/2021	Travis Close	1.4	\$850	\$1,190	Investigate & update cast of characters to prep for depositions	Case Organization, Planning and Strategy
1/5/2021	Travis Close	1.6	\$850	\$1,360	Search for recent ESI/emails produced & add relevant actors to cast of characters	Case Organization, Planning and Strategy
1/5/2021	Travis Close	1.0	\$850	\$850	Review/analyze recent emails produced from regional directors re: staffing levels	Discovery (Non-Deposition)
1/6/2021	Guy Wallace	0.3	\$1,350	\$405	com's with Waters re draft reports re Brookdale facilities	Discovery (Non-Deposition)
1/6/2021	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re schedule issues and status of discovery and items to compel	Discovery (Non-Deposition)
1/6/2021	Guy Wallace	0.8	\$1,350	\$1,080	preparation of Rule 30(b)(6) depo notice	Discovery (Non-Deposition)
1/6/2021	Mark Johnson	0.8	\$1,150	\$920	coms x2 w/ /GBW re outstanding discovery issues and tasks, planning for mtg w/ GCG, D's response to requests for status of certain productions, possible request to extend deadline for class cert motion.	Case Organization, Planning and Strategy
1/6/2021	Mark Johnson	3.2	\$1,150	\$3,680	review doc production and planning re remaining discovery to be completed.	Case Organization, Planning and Strategy
1/6/2021	Mark Johnson	0.4	\$1,150	\$460	coms w/ Justin and Edgar re targeted seardhe and analysis for staffing, benchnmark and other key words and issues.	Discovery (Non-Deposition)
1/6/2021	Mark Johnson	0.3	\$1,150	\$345	review and analyze memo from JP and example of documents re staffing methodology.	Discovery (Non-Deposition)
1/6/2021	Mark Johnson	0.1	\$1,150	\$115	review response from oc to request for info on status of document production.	Discovery (Non-Deposition)
1/6/2021	Mark Johnson	0.2	\$1,150	\$230	review and respond to email from D Marks re floor plans and prioritizing of facilities for staffing analysis.	Discovery (Non-Deposition)
1/6/2021	Rachel Steyer	0.2	\$750	\$150	follow up call w/class member declarant to review additional ADA questions	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/6/2021	Rachel Steyer	2.2	\$750	\$1,650	drafting class member declaration	Class Certification
1/6/2021	Rachel Steyer	2.2	\$750	\$1,650	finishing intake call with class member	Class Outreach and Contact
1/6/2021	Rachel Steyer	0.4	\$750	\$300	called class member back, discussed the case, answered questions, scheduled intake call	Class Outreach and Contact
1/6/2021	Travis Close	1.4	\$850	\$1,190	Continue review & analysis of recent producton of staffing emails by regional executives	Case Organization, Planning and Strategy
1/6/2021	Travis Close	1.1	\$850	\$935	Legal research re: when elderly assisted living tenants do not need to provide 30 day notice	Case Organization, Planning and Strategy
1/6/2021	Travis Close	1.7	\$850	\$1,445	Continue adding to cast of characters from ESI in Def's latest production	Case Organization, Planning and Strategy
1/6/2021	Travis Close	1.5	\$850	\$1,275	Legal research re: residents' bill of rights; eviction procedures; evictions and when 30 day notice is required	Case Organization, Planning and Strategy
1/6/2021	Travis Close	0.2	\$850	\$170	Email from JMP discussing work on staffing doc analysis	Case Organization, Planning and Strategy
1/6/2021	Travis Close	0.2	\$850	\$170	Email from Gerry (OC) re: status of doc deficiency identification and needs for occupancy reports	Communications With Opposing Counsel
1/7/2021	Guy Wallace	1.6	\$1,350	\$2,160	preparation of tasks and assignments for discovery and class certification motion; com's with MTJ; GG re same (.4)	Class Certification
1/7/2021	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re discovery for class certification and meet and confer with D's re same	Class Certification
1/7/2021	Guy Wallace	0.7	\$1,350	\$945	tc with GG; MTJ re preparation for class certification and tasks and assignments re same	Class Certification
1/7/2021	Guy Wallace	2.1	\$1,350	\$2,835	preparation of memo re key facts for class certification motion; review and analysis of Third Amended Complaint	Class Certification
1/7/2021	Guy Wallace	0.2	\$1,350	\$270	com's with Marks re staffing analysis	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/7/2021	Mark Johnson	0.8	\$1,150	\$920	call w/ GBW and GCG re overall strategy and tasks for class certification motion, allocation of work and timing for depos, possible request for additional time to file	Case Organization, Planning and Strategy
1/7/2021	Mark Johnson	0.6	\$1,150	\$690	coms x 3 w/GBW re key task list for class cert motion; review and comment on same;	Case Organization, Planning and Strategy
1/7/2021	Mark Johnson	0.3	\$1,150	\$345	call w/ Marks and Thorton re needs for staffing analysis - move-in/move out dates and language for demand of same	Discovery (Non-Deposition)
1/7/2021	Mark Johnson	1.3	\$1,150	\$1,495	draft response to GLM email re missing categories of documents and fail to provide substantive response; revise same based on input from COC wrt to description of documents.	Discovery (Non-Deposition)
1/7/2021	Mark Johnson	1.0	\$1,150	\$1,150	search and review document production re pendant systems and data and take notes re same	Discovery (Non-Deposition)
1/7/2021	Rachel Steyer	0.9	\$750	\$675	updating and editing class member declaration based on additional ADA information	Class Certification
1/7/2021	Rachel Steyer	0.2	\$750	\$150	conducted outreach call w/class member, scheduled intake call	Class Outreach and Contact
1/7/2021	Rachel Steyer	0.2	\$750	\$150	received call back from class member, answered questions	Class Outreach and Contact
1/7/2021	Travis Close	1.7	\$850	\$1,445	Analysis of Brookdale facilities which have been current throughout class period	Case Organization, Planning and Strategy
1/7/2021	Travis Close	0.2	\$850	\$170	Review/analyze proposed response by MTJ To O/C re: moveout data	Case Organization, Planning and Strategy
1/7/2021	Travis Close	0.5	\$850	\$425	Analyze progress on assignment for gathering floor plans for our staffing expert	Case Organization, Planning and Strategy
1/7/2021	Travis Close	0.6	\$850	\$510	Analyze recent M/C correspondance re: custodians	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/7/2021	Travis Close	1.2	\$850	\$1,020	Run search on move in/move out reports, analyze results, for staffing experts	Case Organization, Planning and Strategy
1/7/2021	Travis Close	0.5	\$850	\$425	Review/analyze memo by class member to management at Brookdale San Jose re: deficiencies in care	Case Organization, Planning and Strategy
1/7/2021	Travis Close	0.7	\$850	\$595	edits to proposed custodians before sharing with co-counsel	Case Organization, Planning and Strategy
1/7/2021	Travis Close	1.8	\$850	\$1,530	Continue analyzing recent ESI emails produced to add new employees to cast of characters	Class Certification
1/8/2021	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ; TCC re discovery and document analysis re benchmarks and service alignment; pendant data	Discovery (Non-Deposition)
1/8/2021	Guy Wallace	0.3	\$1,350	\$405	com's with Waters re draft reports re facilities	Experts (Including Retention)
1/8/2021	Mark Johnson	1.5	\$1,150	\$1,725	review portions to TAC; prepare chart tracking info on Ps	Case Organization, Planning and Strategy
1/8/2021	Mark Johnson	1.2	\$1,150	\$1,380	weekly meeting with document reviewers re assignments for targeted reviews, projects and findings	Discovery (Non-Deposition)
1/8/2021	Mark Johnson	0.3	\$1,150	\$345	call w/ B Umpierre re strategy for raising multiple discovery issues re task time studies and CLM with discovery referee and proposed ltr requesting telephone confernce	Discovery (Non-Deposition)
1/8/2021	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re dicoverly issues, recap of mtg w/ doc reviewers	Discovery (Non-Deposition)
1/8/2021	Mark Johnson	1.2	\$1,150	\$1,380	review JP memo and documents on use of pendant call systems	Discovery (Non-Deposition)
1/8/2021	Mark Johnson	0.1	\$1,150	\$115	email exchange w/ OC re meeting and conferring on pendant call system data	Discovery (Non-Deposition)
1/8/2021	Mark Johnson	0.8	\$1,150	\$920	review prior memos and draft pleadings re abritration for cll w/ co-counsel re strategy on Falkenberg motion to compel arbitration	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/8/2021	Rachel Steyer	1.8	\$750	\$1,350	drafting class member declaration	Class Certification
1/8/2021	Rachel Steyer	2.6	\$750	\$1,950	received call back from class member, completed intake, created client file, updated info in sharepoint	Class Outreach and Contact
1/8/2021	Rachel Steyer	1.2	\$750	\$900	reviewing full list of Brookdale facilities, compiling spreadsheet to track outstanding locations	Class Outreach and Contact
1/8/2021	Travis Close	1.3	\$850	\$1,105	Analyze history of executive directors at Hemet facility	Case Organization, Planning and Strategy
1/8/2021	Travis Close	1.2	\$850	\$1,020	Research executive director history at scotts valley facility	Case Organization, Planning and Strategy
1/8/2021	Travis Close	0.9	\$850	\$765	Research executive director history at Windsor facility	Case Organization, Planning and Strategy
1/8/2021	Travis Close	1.1	\$850	\$935	Research executive director history for Tracy facility	Case Organization, Planning and Strategy
1/8/2021	Travis Close	1.0	\$850	\$850	Research executive director history for San Ramon facility	Case Organization, Planning and Strategy
1/8/2021	Travis Close	0.4	\$850	\$340	Compile spreadsheet of ED history at plaintiff facilities and send to team	Case Organization, Planning and Strategy
1/8/2021	Travis Close	0.2	\$850	\$170	Email to AXU re: sharing saved search on Relativity with recently produced ESI	Case Organization, Planning and Strategy
1/11/2021	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re discovery issues and meet and confer efforts with Maatman re same	Discovery (Non-Deposition)
1/11/2021	Mark Johnson	3.7	\$1,150	\$4,255	work on supplemental responses to discovery propounded to named Plaintiffs; email memos to/from COC, review of documentts and prior emails; draft memo to OC re status of same;	Discovery (Non-Deposition)
1/11/2021	Mark Johnson	3.3	\$1,150	\$3,795	review of floor plans produced and list of same; com w/ experts re availability of same; prepare fore uploading	Discovery (Non-Deposition)
1/11/2021	Rachel Steyer	1.7	\$750	\$1,275	drafting class member declaration	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/11/2021	Rachel Steyer	2.4	\$750	\$1,800	conducted intake call w/class member, created client folder, updated sharepoint	Class Outreach and Contact
1/11/2021	Rachel Steyer	0.2	\$750	\$150	outreach phone call w/class member, answered questions and provided contact info	Class Outreach and Contact
1/11/2021	Rachel Steyer	0.2	\$750	\$150	received call back from outstanding class member/incomplete intake, gave her update, scheduled follow up call to continue intake	Class Outreach and Contact
1/11/2021	Rachel Steyer	0.3	\$750	\$225	outreac call, spoke w/class member, answered questions, scheduled intake call	Class Outreach and Contact
1/11/2021	Rachel Steyer	0.4	\$750	\$300	received call back from class member, answered more questions about case, updated contact info to send email	Class Outreach and Contact
1/11/2021	Rachel Steyer	0.4	\$750	\$300	reviewing documents provided by class member	Discovery (Non-Deposition)
1/11/2021	Travis Close	0.5	\$850	\$425	Analyze status of blueprint gathering assignment for staffing expert	Case Organization, Planning and Strategy
1/11/2021	Travis Close	1.2	\$850	\$1,020	Update building records subpoenas chart with latest productions and communications with jurisdictions; analyze tasks remaining for completion	Case Organization, Planning and Strategy
1/11/2021	Travis Close	0.3	\$850	\$255	Email to DTM re: which type of floorplans needed for staffing analysis	Case Organization, Planning and Strategy
1/11/2021	Travis Close	0.3	\$850	\$255	Email to team re: latest status on building record subpoenas production	Discovery (Non-Deposition)
1/12/2021	Mark Johnson	0.6	\$1,150	\$690	review memo from COC AX re service alignment and staffing related documents.	Case Organization, Planning and Strategy
1/12/2021	Mark Johnson	0.9	\$1,150	\$1,035	call w/ D Marks and Jjim Thorton re floor plans and labor reports and missing data for staffing analysis	Discovery (Non-Deposition)
1/12/2021	Mark Johnson	0.8	\$1,150	\$920	begin review of 1/8/2021 production in Relativity	Discovery (Non-Deposition)
1/12/2021	Mark Johnson	1.5	\$1,150	\$1,725	review native production of various labor reports and other spreadsheets in latest production before documents are loaded to relativity	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/12/2021	Rachel Steyer	0.4	\$750	\$300	received call from class member declarant requesting update, provided additional information to add to declaration	Class Certification
1/12/2021	Rachel Steyer	1.6	\$750	\$1,200	editing and drafting class member declaration	Class Certification
1/12/2021	Rachel Steyer	0.3	\$750	\$225	outreach call w/class member, only wanted to talk informally, gave contact info to pass along to other residents	Class Outreach and Contact
1/12/2021	Rachel Steyer	0.3	\$750	\$225	call back to class member, answered questions about case, scheduled intake call	Class Outreach and Contact
1/12/2021	Rachel Steyer	1.1	\$750	\$825	reviewing scanned docs received from class member declarant	Discovery (Non-Deposition)
1/12/2021	Travis Close	0.9	\$850	\$765	Final review of third party docs received via subpoena, as prepared by RAB, to be sent to defendants	Case Organization, Planning and Strategy
1/12/2021	Travis Close	0.3	\$850	\$255	Email to EPO re: coordination of facility floor plans assignment	Case Organization, Planning and Strategy
1/12/2021	Travis Close	0.2	\$850	\$170	Email to MTJ re: spot-checked third party production ready to be shared with Defs	Discovery (Non-Deposition)
1/13/2021	Guy Wallace	2.7	\$1,350	\$3,645	preparation and drafting of memo re key facts to establish for class certification; review and analysis of TAC	Class Certification
1/13/2021	Mark Johnson	0.2	\$1,150	\$230	emails w/ J Yellen e status of Plaintiff Algarme; proposed solutions, impact on injunctive relief	Case Organization, Planning and Strategy
1/13/2021	Mark Johnson	1.0	\$1,150	\$1,150	prep for meet and confer w/ OC re pendant usage data, task time documents, move out, census and occupancy data, floor plans. review prior communications re these issues and prepare agenda	Discovery (Non-Deposition)
1/13/2021	Mark Johnson	0.6	\$1,150	\$690	meet and confer w/ OC, Travis re task time data, pendant usage data, floor plans, move out data, etc.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/13/2021	Mark Johnson	0.7	\$1,150	\$805	review TCC memo re meet and confer session. draft email to OC summarizing call and outcomes/expectations	Discovery (Non-Deposition)
1/13/2021	Mark Johnson	0.8	\$1,150	\$920	review doc production for Kronos adjustment forms; draft email to Marks/Thorton re same, save to pdf and include examples	Discovery (Non-Deposition)
1/13/2021	Mark Johnson	0.4	\$1,150	\$460	review residency agreements for language pertaining to absences from facility; email to COC Marks, Thorton re same and attempt to obtain missing Kronos data	Discovery (Non-Deposition)
1/13/2021	Mark Johnson	0.2	\$1,150	\$230	review and send to COC Marks and Thornton spreadsheet of production of Labor Detail Reports. email cover to re same	Discovery (Non-Deposition)
1/13/2021	Mark Johnson	1.0	\$1,150	\$1,150	review docs in recent document production	Discovery (Non-Deposition)
1/13/2021	Rachel Steyer	1.9	\$750	\$1,425	conducted intake call w/class member, created client folder, updated sharepoint	Class Outreach and Contact
1/13/2021	Rachel Steyer	1.5	\$750	\$1,125	completed class member intake, created client folder, updated sharepoint	Class Outreach and Contact
1/13/2021	Travis Close	0.5	\$850	\$425	Review/analyze memo by AX (co-counsel) re: service alignment system	Case Organization, Planning and Strategy
1/13/2021	Travis Close	0.6	\$850	\$510	Meeting with MTJ & opposing counsel re: pendant usage data and other discovery issues	Case Organization, Planning and Strategy
1/13/2021	Travis Close	1.1	\$850	\$935	Draft memorandum summarizing today's M/C call with defendants	Case Organization, Planning and Strategy
1/13/2021	Travis Close	0.5	\$850	\$425	Review/analyze first set of floor plans extracted by EPO for sufficiency	Case Organization, Planning and Strategy
1/14/2021	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ re discovery issues; D's staffing policies	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/14/2021	Mark Johnson	3.5	\$1,150	\$4,025	review and analyze remaining documents from R Stiner for supplemental production; prepare noties/direction on each for RAB re redactions, privilege, production	Discovery (Non-Deposition)
1/14/2021	Mark Johnson	1.0	\$1,150	\$1,150	call w/ client R Stiner re ESI, email and texting practices, document retention, questions about notes on documentss	Discovery (Non-Deposition)
1/14/2021	Mark Johnson	0.5	\$1,150	\$575	prepare notes for call w/ client R Stiner re notes on documents and AC privlieged communications and source of documents for supplemental production.	Discovery (Non-Deposition)
1/14/2021	Mark Johnson	0.4	\$1,150	\$460	research aliases for facilities with missing punch data and coms w/ COC david marks re same	Discovery (Non-Deposition)
1/14/2021	Mark Johnson	0.2	\$1,150	\$230	coms w/ Edgar, TCC, Meacham, Marks re Floor Plans and receipt of same	Discovery (Non-Deposition)
1/14/2021	Mark Johnson	0.5	\$1,150	\$575	compose email to OC seeking further explanation re missing Kronos punch data and describing posible explanation based on Kronos Adjustment forms and corrections / additions not included. Seeking additional Kronos Adjustment forms.	Discovery (Non-Deposition)
1/14/2021	Mark Johnson	0.6	\$1,150	\$690	review and analyze sampel of Labor Detail report	Discovery (Non-Deposition)
1/14/2021	Mark Johnson	0.2	\$1,150	\$230	compose email to OC seeking addtional labor detail reports and timetable for production of same, locaing and attaching copy	Discovery (Non-Deposition)
1/14/2021	Mark Johnson	0.9	\$1,150	\$1,035	multiple (x5) communications w D Marks and J Thorton re labor detail reports, occupancy and other reports, format and scope of request, discussion of need and uses.	Discovery (Non-Deposition)
1/14/2021	Mark Johnson	0.7	\$1,150	\$805	review additonal docs produced by R Stiner for supplemental production and preparation for call with her	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/14/2021	Mark Johnson	0.1	\$1,150	\$115	draft email to RAB re supplemental stiner production and instrutions re same.	Discovery (Non-Deposition)
1/14/2021	Rachel Steyer	0.5	\$750	\$375	updating draft class member declaration following additional ADA info	Class Certification
1/14/2021	Rachel Steyer	0.8	\$750	\$600	phone call w/class member, answered questions about case, gave contact info	Class Outreach and Contact
1/14/2021	Rachel Steyer	0.6	\$750	\$450	received call back from class member, answered questions, gave contact info for future follow up per request	Class Outreach and Contact
1/14/2021	Rachel Steyer	1.3	\$750	\$975	conducted intake with class member, created client folder, updated sharepoint	Class Outreach and Contact
1/14/2021	Travis Close	0.2	\$850	\$170	Email to BBK (co-counsel) re: analysis of DSS complaints for class cert	Case Organization, Planning and Strategy
1/14/2021	Travis Close	0.4	\$850	\$340	Review/analyze recent corespondance between MTJ & staffing experts re: additional documents needed to complete staffing analysis	Case Organization, Planning and Strategy
1/14/2021	Travis Close	1.2	\$850	\$1,020	Update chart of DSS citations against Brookdale facilities for use by co-counsel	Class Certification
1/15/2021	Guy Wallace	5.5	\$1,350	\$7,425	preparation of memo re key facts to establish for class certification	Class Certification
1/15/2021	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ; RLS; JY re discovery issues and potential additional current class representatives	Discovery (Non-Deposition)
1/15/2021	Mark Johnson	1.4	\$1,150	\$1,610	document review/analysis meeting w/ RAB, AX, KS, JMP, EO, TCC re doc review and analysis projects, supplemental document production, ESI review and potential deponent profiles	Case Organization, Planning and Strategy
1/15/2021	Mark Johnson	1.5	\$1,150	\$1,725	review notes and prior memos re doc production and analysis status for meeting of doc reviewers.	Discovery (Non-Deposition)
1/15/2021	Rachel Steyer	0.2	\$750	\$150	call with CBM to discuss declarants	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/15/2021	Rachel Steyer	0.8	\$750	\$600	editing and updating class member declaration with additional ADA information	Class Certification
1/15/2021	Rachel Steyer	0.2	\$750	\$150	email to outreach team CBM, KAJ, TSJ, KDL re identifying named plaintiffs	Class Outreach and Contact
1/15/2021	Rachel Steyer	2.8	\$750	\$2,100	reviewing and updating sharepoint and intakes for current/former residents	Class Outreach and Contact
1/15/2021	Rachel Steyer	0.9	\$750	\$675	reviewing class member residency agreements and updating sharepoint to determine arbitration opt-outs	Class Outreach and Contact
1/15/2021	Travis Close	1.0	\$850	\$850	Meeting w/ RAB, MTJ re: two assignments related to analyzing arbitration agreements and ID'ing misrepresentations in residency agreements	Case Organization, Planning and Strategy
1/16/2021	Guy Wallace	2.4	\$1,350	\$3,240	preparation of memo re key facts for class certification; revise and edit same	Class Certification
1/17/2021	Guy Wallace	2.8	\$1,350	\$3,780	preparation of topics and questions for ED depositions	Depositions
1/19/2021	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ; TCC; RLS re analysis of fact record for class certification motion	Class Certification
1/19/2021	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ; TCC re analysis of Residency Agreements	Discovery (Non-Deposition)
1/19/2021	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ re discovery that Defendants needs to produce re staffing formula and tasks times; Defendants failure to produce all of the Kronos data (missing 4% of data re punch times)	Discovery (Non-Deposition)
1/19/2021	Mark Johnson	1.0	\$1,150	\$1,150	call w/ TCC, RAB re review and analysis of residency agreement for representation language, arbitration opt outs and other info, use of JND for same and development of protocol	Case Organization, Planning and Strategy
1/19/2021	Mark Johnson	0.6	\$1,150	\$690	call w/ GBW re residency agreement project, planning for new doc reviewer	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/19/2021	Mark Johnson	0.4	\$1,150	\$460	further call w/ GBW re outline of key facts to establish for class cert, annotationg same with evidence / proof.	Case Organization, Planning and Strategy
1/19/2021	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW re continuing care agreements and issues invovlved in analysis of residency agreements.	Case Organization, Planning and Strategy
1/19/2021	Mark Johnson	2.8	\$1,150	\$3,220	review prior discovery requests and responses and prior email communiction w/OC; draft correspondence to OC re expected production of staffing-related docs and dealdine; draft email to COC Marks, Wallace re proposed edits, additions.	Discovery (Non-Deposition)
1/19/2021	Mark Johnson	1.0	\$1,150	\$1,150	review sample residency agreements and comparre to CCR agreements and counts of differeent productions.	Discovery (Non-Deposition)
1/19/2021	Mark Johnson	0.6	\$1,150	\$690	com w/ TS re shawn cull search; search and review docs in relativity for further info; com w/ EO re searching additional documents.	Discovery (Non-Deposition)
1/19/2021	Rachel Steyer	0.4	\$750	\$300	call w/CBM to discuss class member declarations	Class Certification
1/19/2021	Rachel Steyer	0.5	\$750	\$375	reviewing points and facts to establish for class certification document from GBW	Class Certification
1/19/2021	Rachel Steyer	0.2	\$750	\$150	email response to co-counsel and team re potential new named plaintiff	Class Outreach and Contact
1/19/2021	Travis Close	0.8	\$850	\$680	Analyze existing database in Relativity for CCRC agreements	Case Organization, Planning and Strategy
1/19/2021	Travis Close	1.2	\$850	\$1,020	Review/analyze language-based hits results from Residency Agreements database saved search	Case Organization, Planning and Strategy
1/19/2021	Travis Close	0.2	\$850	\$170	Email to MTJ, RAB re: example CCRC agreements	Case Organization, Planning and Strategy
1/19/2021	Travis Close	1.0	\$850	\$850	Meeting w/ RAB, MTJ re: two assignments related to analyzing misrepresentations and arbitration opt-outs in residency agreements	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/19/2021	Travis Close	0.7	\$850	\$595	Research notice of acknowledgement of receipt for subpoena by mail	Case Organization, Planning and Strategy
1/19/2021	Travis Close	1.2	\$850	\$1,020	Legal research re: requirements for notice of subpoena by mail	Case Organization, Planning and Strategy
1/19/2021	Travis Close	0.4	\$850	\$340	Review/analyze correspondance between San Diego, service agent, and SWCL re: history of attempted subpoena service	Case Organization, Planning and Strategy
1/19/2021	Travis Close	0.3	\$850	\$255	Call to San Diego clerk's office re: issues with acceptance of subpoena for building records	Discovery (Non-Deposition)
1/19/2021	Travis Close	0.4	\$850	\$340	Begin drafting outline of demand letter for San Diego City Atty re: failure to respond to subpoena	Other Motions
1/20/2021	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ; Marks re discovery re staffing analysis	Discovery (Non-Deposition)
1/20/2021	Guy Wallace	0.4	\$1,350	\$540	com's with Maatman; MTJ re production of Residency Agreements and analysis of same	Discovery (Non-Deposition)
1/20/2021	Mark Johnson	0.6	\$1,150	\$690	telephonic mtg w/ JND, Travis, Ryan re residency agreement review project and protocol.	Class Certification
1/20/2021	Mark Johnson	3.4	\$1,150	\$3,910	review docs re J Toomer and begin preparing depo outline	Discovery (Non-Deposition)
1/20/2021	Mark Johnson	0.5	\$1,150	\$575	revise email to OC re productios expected for end of January, coms w/ Marks, GBW re same;	Discovery (Non-Deposition)
1/20/2021	Rachel Steyer	2.2	\$750	\$1,650	received call back from class member, conducted partial intake, scheduled follow up call to continue intake	Class Outreach and Contact
1/20/2021	Rachel Steyer	0.2	\$750	\$150	email to CBM re finalizing declaration	Class Outreach and Contact
1/20/2021	Travis Close	1.3	\$850	\$1,105	Analyze CCRC agreements for location of misrepresentative language	Case Organization, Planning and Strategy
1/20/2021	Travis Close	0.3	\$850	\$255	Review/analyze proposed MTJ letter to O/C re: MIMO reports, staffing software, etc	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/20/2021	Travis Close	0.8	\$850	\$680	Analyze whether any plaintiffs signed CCRC agreements, and whether subsequently signed Brookdale Residency Agreements	Case Organization, Planning and Strategy
1/20/2021	Travis Close	0.2	\$850	\$170	Email to MTJ re: edits to cast of characters	Case Organization, Planning and Strategy
1/20/2021	Travis Close	0.2	\$850	\$170	Email to experts re: floor plans now hosted on dropbox for experts	Case Organization, Planning and Strategy
1/21/2021	Guy Wallace	1.5	\$1,350	\$2,025	prepare for tc with MTJ; TCC; RLS re analysis of documents and deposition preparation re key facts for class certification set out in memo re same	Discovery (Non-Deposition)
1/21/2021	Guy Wallace	1.6	\$1,350	\$2,160	tc with MTJ; TCC; RLS re preparation for depositions and analysis of documents and evidence re key facts for class certification	Discovery (Non-Deposition)
1/21/2021	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re analysis of Residency Agreements and preparation of chart re key facts for class certification and documents for ED depositions	Discovery (Non-Deposition)
1/21/2021	Mark Johnson	0.5	\$1,150	\$575	coms w/ GBW re status of residency agreement review project with JND, class cert proof outline and evidence on some points.	Case Organization, Planning and Strategy
1/21/2021	Mark Johnson	1.8	\$1,150	\$2,070	team call w/ GBW, TCC, RLS to review class cert proof chart and assign tasks, discuss evidence and sources of evidence	Class Certification
1/21/2021	Mark Johnson	3.7	\$1,150	\$4,255	draft coding instructions and protocol for JND review of residency agreements; review and offer revisions to proposed coding panel	Class Certification
1/21/2021	Mark Johnson	0.7	\$1,150	\$805	additional revisions to coding instructions and proposed coding panel based on need to track exhibits to residency agreements and existence of acknowledgement language; draft email to JND re instructions, exemplars, coding panel	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/21/2021	Mark Johnson	0.1	\$1,150	\$115	com w/ D Marks and J. Thorton re analysis of Kronos timekeeping data for info on employee job descriptions at facilities.	Class Certification
1/21/2021	Mark Johnson	0.5	\$1,150	\$575	review emails and contract re JND residency agreement review project; com w/ GBW re same; locate and send protective order for signatures, draft cover email re same	Discovery (Non-Deposition)
1/21/2021	Rachel Steyer	1.7	\$750	\$1,275	meeting with GBW, TCC, MTJ to discuss tasks and assignments needed to prepare for upcoming depositions and outstanding discovery matters	Case Organization, Planning and Strategy
1/21/2021	Rachel Steyer	0.5	\$750	\$375	outreach call w/class member, explained lawsuit and answered questions, scheduled intake call	Class Outreach and Contact
1/21/2021	Rachel Steyer	1.1	\$750	\$825	conducted partial intake call w/class member, created client folder, scheduled follow up call	Class Outreach and Contact
1/21/2021	Rachel Steyer	2.1	\$750	\$1,575	reviewing discovery folders to identify relevant documents to fill in facts based on GBW fact sheet as part of larger class cert motion prep; reading through relevant documents, highlighting facts; annotating document	Discovery (Non-Deposition)
1/21/2021	Travis Close	1.8	\$850	\$1,530	Review/analyze outline from GBW re: list of points/facts to establish for class cert	Case Organization, Planning and Strategy
1/21/2021	Travis Close	0.2	\$850	\$170	Email to RAB re: example of CCRC agreement for mass exclusion in upcoming review	Case Organization, Planning and Strategy
1/21/2021	Travis Close	0.9	\$850	\$765	Review/analyze Def's ROG responses for facts to add in outline before today's meeting	Case Organization, Planning and Strategy
1/21/2021	Travis Close	0.3	\$850	\$255	Email to AX re: new saved search for organizational charts	Case Organization, Planning and Strategy
1/21/2021	Travis Close	0.4	\$850	\$340	Find all organizational charts and create saved search in Relativity	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/21/2021	Travis Close	1.2	\$850	\$1,020	Draft concerns/issues about use of objective criteria in upcoming review of residency agreements to MTJ, RAB	Class Certification
1/21/2021	Travis Close	2.0	\$850	\$1,700	Team meeting with MTJ, RLS, GBW re: facts to establish for class certification	Class Certification
1/22/2021	Guy Wallace	0.3	\$1,350	\$405	com's with JY; MTJ; RLS re outreach re potential current residents who may be willing to serve as Plaintiffs	Class Certification
1/22/2021	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ; RAB re further review and analysis of documents and emails produced by Defendants during January 2021	Discovery (Non-Deposition)
1/22/2021	Mark Johnson	0.6	\$1,150	\$690	call w/ GBW re status of various document review and analysis projects; residency agreement JND project; assignment of research and analysis tasks on class cert issues; analysis of assessment related documents and PSS system	Case Organization, Planning and Strategy
1/22/2021	Mark Johnson	0.3	\$1,150	\$345	Review and analyze revised coding panel, edited coding instructions and comments from RAB for residency agreement review project; email to RAB and TCC re same	Class Certification
1/22/2021	Mark Johnson	0.7	\$1,150	\$805	call w/ RAB, TCC re set up materials for JND residency agreement review project - coding instructions, coding panel and exemplars	Class Certification
1/22/2021	Mark Johnson	2.0	\$1,150	\$2,300	review policy docs re procedures for PSA/PSP for memo re same	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/22/2021	Mark Johnson	3.0	\$1,150	\$3,450	continued work on prep for residency review project by JND, including multiple revisions of coding instructions; coms w/ TCC and RAB re same and re revisions to coding panel, coms w/JND re status, final instructions, exemplars and coding panel; scheduling kick off meeting	Class Certification
1/22/2021	Mark Johnson	0.1	\$1,150	\$115	emal exchange w JND (KM) re status of instructions, coding panel, reiew set for residency agreement reiew project.	Discovery (Non-Deposition)
1/22/2021	Mark Johnson	0.9	\$1,150	\$1,035	weekly team mtg re document review status and special review and analysis projects	Discovery (Non-Deposition)
1/22/2021	Rachel Steyer	0.5	\$750	\$375	conducted partial intake call, rescheduled call to allow class member to locate documents, created client folder	Class Outreach and Contact
1/22/2021	Rachel Steyer	1.1	\$750	\$825	completed intake call w/class member, updated sharepoint	Class Outreach and Contact
1/22/2021	Rachel Steyer	1.8	\$750	\$1,350	completed intake call w/class member, updated sharepoint, scheduled f/u call to discuss declaration drafting process in further detail	Class Outreach and Contact
1/22/2021	Rachel Steyer	0.3	\$750	\$225	email to GBW, MTJ, TCC providing relevant documents for review of potential new named plaintiffs	Class Outreach and Contact
1/22/2021	Travis Close	1.0	\$850	\$850	Edits to proposed coding panel & instructions for RA review assignment for JND	Case Organization, Planning and Strategy
1/22/2021	Travis Close	0.7	\$850	\$595	Meeting w/ MTJ, RAB re: contract review assignmnet	Case Organization, Planning and Strategy
1/22/2021	Travis Close	0.9	\$850	\$765	Final review of coding panel (RAB) and coding instrution (MTJ) before sending to JND for new assignment	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/22/2021	Travis Close	1.2	\$850	\$1,020	Analyze & locate exemplar personnel reports (+ related policies) for assignment to be completed by co-counsel	Case Organization, Planning and Strategy
1/22/2021	Travis Close	0.3	\$850	\$255	Email to KS (co-counsel) re: assignment for locating personnel reports	Case Organization, Planning and Strategy
1/22/2021	Travis Close	0.7	\$850	\$595	Analyze data and discovery responses w/r/t number of residents in class period, residents who signed agreements, and number of residents who did not sign arbitration agreements	Case Organization, Planning and Strategy
1/22/2021	Travis Close	0.6	\$850	\$510	Analyze data and discovery responses w/r/t number of current facilities and total facilities throughout class period	Case Organization, Planning and Strategy
1/22/2021	Travis Close	0.5	\$850	\$425	Analyze Code of Cal regulations re: whether resident is required to acknowledge that they read admissions agreement	Case Organization, Planning and Strategy
1/22/2021	Travis Close	0.2	\$850	\$170	Email to MTJ re: regulations requiring resident to acknowledge review of admissions agreement	Case Organization, Planning and Strategy
1/24/2021	Rachel Steyer	1.6	\$750	\$1,200	reviewing ESI for relevant files to fill out fact chart	Discovery (Non-Deposition)
1/25/2021	Guy Wallace	0.9	\$1,350	\$1,215	preparation of depo outline re ED depositions	Depositions
1/25/2021	Guy Wallace	1.3	\$1,350	\$1,755	preparation of outline re ED depositions; identification of potential exhibits for same	Depositions
1/25/2021	Mark Johnson	0.6	\$1,150	\$690	call w/ JND team, TCC, RAB to kickoff JND review project for residency agreements	Class Certification
1/25/2021	Mark Johnson	0.2	\$1,150	\$230	review materials and prep for JND review kick-off call	Class Certification
1/25/2021	Mark Johnson	0.4	\$1,150	\$460	coms w/ RAB re supplemental production of documents; com w/ OC re same	Discovery (Non-Deposition)
1/25/2021	Mark Johnson	1.5	\$1,150	\$1,725	review document database for docs related to pendant systems.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/25/2021	Mark Johnson	0.2	\$1,150	\$230	email exchanges w/ OC GLM re meet and confer re pendant call sysrtems and requestr for informaiton re same	Discovery (Non-Deposition)
1/25/2021	Mark Johnson	2.7	\$1,150	\$3,105	review docs in new production, save and share w. team key docs or docs of norte	Discovery (Non-Deposition)
1/25/2021	Mark Johnson	0.2	\$1,150	\$230	emails w/ RAB re changes to coding panel, issues w/ attachment family feature; call w/ new reviewers.	Discovery (Non-Deposition)
1/25/2021	Mark Johnson	2.5	\$1,150	\$2,875	review docs in Relativity re PSS, PSA, PSP, including policy documents and sample forms/reports; continue drafting memo re assessment and service plan process	Misc. Research
1/25/2021	Rachel Steyer	1.2	\$750	\$900	reviewing Brokdale AL Policy and Procedure Manual for relevant information, updating facts sheet	Discovery (Non-Deposition)
1/25/2021	Rachel Steyer	0.4	\$750	\$300	reviewing additional documents pulled to locate relevant information to fill in fact sheet	Discovery (Non-Deposition)
1/25/2021	Rachel Steyer	1.8	\$750	\$1,350	searching ESI relativity files to locate relevant documents and information corresponding to internal training and organization	Discovery (Non-Deposition)
1/25/2021	Rachel Steyer	3.4	\$750	\$2,550	searching Relativity for relevant docs and information corresponding to fact sheet for class certification	Discovery (Non-Deposition)
1/25/2021	Travis Close	1.4	\$850	\$1,190	Review/analyze new production of ESI received, including emails from regional to EDs re: SA and bechmarks	Case Organization, Planning and Strategy
1/25/2021	Travis Close	0.2	\$850	\$170	Email to RLS, MTJ, GBW re: meeting to resume discussions on list of key facts to establish	Case Organization, Planning and Strategy
1/25/2021	Travis Close	0.4	\$850	\$340	Update assignment plan re: standardization and corporate control docs, based on last week's meeting notes	Case Organization, Planning and Strategy
1/25/2021	Travis Close	0.8	\$850	\$680	Review/analyze record of Bill Grady, to determine whether still working at Diablo Lodge facility	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/25/2021	Travis Close	1.2	\$850	\$1,020	Review/analyze docs showing service alignment benchmarks from recent ESI production	Case Organization, Planning and Strategy
1/25/2021	Travis Close	0.3	\$850	\$255	Email to team re: analysis of scheduling tool and SA benchmarks	Case Organization, Planning and Strategy
1/25/2021	Travis Close	0.8	\$850	\$680	Analyze custodial search by RAB for depo outline preparation	Depositions
1/25/2021	Travis Close	0.8	\$850	\$680	Investigate whether william grady (possible deponent) is still working at Brookdale, address, current employer, etc	Depositions
1/26/2021	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re potential deponents and exhibits for class cert motion	Depositions
1/26/2021	Guy Wallace	1.2	\$1,350	\$1,620	prepare for and participate in Zoom with MTJ; TCC; RLS re potential document exhibits for ED depos and preparation for same	Discovery (Non-Deposition)
1/26/2021	Mark Johnson	0.2	\$1,150	\$230	email exchanges w. JND lead Marcia Miller re coding questions; email to RAB re change in coding panel	Case Organization, Planning and Strategy
1/26/2021	Mark Johnson	2.3	\$1,150	\$2,645	review org charts, prior analyses of personnell, emails, etc. and prepare list of potential individual capacity deponents; email SW team re same.	Case Organization, Planning and Strategy
1/26/2021	Mark Johnson	2.7	\$1,150	\$3,105	continue work on memo re assessment and personal service plan process; prepare list of relevant documents / depo exhibits.	Case Organization, Planning and Strategy
1/26/2021	Mark Johnson	1.5	\$1,150	\$1,725	zoom mtg w/ GBW, TCC, R Steyer to continue review of Class Cert frameork/issue list, tasks for analysis of same and identification of documents to support issues and as exhiits for facility directors	Class Certification
1/26/2021	Mark Johnson	1.7	\$1,150	\$1,955	review of binders of policy and procedures manuals pertaining to assessments and service plans, other documents of note	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/26/2021	Mark Johnson	0.5	\$1,150	\$575	mtg w/ RAB, Brandon Kelly and Christopher Craig re introduction to reviewing / coding documents and special review projects	Discovery (Non-Deposition)
1/26/2021	Rachel Steyer	1.6	\$750	\$1,200	meeting with GBW, TCC, MTJ to discuss depo prep, relevant documents identified, additional tasks	Case Organization, Planning and Strategy
1/26/2021	Rachel Steyer	1.6	\$750	\$1,200	additional discovery and review of ESI documents for Brookdale training materials	Discovery (Non-Deposition)
1/26/2021	Rachel Steyer	1.8	\$750	\$1,350	reviewing ESI documents in relativity to locate relevant information and documents re transportation and scooter policies	Discovery (Non-Deposition)
1/26/2021	Rachel Steyer	0.6	\$750	\$450	additional searches in relativity to identify relevant documents and information for upcoming depositions	Discovery (Non-Deposition)
1/26/2021	Rachel Steyer	0.7	\$750	\$525	organizing and reviewing documents pulled from relativity	Discovery (Non-Deposition)
1/26/2021	Travis Close	1.3	\$850	\$1,105	Continue drafting memo on SA benchmarks with results from latest ESI	Case Organization, Planning and Strategy
1/26/2021	Travis Close	1.7	\$850	\$1,445	Team meeting re: working through List of Key Facts needed for class certification	Class Certification
1/26/2021	Travis Close	1.3	\$850	\$1,105	SA benchmark review -- latest ESI production -- BKD1761296-BKD1762149 (1-29 of 1661)	Discovery (Non-Deposition)
1/26/2021	Travis Close	1.1	\$850	\$935	SA benchmark review -- latest ESI production -- BKD1762149-BKD1762703 (29-66 of 1661)	Discovery (Non-Deposition)
1/26/2021	Travis Close	1.0	\$850	\$850	SA benchmark review -- latest ESI production -- BKD1762703-BKD1762906 (66-93 of 1661)	Discovery (Non-Deposition)
1/27/2021	Guy Wallace	0.4	\$1,350	\$540	review and analysis of D's transportation policies; com's with MTJ; RLS re same	Discovery (Non-Deposition)
1/27/2021	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ; RLS re policy and procedure documents for ED depositions; potential deponents and MTJ draft list re same	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/27/2021	Mark Johnson	0.4	\$1,150	\$460	call w GBW re collection of depo exhibits for class cert depos; results of review of same, identification of potential deponents	Class Certification
1/27/2021	Mark Johnson	3.0	\$1,150	\$3,450	search for and review documents in review database, including full policy and procedure manuals, emergency manuals, San Ramon - related docs; email to team re results of findings.	Class Certification
1/27/2021	Travis Close	1.1	\$850	\$935	Analyze & organize all DSS Reports produced for San Ramon facility	Case Organization, Planning and Strategy
1/27/2021	Travis Close	1.3	\$850	\$1,105	Analyze San Ramon DSS reports in which citation was issued for potential depo exhibits	Case Organization, Planning and Strategy
1/27/2021	Travis Close	1.6	\$850	\$1,360	Analysis of san ramon citations issued by DSS (in DSS production not found on DSS site)	Class Certification
1/27/2021	Travis Close	0.4	\$850	\$340	Email to team re: San Ramon DSS reports w/ analysis of major citations issued	Class Certification
1/28/2021	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ; GG; AX re preparation for depositions of EDs and documents for same	Discovery (Non-Deposition)
1/28/2021	Mark Johnson	0.3	\$1,150	\$345	review recent class cert decision from Judge Chen in Uber case	Class Certification
1/28/2021	Mark Johnson	2.7	\$1,150	\$3,105	continue review of relativity doc database for assessment and service plan related documents, finalize list and collect docs for depo exhibits	Class Certification
1/28/2021	Mark Johnson	0.7	\$1,150	\$805	finalize search for emergency manuals; com w JMP re additional emergency related documents; circulate list and links to team.	Class Certification
1/28/2021	Mark Johnson	0.4	\$1,150	\$460	review email and memo from Amy Xu re depo strategy, background and recommendations on potential ED depoients	Depositions
1/28/2021	Mark Johnson	0.2	\$1,150	\$230	draft email to OC re proposed depositions, availability of witnesses. review notes for same.	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/28/2021	Mark Johnson	0.1	\$1,150	\$115	coms w/ LEC re depo notices	Depositions
1/28/2021	Mark Johnson	0.2	\$1,150	\$230	email exchanges w/ COC re former ED Sue Ramsey and current affiliation	Depositions
1/28/2021	Mark Johnson	0.2	\$1,150	\$230	draft email to OC re production of supplemental updated class list, locate and attch fields for same	Discovery (Non-Deposition)
1/28/2021	Mark Johnson	0.8	\$1,150	\$920	review draft declaration, intake and other materials for call w/ daughter of potential additional plaintiff, class rep Anna Baium	Other Motions
1/28/2021	Mark Johnson	0.5	\$1,150	\$575	call w/ RLS and daughter of potential class rep Anna Baum re possibly joining case as additional injunctive relief plaintiff and facts relating to same	Other Motions
1/28/2021	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re call w/ Anna Baum and issues generally re potentially seeking leave to add class reps	Other Motions
1/28/2021	Rachel Steyer	0.5	\$750	\$375	phone call w/class member declarant and MTJ regarding potentially serving as named plaintiff	Class Certification
1/28/2021	Rachel Steyer	0.3	\$750	\$225	spoke w/class member, answered questions about case, scheduled intake call	Class Outreach and Contact
1/28/2021	Rachel Steyer	2.7	\$750	\$2,025	reviewing documents to find relevant documents for depositions (searches for employee salaries, resident council meetings, transportation policies)	Discovery (Non-Deposition)
1/28/2021	Travis Close	0.4	\$850	\$340	Review/analyze docs tagged for Stacia Stiner to prepare for San Ramon PMK/ED depo	Case Organization, Planning and Strategy
1/28/2021	Travis Close	0.5	\$850	\$425	Analyze/Locate individual room floor plans for San Ramon facility; Website screenshots; facility floor plans [depo prep]	Depositions
1/29/2021	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW re progress on gathering docs for ED dposi, depo outline, allocartion of work w/ co-counesl	Class Certification
1/29/2021	Mark Johnson	1.3	\$1,150	\$1,495	review doc production database for evidence re incentive pay and bonuses	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/29/2021	Mark Johnson	0.5	\$1,150	\$575	meet and confer call w/ OC and Amy Xu re call pendant data	Discovery (Non-Deposition)
1/29/2021	Mark Johnson	0.5	\$1,150	\$575	call w/ Amy Xu - follow up on results of meet and confer re call pendant data; potential motions to compel on other issues, other discovery and document review tasks	Discovery (Non-Deposition)
1/29/2021	Mark Johnson	0.2	\$1,150	\$230	call w/ client re current status; gathering of text data	Discovery (Non-Deposition)
1/29/2021	Mark Johnson	0.6	\$1,150	\$690	research doc production databae for further infor re pendant data for meet and confer call w/ OC	Discovery (Non-Deposition)
1/29/2021	Travis Close	0.8	\$850	\$680	Weekly doc review meeting (depo prep, staffing analysis, motions to compel)	Case Organization, Planning and Strategy
1/29/2021	Travis Close	1.2	\$850	\$1,020	Continue reviewing/analyzing Stiner-tagged docs, pulling potential exhibits for San Ramon depo prep	Depositions
1/29/2021	Travis Close	0.5	\$850	\$425	Review/analyze docs with Anna Reddy (current ED, San Ramon) for depo prep	Depositions
1/29/2021	Travis Close	0.3	\$850	\$255	Review/analyze memo by AX re: ED and regional staff depo prep	Discovery (Non-Deposition)
1/29/2021	Travis Close	0.9	\$850	\$765	Analyze search results for "drill down" (possible relation to task times) in Weekly labor reports and other budget docs received from Def's	Discovery (Non-Deposition)
1/31/2021	Guy Wallace	2.7	\$1,350	\$3,645	preparation of topics and questions for model depo outline for ED depositions	Depositions
1/31/2021	Rachel Steyer	1.5	\$750	\$1,125	reviewing documents in relativity for relevant documents in preparation for depositions and class certification (focus on marketing emails)	Discovery (Non-Deposition)
2/1/2021	Guy Wallace	3.4	\$1,350	\$4,590	preparation of topics and questions for ED depos	Depositions
2/1/2021	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ; TCC re ED depositions and preparation for same	Depositions
2/1/2021	Guy Wallace	0.7	\$1,350	\$945	com's with BBK; JY; AX; BU; MTJ; TCC; RLS re preparation for ED and 30(b)(6) depos	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/1/2021	Mark Johnson	0.6	\$1,150	\$690	mtg of team to discuss ED depo planning (GBW, TCC, RLS, Yellin, Xu, Bien-Kahn, Umpierre	Depositions
2/1/2021	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW prior to team call re depo planning, proposed assignments, topics	Depositions
2/1/2021	Mark Johnson	0.3	\$1,150	\$345	review GBW depo topics / rough outline and list of categories of exhibits for team meeting re depos	Depositions
2/1/2021	Mark Johnson	1.8	\$1,150	\$2,070	edit, add to draft depo outline for ED depositions, review dos for same	Depositions
2/1/2021	Mark Johnson	0.3	\$1,150	\$345	review ltr from OC re pendant call data; email exchanges w/ AX and TCC re selection of facilities for sample data.	Discovery (Non-Deposition)
2/1/2021	Mark Johnson	3.8	\$1,150	\$4,370	review and analyze native files from 1/29 production; notes on same and save/share examples to file, co-counsel	Discovery (Non-Deposition)
2/1/2021	Rachel Steyer	0.5	\$750	\$375	received call back from class member declarant, reviewed additional ADA questions in intake	Class Certification
2/1/2021	Rachel Steyer	0.6	\$750	\$450	meeting with GBW, TCC, MTJ and RBGG cocounsel to discuss depo prep and exhibits	Depositions
2/1/2021	Rachel Steyer	2.9	\$750	\$2,175	reviewing documents and emails corresponding to potential ED deponent	Depositions
2/1/2021	Rachel Steyer	2.7	\$750	\$2,025	reviewing additional documents in Relativity corresponding to likely ED deponent--facility focused	Depositions
2/1/2021	Rachel Steyer	1.0	\$750	\$750	ongoing document review in preparation for depositions	Depositions
2/1/2021	Travis Close	0.5	\$850	\$425	Team meeting re deposition planning	Case Organization, Planning and Strategy
2/1/2021	Travis Close	1.7	\$850	\$1,445	Analyze list of key facts for class cert to create mini-index for team to input evidence into	Case Organization, Planning and Strategy
2/1/2021	Travis Close	0.7	\$850	\$595	Research which facilities were cited in 2019/2020 for long wait times	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/1/2021	Travis Close	1.4	\$850	\$1,190	Review/analyze custodian Shawn Cull docs for depo prep (#s BKD1625367-BKD1662701, 1-47 of 1737)	Discovery (Non-Deposition)
2/2/2021	Guy Wallace	0.4	\$1,350	\$540	review and analysis of draft discovery re damages prepared by BU; com's with MTJ re same	Discovery (Non-Deposition)
2/2/2021	Mark Johnson	3.5	\$1,150	\$4,025	work on outline for ED depositions	Depositions
2/2/2021	Mark Johnson	0.2	\$1,150	\$230	coms (call and email) w/GBW re additional rogs on damages and other issues.	Discovery (Non-Deposition)
2/2/2021	Mark Johnson	0.8	\$1,150	\$920	revise and add to proposed third set of rogs, including BU damages rogs; email to COC for input on same.	Discovery (Non-Deposition)
2/2/2021	Mark Johnson	0.3	\$1,150	\$345	review analysis of job categories by facility from COC and experts for depo prep	Discovery (Non-Deposition)
2/2/2021	Rachel Steyer	0.3	\$750	\$225	received call back from class member, indicated she could not speak/participate due to prior settlement agreement/waiver she signed with Brookdale	Class Outreach and Contact
2/2/2021	Travis Close	0.3	\$850	\$255	Email to MTJ re: whether call pendant citation facilities have been operating during entire class period	Case Organization, Planning and Strategy
2/3/2021	Mark Johnson	0.3	\$1,150	\$345	email exchanges w/ D Marks re anomalies in timekeeping data, addressing same with opposing counsel.	Case Organization, Planning and Strategy
2/3/2021	Mark Johnson	2.0	\$1,150	\$2,300	review and analyze documents in latest production, including search for task time and task time study information.	Discovery (Non-Deposition)
2/3/2021	Mark Johnson	2.0	\$1,150	\$2,300	revisions and additions to 3rd set of rogs (Carlson 1); research and review of documents for same; coms w/ COC re same	Discovery (Non-Deposition)
2/3/2021	Rachel Steyer	6.1	\$750	\$4,575	reviewing documents in Relativity to locate relevant documents for upcoming depositions	Depositions
2/3/2021	Travis Close	0.8	\$850	\$680	Gather timeline of correspondence with City of San Diego re: refusal to accept service of subpoena	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/3/2021	Travis Close	1.0	\$850	\$850	Draft demand letter to City Atty of San Diego re: City's failure to accept service of subpoena for building records	Case Organization, Planning and Strategy
2/3/2021	Travis Close	0.3	\$850	\$255	Review/analyze draft photo spread for expert report of Hemet facility by JM	Experts (Including Retention)
2/3/2021	Travis Close	0.2	\$850	\$170	Analyze JM's proposed floorplans for bathroom in hemet facility	Experts (Including Retention)
2/3/2021	Travis Close	0.3	\$850	\$255	Review/analyze draft report for Hemet facility by JM	Experts (Including Retention)
2/3/2021	Travis Close	0.3	\$850	\$255	Review draft kronos breakdown spreadsheet by david marks	Experts (Including Retention)
2/4/2021	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ re D's production of ee time and payroll data and anomalies re same and responses thereto; ED depositions	Discovery (Non-Deposition)
2/4/2021	Guy Wallace	0.2	\$1,350	\$270	com's with JY; Waters; Mastin re site inspection reports	Discovery (Non-Deposition)
2/4/2021	Mark Johnson	0.1	\$1,150	\$115	review email from OC re client depos; email to COC re same	Depositions
2/4/2021	Mark Johnson	1.5	\$1,150	\$1,725	continue work on depo outline for EDs	Depositions
2/4/2021	Mark Johnson	0.1	\$1,150	\$115	emails w/ BU re further revisions to 3rd set of rogs	Discovery (Non-Deposition)
2/4/2021	Mark Johnson	4.5	\$1,150	\$5,175	draft 2 more sets of revisions and additions to Carlson Interrogatories, including added rogs for discrepancies in kronos data; prepare exhibit related to same	Discovery (Non-Deposition)
2/4/2021	Rachel Steyer	0.2	\$750	\$150	reviewing class member residency agreement to determine signature/POA	Discovery (Non-Deposition)
2/4/2021	Travis Close	0.2	\$850	\$170	Email to MTJ re: multiple interpretations of "full agreement" in vendor contract review	Case Organization, Planning and Strategy
2/4/2021	Travis Close	0.8	\$850	\$680	Analyze additional examples to use for complaint declaration for BBK; email to BBK describing content of Exhibits in Yarnell re: sunrise complaints	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/4/2021	Travis Close	1.1	\$850	\$935	Depo prep targeted search -- Shawn Cull and benchmarks -- BKD1721467-BKD1722705 (1-16 of 55)	Discovery (Non-Deposition)
2/4/2021	Travis Close	1.2	\$850	\$1,020	Depo prep targeted search -- Shawn Cull and benchmarks BKD1722705-BKD1761501 (16-36 of 55)	Discovery (Non-Deposition)
2/4/2021	Travis Close	0.4	\$850	\$340	Email to team re: analysis of staffing criss at san ramon facility with ED Cull	Discovery (Non-Deposition)
2/4/2021	Travis Close	1.2	\$850	\$1,020	Depo prep targeted search -- Shawn Cull and benchmarks BKD1761501-BKD1787124 (36-55 of 55)	Discovery (Non-Deposition)
2/5/2021	Guy Wallace	1.2	\$1,350	\$1,620	review and analysis of draft site inspection report for Brookdale Brookhurst; com's with Mastin; Waters; Yellin; MTJ re same (.4)	Discovery (Non-Deposition)
2/5/2021	Guy Wallace	0.3	\$1,350	\$405	review and analysis of draft set of interrogatories re numerosity issues and staffing analysis issues; com's with MTJ re same	Discovery (Non-Deposition)
2/5/2021	Mark Johnson	1.5	\$1,150	\$1,725	review staffing memo, notes and doc examples; begin drafting list of Brookdale reports	Case Organization, Planning and Strategy
2/5/2021	Mark Johnson	1.5	\$1,150	\$1,725	review notes of past mtgs and assignments for meeting with doc review team, prepare outline for mtg; review memos and saved searches for same	Discovery (Non-Deposition)
2/5/2021	Mark Johnson	0.5	\$1,150	\$575	mtg w/ doc review team	Discovery (Non-Deposition)
2/5/2021	Mark Johnson	1.0	\$1,150	\$1,150	further revisions to Carlson rogs, including adding request for class lsit info, review prior stip and order on class contact discovery; coms w/ staff re finalizing and serving same	Discovery (Non-Deposition)
2/5/2021	Mark Johnson	0.2	\$1,150	\$230	review email from OC and draft joint discovery letter re photographs from inspections.	Discovery (Non-Deposition)
2/5/2021	Rachel Steyer	0.2	\$750	\$150	call with CBM to discuss class member declarant	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/5/2021	Rachel Steyer	0.7	\$750	\$525	follow up call with class member declarant to discuss additional ADA questions	Class Outreach and Contact
2/5/2021	Rachel Steyer	1.5	\$750	\$1,125	reviewing documents in advance and preparation for depositions	Depositions
2/8/2021	Guy Wallace	2.7	\$1,350	\$3,645	revise and edit draft of Rule 30(b)(6) notice	Depositions
2/8/2021	Guy Wallace	0.9	\$1,350	\$1,215	com's with MTJ re Rule 30(b)(6) depo notice; ED depositions; D's production of documents and incompleteness of same; schedule on class certification	Discovery (Non-Deposition)
2/8/2021	Guy Wallace	0.9	\$1,350	\$1,215	com's with BBK; JY; AX; BU; MTJ; TCC; RLS re ED depositions; Rule 30(b)(6) depo notice; D's proposal to depose the named P's	Discovery (Non-Deposition)
2/8/2021	Mark Johnson	0.9	\$1,150	\$1,035	review draft 30b6 deposiiton notice and com w/ GBW re revisions to topic descriptions, assignment of topics to members of Plaintiffs' team	Depositions
2/8/2021	Mark Johnson	1.1	\$1,150	\$1,265	team zoom call re ED depositions, 30b6 depo topics and assignments; response to D's request for depositions of plaintiffs; communications with former EDs	Depositions
2/8/2021	Mark Johnson	0.2	\$1,150	\$230	follow up w/ GBW re scope of depo notice for 30b6 and timing of service, potential request for additonal 60 days to file class cert mtn based on delays in production.	Depositions
2/8/2021	Mark Johnson	0.6	\$1,150	\$690	draft email to OC for co-counsel consideration re request for depo dates for Plaintiffs	Depositions
2/8/2021	Mark Johnson	0.4	\$1,150	\$460	review and respond to memo from Edgar O re doc review assignments for ED depositions,	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/8/2021	Mark Johnson	0.7	\$1,150	\$805	review email and proposed contract revision from JND for review and coding of residency agreements; com w/ GBW re same (.2); compare w/ prior estimate; confer w/ TCC re testing sample of doc review for time spent and results and further com w/ GBW re same	Discovery (Non-Deposition)
2/8/2021	Mark Johnson	0.4	\$1,150	\$460	research DSS incident reports and prior emails from COC re client/class experiences w/ wait times and pendant systems.	Discovery (Non-Deposition)
2/8/2021	Mark Johnson	0.2	\$1,150	\$230	draft email to OC re meet and confer position on objections to producing pendant usage data or identifying systems, format and location of data; convey selection of facilities for interim agreement for searches.	Discovery (Non-Deposition)
2/8/2021	Mark Johnson	0.4	\$1,150	\$460	review spreadsheet analyses of latest production metadata and email tally's; coms /w RAB re same.	Discovery (Non-Deposition)
2/8/2021	Mark Johnson	1.8	\$1,150	\$2,070	review prior memos, reports, spreadsheets and other documents to prepare exemplar chart of Brookdale reports/spreadsheets and com w/ Brendan k re same	Discovery (Non-Deposition)
2/8/2021	Mark Johnson	0.2	\$1,150	\$230	email exchange w/ experts re /d's request for photos, ideas and practical concerns re same	Other Motions
2/8/2021	Mark Johnson	1.7	\$1,150	\$1,955	work on P section of draft joint ltr brief re production of expert photos and work product.	Other Motions
2/8/2021	Rachel Steyer	1.1	\$750	\$825	zoom meeting with MTJ, GBW, TCC, and co counsel from RBGG to discuss ongoing preparations for depositions, strategizing	Depositions
2/8/2021	Rachel Steyer	0.3	\$750	\$225	reviewing memo from JMP concerning summary of call pendant documents available in ESI	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/8/2021	Rachel Steyer	5.2	\$750	\$3,900	conducting document review in preparation/assistance for depositions and class certification: reviewed extensives email communications concerning staffing, looking for marketing materials	Discovery (Non-Deposition)
2/8/2021	Travis Close	0.2	\$850	\$170	Review/analyze "email action by custodian" analysis created by RAB	Case Organization, Planning and Strategy
2/8/2021	Travis Close	0.3	\$850	\$255	Review updated staffing position analysis by KES (co-counsel) for facility employees	Case Organization, Planning and Strategy
2/8/2021	Travis Close	0.3	\$850	\$255	Revise facility ownership memo before sending to co-counsel	Case Organization, Planning and Strategy
2/8/2021	Travis Close	0.2	\$850	\$170	Email to MTJ re: results of residency review speed test	Case Organization, Planning and Strategy
2/8/2021	Travis Close	0.2	\$850	\$170	Email to co-counsel re: facility ownership memo	Depositions
2/8/2021	Travis Close	1.1	\$850	\$935	team meeting re ED & 30(b)6 depositions and associated strategy	Discovery (Non-Deposition)
2/8/2021	Travis Close	0.9	\$850	\$765	timed residency agreement contract review -- # BKD0860918-BKD0861456 (1 -12 of 12) (999-1000, 1-10)	Discovery (Non-Deposition)
2/8/2021	Travis Close	0.4	\$850	\$340	Review/analyze analysis from JMP on call pendant usage at brookdale facilities & documentary evidence	Discovery (Non-Deposition)
2/8/2021	Travis Close	0.3	\$850	\$255	Analyze Def's letter re: request for photos taken during expert inspections	Experts (Including Retention)
2/9/2021	Guy Wallace	1.1	\$1,350	\$1,485	revise and edit draft Rule 30(b)(6) depo notice	Depositions
2/9/2021	Guy Wallace	0.6	\$1,350	\$810	review and analysis of emails from management re Service Alignment; com's with MTJ; RLS re same	Discovery (Non-Deposition)
2/9/2021	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ re D's motion to compel production of expert photographs	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/9/2021	Mark Johnson	0.8	\$1,150	\$920	calls w/ GBW (x2) re status of of doc analysis for ED depo exhibits, including discussion of "Dashboard" document; status and strategy on joint letter brief concerning production of expert photo and work product argument	Case Organization, Planning and Strategy
2/9/2021	Mark Johnson	1.7	\$1,150	\$1,955	continue drafting outline for ED depositions and review docs for same	Depositions
2/9/2021	Mark Johnson	0.1	\$1,150	\$115	email exchanges w/ RAB, AX re supplemental doc production for plaintiff and supp rog responses	Discovery (Non-Deposition)
2/9/2021	Mark Johnson	5.5	\$1,150	\$6,325	research, draft and finalized P section of joint discovery ltr re production of expert photos; email to TCC, GBW re same (.1)	Other Motions
2/9/2021	Rachel Steyer	6.0	\$750	\$4,500	reviewing culled emails on Relativity, adding relevant and important emails to corresponding depo prep lists and folders	Depositions
2/9/2021	Travis Close	0.4	\$850	\$340	Analyze email & docs s found by RLS showing centralized operations	Case Organization, Planning and Strategy
2/9/2021	Travis Close	0.3	\$850	\$255	Analyze service alignment dashboard example found by RLS	Case Organization, Planning and Strategy
2/9/2021	Travis Close	1.5	\$850	\$1,275	Research scope of expert disclosure privilege in regards to photographs taken by access experts	Case Organization, Planning and Strategy
2/9/2021	Travis Close	0.4	\$850	\$340	Meet w/ SLG re: strategy for upcoming depositions	Depositions
2/9/2021	Travis Close	0.8	\$850	\$680	Legal research re: scope of work product waiver and whether it applies in context of facility inspections re photos	Discovery (Non-Deposition)
2/10/2021	Guy Wallace	2.6	\$1,350	\$3,510	review and analysis of draft joint letter re D's demand for P's experts photographs; revise and edit same; com's with Waters; MTJ; TCC re same (.8)	Other Motions
2/10/2021	Mark Johnson	0.1	\$1,150	\$115	email to TCC re revision to master facility list	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/10/2021	Mark Johnson	0.8	\$1,150	\$920	work on ED depo outline	Depositions
2/10/2021	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re JND residency agreement review project	Discovery (Non-Deposition)
2/10/2021	Mark Johnson	0.2	\$1,150	\$230	email to Justin re follow up on pendant data reserch	Discovery (Non-Deposition)
2/10/2021	Mark Johnson	0.3	\$1,150	\$345	email exchanges w/ EPO re task time discoveries; review docs found	Discovery (Non-Deposition)
2/10/2021	Mark Johnson	0.7	\$1,150	\$805	coms w/ GBW re ltr brief re production of expert photos; revise and finalize same, coms w/ COC re further ediits; draft email to OC conveying ltr and conditional approval	Other Motions
2/10/2021	Rachel Steyer	7.1	\$750	\$5,325	ongoing document review and search for relevant and important documents and emails in preparation for depositions and class certification preparation	Depositions
2/10/2021	Travis Close	0.4	\$850	\$340	Call with JND, MTJ re: status of residency agreement contract review project	Case Organization, Planning and Strategy
2/10/2021	Travis Close	1.1	\$850	\$935	Edits/revisions to joint letter brief re: photographs taken by plaintiffs' access expert	Discovery (Non-Deposition)
2/11/2021	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ re discovery; deposition schedule; case schedule	Depositions
2/11/2021	Guy Wallace	0.7	\$1,350	\$945	com's with RLS re document analysis and preparation for ED depositions	Discovery (Non-Deposition)
2/11/2021	Guy Wallace	0.4	\$1,350	\$540	com's with Waters re preparation of reports re facility inspections	Experts (Including Retention)
2/11/2021	Mark Johnson	2.0	\$1,150	\$2,300	work on depo outlines	Depositions
2/11/2021	Rachel Steyer	0.9	\$750	\$675	phone call w/GBW to discuss depo prep	Depositions
2/11/2021	Rachel Steyer	4.8	\$750	\$3,600	reviewing emails in preparation for depositions and class certification	Depositions
2/11/2021	Travis Close	0.6	\$850	\$510	Meeting w/ JND contract reviewers on residency agreement review project	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/11/2021	Travis Close	0.3	\$850	\$255	Review further analysis by JMP re: call pendant systems at different brookdale facilities	Discovery (Non-Deposition)
2/12/2021	Guy Wallace	0.6	\$1,350	\$810	com's with GG re discovery needed for class certification	Class Certification
2/12/2021	Guy Wallace	1.3	\$1,350	\$1,755	revise and edit draft of Rule 30(b)(6) depo notice; com's with AX re same	Depositions
2/12/2021	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re deposition schedule and meet and confer efforts with Defendants re same	Depositions
2/12/2021	Mark Johnson	3.0	\$1,150	\$3,450	targed doc searches and analysis for class cert related docs	Class Certification
2/12/2021	Mark Johnson	0.1	\$1,150	\$115	com w/ client re status and napa CoronaVirus outbreak	Depositions
2/12/2021	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re status of document review	Discovery (Non-Deposition)
2/12/2021	Mark Johnson	0.3	\$1,150	\$345	memo to GBW re ongoing doc search and analysis projects	Discovery (Non-Deposition)
2/12/2021	Mark Johnson	0.9	\$1,150	\$1,035	zoom meeting w/ doc review team AX, TCC, Christopher, Brenda, Ryan	Discovery (Non-Deposition)
2/12/2021	Mark Johnson	0.7	\$1,150	\$805	draft emails (x3) to OC Maatman re depositio schedule, failure to produce personnell reports (with explanation and argument) and status of joint discvovery letter re expert photos	Discovery (Non-Deposition)
2/12/2021	Travis Close	1.0	\$850	\$850	meeting with team re: doc review (personnel report analysis, benchmarks, pendant data, labor detail reports, etc.)	Case Organization, Planning and Strategy
2/12/2021	Travis Close	0.4	\$850	\$340	Analyze instructions for contract review assignment	Discovery (Non-Deposition)
2/12/2021	Travis Close	0.2	\$850	\$170	Review/analyze filed section of joint letter brief re: expert photos	Discovery (Non-Deposition)
2/15/2021	Guy Wallace	1.6	\$1,350	\$2,160	preparation and drafting of Rule 30(b)(6) deposition notice	Depositions
2/16/2021	Guy Wallace	1.2	\$1,350	\$1,620	preparation and drafting of Rule 30(b)(6) depo notice	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/16/2021	Guy Wallace	1.2	\$1,350	\$1,620	com's with GG; JY; AX; MTJ re Rule 30(b)(6) notice and revisions thereto, and deposition schedule re same and ED's	Depositions
2/16/2021	Mark Johnson	0.3	\$1,150	\$345	zoom call w/ COC re 30b6 depo and ED depositions	Depositions
2/16/2021	Mark Johnson	1.4	\$1,150	\$1,610	revise and add to draft 30b6 depo notice, coms w/ GBW re same (.1)	Depositions
2/16/2021	Mark Johnson	0.1	\$1,150	\$115	email exchange w/ rab re status of latest doc production	Discovery (Non-Deposition)
2/16/2021	Mark Johnson	1.2	\$1,150	\$1,380	review sample of native docs from most recent document production	Discovery (Non-Deposition)
2/16/2021	Mark Johnson	1.0	\$1,150	\$1,150	review and draft response to OC email re combined depo scheduling of EDs and Plaintiffs, including explanation of reasons for not proceeding with Plaintiff depositions.	Discovery (Non-Deposition)
2/16/2021	Mark Johnson	3.5	\$1,150	\$4,025	draft section of joint discovery ltr re ED depo scheduling; research LR30-1 and FRCP 30(b)(1) for same; email to COC with comments on same and strategy (.1)	Other Motions
2/16/2021	Rachel Steyer	0.5	\$750	\$375	follow up call with class member declarant to discuss additional ADA questions	Class Outreach and Contact
2/16/2021	Rachel Steyer	2.8	\$750	\$2,100	conducted and completed intake with class member, created class member file, updated sharepoint	Class Outreach and Contact
2/16/2021	Rachel Steyer	0.3	\$750	\$225	weekly zoom meeting to discuss ongoing depo prep with SWCK and cocounsel	Depositions
2/16/2021	Travis Close	0.4	\$850	\$340	team meeting re: setting up depositions for EDs at defendant facilities	Case Organization, Planning and Strategy
2/16/2021	Travis Close	0.5	\$850	\$425	Update master facility chart with recently divested facilities	Case Organization, Planning and Strategy
2/16/2021	Travis Close	1.9	\$850	\$1,615	Analyze spreadsheets produced to find Business Unit numbers for all current and former facilities	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/17/2021	Guy Wallace	0.9	\$1,350	\$1,215	com's with MTJ re deposition schedule and meet and confer with D's re same	Depositions
2/17/2021	Guy Wallace	1.7	\$1,350	\$2,295	revise and edit draft of Rule 30(b)(6) depo notice; com's with MTJ re same (.5)	Depositions
2/17/2021	Guy Wallace	0.4	\$1,350	\$540	review and analysis of D's MTC re photographs; com's with MTJ re responsive points	Discovery (Non-Deposition)
2/17/2021	Mark Johnson	0.5	\$1,150	\$575	zoom mtg w/ coc GBW, RS, TCC, BB, JY, AX re depo scheduling or plaintiffs and EDs and strategy for response to OC re same, availaibilty and limitratrions of clients for depostiion,	Depositions
2/17/2021	Mark Johnson	0.4	\$1,150	\$460	review and draft resonse to OC Maatman email re depositions of clients and EDs.	Depositions
2/17/2021	Mark Johnson	0.3	\$1,150	\$345	call w/ Amy xu re subpoena for pendant system vendors	Discovery (Non-Deposition)
2/17/2021	Mark Johnson	0.5	\$1,150	\$575	call w/ gbw re strategy for responding to OC changes in draft joint discovery ltr re expert photos.	Other Motions
2/17/2021	Mark Johnson	0.1	\$1,150	\$115	review and analyze OC changes to draft joint discovery ltr re expert photos,.	Other Motions
2/17/2021	Rachel Steyer	0.7	\$750	\$525	docuemnt review for relevant records for likely class member declarant	Class Certification
2/17/2021	Rachel Steyer	0.6	\$750	\$450	zoom meeting to discuss communications with opposing counsel regarding depo notices and scheduling	Depositions
2/17/2021	Travis Close	0.6	\$850	\$510	Investigate recent change of ownership at Fountaingrove facility	Case Organization, Planning and Strategy
2/17/2021	Travis Close	0.6	\$850	\$510	Team meeting re: sheduling depositions and compromise wh defendants	Depositions
2/17/2021	Travis Close	1.9	\$850	\$1,615	Update master facility spreadsheet with DSS faciliy number, licensee number, and transition date of former Brookdale facilities	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/17/2021	Travis Close	0.9	\$850	\$765	Review/analyze docs on Adaline Kiehn for contact info (subpoena/deposition)	Discovery (Non-Deposition)
2/18/2021	Guy Wallace	2.3	\$1,350	\$3,105	revise and edit draft Rule 30(b)(6) depo notice; com's with co-counsel re same and re assigned subject areas	Depositions
2/18/2021	Guy Wallace	0.9	\$1,350	\$1,215	com's with MTJ re response to D's MTC re expert photographs; depositions of individual Brookdale officials including divisional and regional officers; Rule 30(b)(6) notice	Discovery (Non-Deposition)
2/18/2021	Mark Johnson	0.7	\$1,150	\$805	further review and revision to draft 30(b)(6) depo to finalize same; call & emails w/ GBW re same.	Depositions
2/18/2021	Mark Johnson	0.2	\$1,150	\$230	emails w/ OC and COC re depositions of Plaintiffs and meeting and conferring re same	Discovery (Non-Deposition)
2/18/2021	Mark Johnson	0.2	\$1,150	\$230	emails w/ staff re investigation for contact information for former Brookdale employees for depo subpoenas.	Discovery (Non-Deposition)
2/18/2021	Mark Johnson	3.4	\$1,150	\$3,910	re-work P section of draft joint discovery ltr re expert photo production, research for same	Other Motions
2/18/2021	Rachel Steyer	0.3	\$750	\$225	received call from family friend/lawyer of former Brookdale resident, interested in setting up intake call	Class Outreach and Contact
2/18/2021	Travis Close	0.3	\$850	\$255	Review/analyze emails found by RLS showing centralized control over staffing	Case Organization, Planning and Strategy
2/18/2021	Travis Close	1.2	\$850	\$1,020	Review/analyze docs hosted under custodian Adaline Kiehn for depo prep	Depositions
2/18/2021	Travis Close	1.1	\$850	\$935	Analysis into all inspection dates on record where def's exper blacksmith was present	Discovery (Non-Deposition)
2/18/2021	Travis Close	0.8	\$850	\$680	Analyze record of docs produced for Mae Lockheart (Tracy) as potential new plaintiff	Discovery (Non-Deposition)
2/18/2021	Travis Close	0.8	\$850	\$680	Review/analyze recent productions for depo prep -- ADA w/20 wheelchair	Discovery (Non-Deposition)
2/18/2021	Travis Close	0.7	\$850	\$595	Review/analyze recent productions for depo prep -- ADA w/10 accessibl*	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/18/2021	Travis Close	1.3	\$850	\$1,105	Continue drafting demand letter to City of San Diego	Discovery (Non-Deposition)
2/18/2021	Travis Close	0.4	\$850	\$340	Legal research re: how to respond to refusal to accept service of subpoena	Discovery (Non-Deposition)
2/19/2021	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ; TCC re depositions; D's production of information re Brookdale task times	Discovery (Non-Deposition)
2/19/2021	Mark Johnson	1.8	\$1,150	\$2,070	doc review team meeting re ongoing doc review, targeted projects, doc review for ED depositions and 30 b 6 depo	Case Organization, Planning and Strategy
2/19/2021	Mark Johnson	1.4	\$1,150	\$1,610	review docs re service alignment, norms in document production for depositions	Case Organization, Planning and Strategy
2/19/2021	Mark Johnson	0.1	\$1,150	\$115	call w/ GBW re joint ltr on expert photos, docs for depositions	Discovery (Non-Deposition)
2/19/2021	Mark Johnson	0.8	\$1,150	\$920	revise, proof, cite check discovery ltr re expert photographs; email cover to OC with same	Other Motions
2/19/2021	Rachel Steyer	1.4	\$750	\$1,050	conducted partial intake w/class member, created client folder, updated sharepoint	Class Outreach and Contact
2/19/2021	Rachel Steyer	2.1	\$750	\$1,575	finished reading and reviewing depo transcript of ED from Sunrise case as part of ongoing depo prep	Depositions
2/19/2021	Rachel Steyer	1.0	\$750	\$750	reading and reviewing Sunrise ED depo transcript in preparation for depositions	Depositions
2/19/2021	Rachel Steyer	0.7	\$750	\$525	reviewing email and relevant Brookdale attachments from TCC regarding Brookdale norms and services	Depositions
2/19/2021	Rachel Steyer	1.8	\$750	\$1,350	meeting with cocounsel and SW team working on document review and discussing project assignments	Discovery (Non-Deposition)
2/19/2021	Rachel Steyer	0.2	\$750	\$150	reviewing email from JMP concerning Brookdale issue registers and corresponding documents	Discovery (Non-Deposition)
2/19/2021	Travis Close	0.4	\$850	\$340	Email to MTJ re: concerns about demand letter to san diego for refusal to accept service of subpoena	Case Organization, Planning and Strategy
2/19/2021	Travis Close	1.7	\$850	\$1,445	weekly doc review meeting with MTJ, GBW, and RBGG co-counsel (30(b)(6) notice,	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/19/2021	Travis Close	0.9	\$850	\$765	Analysis on Brookdale Norms, and relationship to SA benchmarks, articulated to team and co-counsel	Discovery (Non-Deposition)
2/19/2021	Travis Close	1.9	\$850	\$1,615	Continue drafting demand letter to City of San Diego re: failure to respond to document subpoena	Discovery (Non-Deposition)
2/21/2021	Mark Johnson	1.2	\$1,150	\$1,380	draft email responses to OC re ED deposition dates, notices, meeting and conferring re Plaintiff depositions, justification for seeking supplemental class list; emails to /COC re input re same	Discovery (Non-Deposition)
2/22/2021	Guy Wallace	0.8	\$1,350	\$1,080	com's with Thornton; MTJ re D's production of data; documents not yet produced; schedule	Discovery (Non-Deposition)
2/22/2021	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re ED depo notice, possible document requests.	Case Organization, Planning and Strategy
2/22/2021	Mark Johnson	0.4	\$1,150	\$460	call w/ R Stiner re deposition of Stacy, logistics and obtaining text data.	Depositions
2/22/2021	Mark Johnson	0.8	\$1,150	\$920	review, revise draft depo notices for EDs, (4); serve OC	Depositions
2/22/2021	Mark Johnson	0.2	\$1,150	\$230	finalize and send emails to OC re ED depositions, Plaintiffs depositions, request for supplemental production of class list	Discovery (Non-Deposition)
2/22/2021	Mark Johnson	0.7	\$1,150	\$805	review and draft response to OC email response re production of personnel reports, including rebuttal to arguments that issue not raised, available from DSS, and will receive from ESI production	Discovery (Non-Deposition)
2/22/2021	Mark Johnson	2.0	\$1,150	\$2,300	review doc production in relativity re "community customization"; review natives from most recent production to norms or task times	Discovery (Non-Deposition)
2/22/2021	Mark Johnson	0.4	\$1,150	\$460	email exchanges w/ Thornton and Marks re issues with move-out data integration with assessment data; review examples; email OC re addressing same.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/22/2021	Mark Johnson	0.6	\$1,150	\$690	call w/ GBW re outstanding discovery, status of meet and confer efforts, potential motions to compel; strategy for seeking extension of time to file class cert motion,.	Discovery (Non-Deposition)
2/22/2021	Travis Close	0.5	\$850	\$425	Email to team re: community-level reports on resident revenue and community fees	Case Organization, Planning and Strategy
2/22/2021	Travis Close	0.3	\$850	\$255	Analyze outline by AX filling in responsibility for 30(b)(6) depo topics	Depositions
2/22/2021	Travis Close	0.2	\$850	\$170	Email to AX re: pendant call subpoenas and research	Discovery (Non-Deposition)
2/22/2021	Travis Close	1.4	\$850	\$1,190	Review/analyze spreadsheets for evidence of resident revenue paid & community fees	Discovery (Non-Deposition)
2/22/2021	Travis Close	0.3	\$850	\$255	Analyze spreadsheet shared by JMP showing renovations/alterations to facilities	Discovery (Non-Deposition)
2/22/2021	Travis Close	0.3	\$850	\$255	Review findings from JMP on issue register spreadsheets	Discovery (Non-Deposition)
2/22/2021	Travis Close	0.2	\$850	\$170	Email to KM re: fixing issue of multiple residency agreements in a document	Discovery (Non-Deposition)
2/22/2021	Travis Close	1.1	\$850	\$935	Depo prep -- ADA docs (ADA w/10 walker) # BKD1828564-BKD1970640 (1-56 of 56)	Discovery (Non-Deposition)
2/23/2021	Guy Wallace	0.8	\$1,350	\$1,080	com's with MTJ re D's production of materials re Brookdale norms, task times, "community customization", volume of Brookdale production since January 2021; impact on preparation for depositions and class cert schedule	Discovery (Non-Deposition)
2/23/2021	Mark Johnson	0.1	\$1,150	\$115	call w/ client re depo scheduling and logistics and D response to requests for repairs.and access barriers	Depositions
2/23/2021	Mark Johnson	0.6	\$1,150	\$690	call w/ SD City attorney's office re intervention on compliance with document subpoena re construction docs for 2 BK facilities; follow up emails re same.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/23/2021	Mark Johnson	0.6	\$1,150	\$690	coms (x2) w/ GBW re results of review of recent doc production; strategy for seeking additional time for class cert motion based on late doc production.	Discovery (Non-Deposition)
2/23/2021	Mark Johnson	6.5	\$1,150	\$7,475	targeted doc review of recent two document productions; draft emails and memos to COC and file re same	Discovery (Non-Deposition)
2/23/2021	Travis Close	0.4	\$850	\$340	Edits to List of Key Facts for Class certification	Class Certification
2/23/2021	Travis Close	0.5	\$850	\$425	Depo prep -- continue review/analysis for Transportation/accessibility docs	Discovery (Non-Deposition)
2/24/2021	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ re D's document production since January 2021 and scope and volume thereof; schedule on class certification; analysis of Residency Agreements	Discovery (Non-Deposition)
2/24/2021	Mark Johnson	0.1	\$1,150	\$115	com w/ COC AX re Plaintiff depositions	Depositions
2/24/2021	Mark Johnson	0.4	\$1,150	\$460	coms w/ GBW and RAB re interim results of residency agreement review.	Discovery (Non-Deposition)
2/24/2021	Mark Johnson	0.2	\$1,150	\$230	review cover for new document production and com w/ G=RAB re same, update doc production spreadsheet, com w/ GBW re same	Discovery (Non-Deposition)
2/24/2021	Mark Johnson	0.3	\$1,150	\$345	draft email/memo to doc review team re reports identified in doc production and collection, categorization of same	Discovery (Non-Deposition)
2/24/2021	Mark Johnson	5.8	\$1,150	\$6,670	continue targeted review of docs for use in depositions on specific subject areas and collect / organize same	Discovery (Non-Deposition)
2/24/2021	Mark Johnson	0.3	\$1,150	\$345	set up share files for docs resulting from review of latest productions and com w/ COC re same.	Discovery (Non-Deposition)
2/24/2021	Travis Close	0.4	\$850	\$340	Review/analyze CAPS reports shared by RAB	Case Organization, Planning and Strategy
2/24/2021	Travis Close	1.1	\$850	\$935	Analyze hits on "community customization guides" in Relativity for determining SA benchmarks	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/24/2021	Travis Close	0.5	\$850	\$425	Modify List of Key Facts with info re: newly constructed facilities and plaintiff resident agreements	Case Organization, Planning and Strategy
2/24/2021	Travis Close	0.2	\$850	\$170	Analyze residency agreement on file for Stacia Stiner	Case Organization, Planning and Strategy
2/24/2021	Travis Close	0.2	\$850	\$170	Analyze residency agreement on file for Helen Carlson	Case Organization, Planning and Strategy
2/24/2021	Travis Close	0.2	\$850	\$170	Analyze residency agreement on file for Lawrence Quinlan	Case Organization, Planning and Strategy
2/24/2021	Travis Close	0.5	\$850	\$425	Analyze def's discovery responses on number of facilities newly constructed and altered	Class Certification
2/24/2021	Travis Close	0.5	\$850	\$425	Search/analyze emails produced by Defendants about Lawrence Quinlan and supposed refusal of care	Class Certification
2/24/2021	Travis Close	0.4	\$850	\$340	Review/analyze 2019 annual report of Brookdale Senior Living for revenue, profits, and general ability to pay	Class Outreach and Contact
2/24/2021	Travis Close	0.6	\$850	\$510	Analyze "community customization" guides shared by MTJ for calculating SA benchmarks	Discovery (Non-Deposition)
2/25/2021	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ re scope of D's document production and remainder of same; depositions of Plaintiffs; schedule for class cert motion; meet and confer efforts re same	Discovery (Non-Deposition)
2/25/2021	Mark Johnson	0.3	\$1,150	\$345	follow up call with A Xu and TCC re resultss of meet and confer re P depos; preparing ltr brief	Case Organization, Planning and Strategy
2/25/2021	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW re outstanding discovery disputes and factual basis / strategy for seeking extension of time to file class cert motion.	Case Organization, Planning and Strategy
2/25/2021	Mark Johnson	1.0	\$1,150	\$1,150	draft response to MJacobsent email re production of personnel, reports, rebuttal to multiple points and decription of incomplete nature of production based on review of same.	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/25/2021	Mark Johnson	0.6	\$1,150	\$690	email and call w/ K Stilber re review and analysis of doc production of Personnel reports.	Discovery (Non-Deposition)
2/25/2021	Mark Johnson	1.0	\$1,150	\$1,150	telephonic meet and confer w/ OC re Plaintiff depo scheduling	Discovery (Non-Deposition)
2/25/2021	Mark Johnson	3.7	\$1,150	\$4,255	review and analyze document production of potential personnell reports/ track by facility and DSS v. BKD production for response to Ds re same	Discovery (Non-Deposition)
2/25/2021	Mark Johnson	1.5	\$1,150	\$1,725	scan production of 2/24 for new doc re task times, norms, other key terms	Discovery (Non-Deposition)
2/25/2021	Travis Close	0.3	\$850	\$255	Call with MTJ, AX debriefing after M/C with defendants	Case Organization, Planning and Strategy
2/25/2021	Travis Close	0.4	\$850	\$340	Review and analyze memo by EPO summarizing training documents produced	Case Organization, Planning and Strategy
2/25/2021	Travis Close	0.3	\$850	\$255	Review/revise MTJ's draft response to Defendants re: personnel reports	Case Organization, Planning and Strategy
2/25/2021	Travis Close	0.8	\$850	\$680	M/C call with Defendants re: when to schedule Ps' depositions	Communications With Opposing Counsel
2/25/2021	Travis Close	0.6	\$850	\$510	Review and analyze Real Estate Deep Dive, showing revenue projections, occupancy and turner at BKD facilities	Discovery (Non-Deposition)
2/25/2021	Travis Close	0.3	\$850	\$255	Review analysis from KS (co-counsel) on pendant data and new metadata produced	Discovery (Non-Deposition)
2/25/2021	Travis Close	0.9	\$850	\$765	Continue drafting motion for protective order re: plaintiffs' depositions	Discovery (Non-Deposition)
2/25/2021	Travis Close	1.5	\$850	\$1,275	Legal research re: standard for issuing protective order under Rule 26	Other Motions
2/25/2021	Travis Close	1.3	\$850	\$1,105	Begin drafting joint letter brief re: protective order to prevent Ps from being deposed before class cert	Other Motions
2/25/2021	Travis Close	1.3	\$850	\$1,105	Legal research re: instances where protective order for deposition was granted	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/26/2021	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re D's recent productions of documents and need for change in class cert schedule	Discovery (Non-Deposition)
2/26/2021	Mark Johnson	1.5	\$1,150	\$1,725	mtg of document review and analysis team - reports on progress, discussion of strategy and assignments.	Case Organization, Planning and Strategy
2/26/2021	Mark Johnson	0.2	\$1,150	\$230	email to OC seeking proposed depo dates for additional witnesses, review email tally's to confirm choices.	Depositions
2/26/2021	Mark Johnson	0.8	\$1,150	\$920	research move-in/move out data, facility capacities and original production of class member contacts a background for arguments iso request for full list of current clas membbbers.	Discovery (Non-Deposition)
2/26/2021	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW re ED depositions, review of T Ward docs, P depositions, strategy for meeting and conferring and seeking extension of class cert deadline, facts in support of same	Other Motions
2/26/2021	Mark Johnson	1.6	\$1,150	\$1,840	draft correspondence to OC seeking to meet and confer re modification of schedule for class cert. describing factual support for same; research document production history and stats for support for same	Other Motions
2/26/2021	Travis Close	1.6	\$850	\$1,360	weekly doc review meeting with team & co-counsel re: service alignment findings, budget, call pendant data, etc	Case Organization, Planning and Strategy
2/26/2021	Travis Close	0.4	\$850	\$340	Review/analyze findings by BK re: billing detail for revenue reports	Case Organization, Planning and Strategy
2/26/2021	Travis Close	0.3	\$850	\$255	Email to BFK re: instructions for assignment documenting and summarizing all billing detail by revenue reports	Case Organization, Planning and Strategy
2/26/2021	Travis Close	0.2	\$850	\$170	Email to Titan re: intro to co-counsel for sending additional subpoenas	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/26/2021	Travis Close	1.5	\$850	\$1,275	Continue drafting Ps portion of joint letter brief re: named Plaintiff depositions	Other Motions
2/26/2021	Travis Close	1.6	\$850	\$1,360	Continue drafting joint letter brief re: protective order for named plaintiff depositions (argument)	Other Motions
2/28/2021	Mark Johnson	0.2	\$1,150	\$230	review email covers for document production, calculate pages and percentage of recent production over past productions; email COC re same.	Discovery (Non-Deposition)
2/28/2021	Rachel Steyer	0.2	\$750	\$150	email response to CBM regarding contact with class member declarants and status of draft	Class Outreach and Contact
3/1/2021	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ re D's further production of documents and impact on class cert schedule and stipulation re same	Discovery (Non-Deposition)
3/1/2021	Mark Johnson	5.8	\$1,150	\$6,670	review docs in relativity and work on ED outline and notes; save potential exhibits.	Depositions
3/1/2021	Mark Johnson	0.3	\$1,150	\$345	draft email to OC re production of class list	Discovery (Non-Deposition)
3/1/2021	Mark Johnson	0.2	\$1,150	\$230	review TCC draft of joint letter brief re P depos	Other Motions
3/1/2021	Travis Close	1.2	\$850	\$1,020	Continue drafting section of joint letter brief on named plaintiffs' depositions (argument, conclusion)	Case Organization, Planning and Strategy
3/1/2021	Travis Close	1.5	\$850	\$1,275	Legal research re: ninth circuit cases where protective order was granted	Case Organization, Planning and Strategy
3/1/2021	Travis Close	0.5	\$850	\$425	Review and analyze summary of Brookdale Q4 earnings call	Case Organization, Planning and Strategy
3/1/2021	Travis Close	0.2	\$850	\$170	Email to team sharing draft section of joint letter brief on plaintiff depositions	Depositions
3/1/2021	Travis Close	1.6	\$850	\$1,360	Finish drafting & revising section of joint letter brief on named plaintiffs' depositions	Other Motions
3/1/2021	Travis Close	0.3	\$850	\$255	Review findings/memo by AX re: substitution of parties legal research	Other Motions
3/2/2021	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re discovery and D's proposal re class list; categories of documents not yet produced	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/2/2021	Mark Johnson	1.0	\$1,150	\$1,150	call w/ GBW to discuss status of document production and missing categories of information, reports, motions to compel, proposed extension of time for class cert motion.	Case Organization, Planning and Strategy
3/2/2021	Mark Johnson	0.4	\$1,150	\$460	review emails from D Marks and attachments re move-out data, analysis of resident tenures and number of residents with mobility disabilities. respond re same	Case Organization, Planning and Strategy
3/2/2021	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW re potential motions to compel, request for clas list supplement, outstanding discovery.	Discovery (Non-Deposition)
3/2/2021	Mark Johnson	0.3	\$1,150	\$345	call w/ Karen Stilber re analysis of CDSS personnel report production	Discovery (Non-Deposition)
3/2/2021	Mark Johnson	0.2	\$1,150	\$230	review and analyze email from OC re personnel report production and draft email to K Stilber re follow up on same	Discovery (Non-Deposition)
3/2/2021	Mark Johnson	0.5	\$1,150	\$575	draft email to OC responding to position on production of DSS personnel reports	Discovery (Non-Deposition)
3/2/2021	Mark Johnson	1.5	\$1,150	\$1,725	review and analyze list of facilities for which at least one DSS personnel report was produced, compare to master list, create list of facilities for which no report was produced, reconcile discrepancies.	Discovery (Non-Deposition)
3/2/2021	Mark Johnson	0.2	\$1,150	\$230	review and draft response to email from OC re position on supplemental class list production	Discovery (Non-Deposition)
3/2/2021	Mark Johnson	0.2	\$1,150	\$230	email exchanges w/ RAB re status of uploading latest document production, ability to identify ESI v other docs produced	Discovery (Non-Deposition)
3/2/2021	Mark Johnson	0.1	\$1,150	\$115	draft emails to OC re completion of production of docs, production of more recent policy and procedure manuals.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/2/2021	Mark Johnson	0.4	\$1,150	\$460	review OC response to email re need for residentID to integrate move-in data with assessment data; review prior productions and draft inquiry re inclusion of PSP data in prior production	Discovery (Non-Deposition)
3/2/2021	Mark Johnson	1.2	\$1,150	\$1,380	work on revisions to draft joint ltr seeking protective order on Ps depositions; confer w/ COC re same and review redlines from COC	Other Motions
3/2/2021	Mark Johnson	0.6	\$1,150	\$690	call w/ Gay G and Amy X re strategy and procedure and timing for filing papers for substitution of plaintiffs (.5); com w/ GBW re same (.1)	Other Motions
3/2/2021	Travis Close	0.5	\$850	\$425	Analyze docs collected so far on E:\ drive related to community customizations	Case Organization, Planning and Strategy
3/2/2021	Travis Close	0.4	\$850	\$340	Review analysis of personnel reports by facility from KS	Case Organization, Planning and Strategy
3/2/2021	Travis Close	1.4	\$850	\$1,190	Search records/production for potential new plaintiffs -- results for Loyd Fugil, Eva Rossman, and Judith Gerber	Case Organization, Planning and Strategy
3/2/2021	Travis Close	1.6	\$850	\$1,360	Review and Ogranize community customizations worksheet producted to date -- # BKD1868918-BKD2279314 (1-35 of 35)	Discovery (Non-Deposition)
3/2/2021	Travis Close	1.2	\$850	\$1,020	Depo prep -- review of custodian Ferdinand Augustus Buot -- "complain*" -- BKD1764872-BKD1894221 (1-25 of 178)	Discovery (Non-Deposition)
3/3/2021	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of com from Maatman re class cert schedule; com's with MTJ re same	Class Certification
3/3/2021	Guy Wallace	0.4	\$1,350	\$540	com's with GG; MTJ re schedule on class certification and relief re same and meet and confer efforts with Maatman	Class Certification
3/3/2021	Guy Wallace	0.4	\$1,350	\$540	com's with TCC re documents needed for ED depositions	Depositions
3/3/2021	Guy Wallace	0.6	\$1,350	\$810	com's with documents needed for ED depositions	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/3/2021	Guy Wallace	1.7	\$1,350	\$2,295	review and analysis of exhibits for ED depositions	Depositions
3/3/2021	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ; Bonner re D's recent document production and remaining categories that have not been produced	Discovery (Non-Deposition)
3/3/2021	Mark Johnson	6.0	\$1,150	\$6,900	review recent document production with targeted searches for service alignment docs, training, policy and procedure manuals	Case Organization, Planning and Strategy
3/3/2021	Rachel Steyer	5.4	\$750	\$4,050	reviewing documents and discovery, updating information into respective categories in internal document assembling facts and docs for class certificaion	Class Certification
3/3/2021	Travis Close	0.4	\$850	\$340	Review and analyze MTJ edits to draft subpoena and attachments re: call pendant data	Case Organization, Planning and Strategy
3/3/2021	Travis Close	0.7	\$850	\$595	Edits to List of Key Facts for class certification	Class Certification
3/3/2021	Travis Close	0.2	\$850	\$170	Email to GBW re: sharing list of key facts	Class Certification
3/3/2021	Travis Close	0.3	\$850	\$255	Review updated analysis by KS re facilities for at least one personnel report, and for no report, during class period	Discovery (Non-Deposition)
3/3/2021	Travis Close	1.1	\$850	\$935	Depo prep -- review of custodian Ferdinand Augustus Buot -- "complain*" -- BBKD1894221-BKD1896158 (25-41 of 178)	Discovery (Non-Deposition)
3/3/2021	Travis Close	1.7	\$850	\$1,445	Joint letter brief legal research -- how often have protective ordres been granted for covid-related reasons	Other Motions
3/3/2021	Travis Close	0.2	\$850	\$170	Call with GBW re: continuing analysis of list of key facts	Pleadings and Motions Re: Pleadings
3/4/2021	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ re preparation for meet and confer with D's re discovery and class cert schedule; analysis of results of same; preparation of request for conference with MJ Beeler	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/4/2021	Guy Wallace	0.5	\$1,350	\$675	tc with Jacobsen; Reilly; MTJ re stipulation re schedule on class certification	Class Certification
3/4/2021	Guy Wallace	3.7	\$1,350	\$4,995	review and analysis of documents for ED depo preparation	Depositions
3/4/2021	Guy Wallace	0.9	\$1,350	\$1,215	tc with MTJ re documents for ED depos	Depositions
3/4/2021	Mark Johnson	1.3	\$1,150	\$1,495	review email from COC re modification of schedule; calls (x2) w/ GBW re strategy for same (.9), call w/ GBW and GCG re same (.3)	Case Organization, Planning and Strategy
3/4/2021	Mark Johnson	0.5	\$1,150	\$575	meet and confer w/ OC re class cert schedule	Case Organization, Planning and Strategy
3/4/2021	Mark Johnson	0.3	\$1,150	\$345	call with client BJ-H re co-resident situation	Class Outreach and Contact
3/4/2021	Mark Johnson	1.0	\$1,150	\$1,150	call w/ GBW re ED depos and review/discuss docs for depos	Depositions
3/4/2021	Mark Johnson	3.0	\$1,150	\$3,450	doc review and searwches for depos	Depositions
3/4/2021	Mark Johnson	3.5	\$1,150	\$4,025	draft request for discovery status confernce and backgroud and support for same	Discovery (Non-Deposition)
3/4/2021	Rachel Steyer	1.2	\$750	\$900	condcuting research to evaluate current/former/pending litigation filed by liekly putative class members against defendant	Class Certification
3/4/2021	Travis Close	1.4	\$850	\$1,190	Investigate diminished access to senior living communities due to COVID restrictions	Case Organization, Planning and Strategy
3/4/2021	Travis Close	1.0	\$850	\$850	Continue drafting doc outline for Theresa Ward ED deposition	Case Organization, Planning and Strategy
3/4/2021	Travis Close	1.5	\$850	\$1,275	Analyze residency agreement contract review by JND into spreadsheet	Class Certification
3/4/2021	Travis Close	0.5	\$850	\$425	Begin drafting outline for theresa ward ED deposition	Depositions
3/4/2021	Travis Close	1.4	\$850	\$1,190	Continue drafting doc outline for Theresa Ward ED deposition	Depositions
3/5/2021	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of documents for ED depo prep	Depositions
3/5/2021	Guy Wallace	1.4	\$1,350	\$1,890	com's with MTJ; TCC; RLS re exhibits for ED Depos	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/5/2021	Guy Wallace	5.3	\$1,350	\$7,155	preparation of topics; questions and exhibits for ED Depos	Depositions
3/5/2021	Mark Johnson	0.4	\$1,150	\$460	call w TCC re depo planning for ED depos and categories of relevant documents to be gathered as potential exhibits	Depositions
3/5/2021	Rachel Steyer	0.8	\$750	\$600	conducted legal research to determine extent of similar claims filed against tdefendant by class members	Class Certification
3/5/2021	Rachel Steyer	0.3	\$750	\$225	extracting and preparing additioanl exhibits per GBW request in preparation for depositions	Depositions
3/5/2021	Rachel Steyer	5.9	\$750	\$4,425	document review in search of specific list of key docs as requested by GBW in preparation for ED depos; saving other relevant docs	Depositions
3/5/2021	Travis Close	0.2	\$850	\$170	Email to GBW re: ED depo outline completed thus far	Depositions
3/5/2021	Travis Close	0.4	\$850	\$340	Call with MTJ re: deposition outlines for upcoming ED depos	Depositions
3/5/2021	Travis Close	1.7	\$850	\$1,445	Continue drafting document outline for theresa ward depo (sample DSS citations and floor plans)	Depositions
3/5/2021	Travis Close	1.4	\$850	\$1,190	Review, analyze, and organize ED Orientation/training materials	Depositions
3/5/2021	Travis Close	0.8	\$850	\$680	Review/analyze complaints and complaint forms on Brookdale website and in doc productions	Depositions
3/5/2021	Travis Close	0.2	\$850	\$170	Call with GBW re: materials needed for ED depositions	Depositions
3/5/2021	Travis Close	0.4	\$850	\$340	Email to team re: ED microsite learning materials	Depositions
3/5/2021	Travis Close	0.2	\$850	\$170	Emails to team re: ED orientation materials	Depositions
3/5/2021	Travis Close	0.2	\$850	\$170	Call with AX re: serving document subpoenas on call pendant systems companies	Discovery (Non-Deposition)
3/5/2021	Travis Close	1.3	\$850	\$1,105	Depo prep -- further review of ED Orientation materials	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/7/2021	Guy Wallace	2.6	\$1,350	\$3,510	preparation of topics, questions and exhibits re ED depos	Depositions
3/7/2021	Mark Johnson	0.2	\$1,150	\$230	draft email to COC describing new production of spreadsheets with norms and benchmark informaiton	Case Organization, Planning and Strategy
3/7/2021	Mark Johnson	0.2	\$1,150	\$230	review and send to GBW with description the training materials re Acuity reports 101	Depositions
3/7/2021	Mark Johnson	0.8	\$1,150	\$920	review and analyze new production of spreadsheet containing norm and benchmark data	Discovery (Non-Deposition)
3/7/2021	Mark Johnson	0.1	\$1,150	\$115	email exchanges w/ RAB re new production from Ds	Discovery (Non-Deposition)
3/8/2021	Guy Wallace	0.5	\$1,350	\$675	com's with Defendants; MTJ re discovery and schedule re class certification	Class Certification
3/8/2021	Guy Wallace	2.6	\$1,350	\$3,510	preparation of topics, questions and exhibits for ED depos	Depositions
3/8/2021	Guy Wallace	0.4	\$1,350	\$540	review and analysis of D's answers to Carlson Interrogatories; com's with MTJ re same and M&C re same	Discovery (Non-Deposition)
3/8/2021	Mark Johnson	0.4	\$1,150	\$460	review and analyze D's response to Carlson interrogatories	Discovery (Non-Deposition)
3/8/2021	Mark Johnson	0.2	\$1,150	\$230	email to/from GBW re rog responses; draft remail to OC requesting meet and confer re same.	Discovery (Non-Deposition)
3/8/2021	Mark Johnson	4.5	\$1,150	\$5,175	draft, revise brief iso request for discovery case managment conference	Other Motions
3/8/2021	Mark Johnson	0.4	\$1,150	\$460	review Ds revisions to joint ltr re expert photos; com w/ GBW re same, make formatting changes and send to OC with cover	Other Motions
3/8/2021	Mark Johnson	1.0	\$1,150	\$1,150	review proposed stip from D re modification of class cert deadline; com w/ GBW re same; draft email response	Other Motions
3/8/2021	Travis Close	0.3	\$850	\$255	review/analyze final edits made to joint letter brief re: expert photographs	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/8/2021	Travis Close	0.9	\$850	\$765	Analyze for which categories of docs we have completed and not yet completed for upcoming Quinlan depo	Depositions
3/8/2021	Travis Close	0.3	\$850	\$255	Email to RLS re: planning reminder of doc collection for Theresa Ward depo	Depositions
3/8/2021	Travis Close	1.5	\$850	\$1,275	Depo prep -- review and analyze "brookdale associate foundations" training materials	Depositions
3/8/2021	Travis Close	0.4	\$850	\$340	Analyze findings by RLS re: CMIP network/ED bonus	Discovery (Non-Deposition)
3/8/2021	Travis Close	1.4	\$850	\$1,190	Review lawrence quinlan's file and analyze for instances of complaints recorded	Discovery (Non-Deposition)
3/9/2021	Guy Wallace	3.9	\$1,350	\$5,265	review and analysis of draft request for discovery CMC with MJ Beeler; revise and edit same; com's with MTJ re same (.5)	Case Management Conferences
3/9/2021	Guy Wallace	1.6	\$1,350	\$2,160	preparation of topics, questions and exhibits for ED depositions; com's with TCC and RLS re same	Depositions
3/9/2021	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ re meet and confer with D's re refusal to response to more than 25 interrogatories; legal research and analysis re same	Discovery (Non-Deposition)
3/9/2021	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ re revised version of request for discovery CMC with MJ Beeler; analysis of D's recent production of documents	Discovery (Non-Deposition)
3/9/2021	Mark Johnson	0.7	\$1,150	\$805	calls (x2) w/ GBW re revised request for case management conference re discovery and amending schedule	Case Organization, Planning and Strategy
3/9/2021	Mark Johnson	1.4	\$1,150	\$1,610	coms w/ RAB re metadata reports and analyze same for examples of late produced docs;	Case Organization, Planning and Strategy
3/9/2021	Mark Johnson	0.1	\$1,150	\$115	review email from OC re meeting and conferring on rogs; email to COC re same	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/9/2021	Mark Johnson	0.3	\$1,150	\$345	upload spreadsheets with norms and other information to shared file;draft email to COC/experts re same, describing files and posing questions,	Discovery (Non-Deposition)
3/9/2021	Mark Johnson	1.3	\$1,150	\$1,495	telephonic meet and confer w/ OC Jacobsen and Vick re D's objections to Carlson interrogatories.	Discovery (Non-Deposition)
3/9/2021	Mark Johnson	1.1	\$1,150	\$1,265	further review and analysis of D's responses to Carlson rogs; prepare notes re same for meet and confer session	Discovery (Non-Deposition)
3/9/2021	Mark Johnson	0.5	\$1,150	\$575	calls (x2) w/GBW re meet and confer w/ OC on rogs; authorities on issue of 25 limit on interrogatories.	Discovery (Non-Deposition)
3/9/2021	Mark Johnson	0.3	\$1,150	\$345	com w/ TCC re doc review tasks and research for mtn to comple further responses to Carlson rogs	Discovery (Non-Deposition)
3/9/2021	Mark Johnson	0.3	\$1,150	\$345	emails w/ SD city staff (x2) re confirming compliance with doc subpoena and timing / process for producing responsive docs.	Discovery (Non-Deposition)
3/9/2021	Mark Johnson	0.2	\$1,150	\$230	coms (x2) w/ BBK re Buot depo and prospeed email to OC re same and strategy for pushing issue, serving notice.	Discovery (Non-Deposition)
3/9/2021	Mark Johnson	0.6	\$1,150	\$690	review docs identified by RSS and comment, follow up on same	Discovery (Non-Deposition)
3/9/2021	Mark Johnson	1.0	\$1,150	\$1,150	research re limit on rogs for meet and confer w/ OC and motion to cmopel	Other Motions
3/9/2021	Mark Johnson	0.5	\$1,150	\$575	work with doc production statistics for presentation to court with request for discovery CMC re extensions of time.	Other Motions
3/9/2021	Rachel Steyer	2.6	\$750	\$1,950	reviewing documents pulled and finding relevant sections to add to internal class certification spreadsheet	Discovery (Non-Deposition)
3/9/2021	Travis Close	1.3	\$850	\$1,105	Telephone M/C call with defendants re: failure to respond to plaintiffs' latest set of ROGs	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/9/2021	Travis Close	1.6	\$850	\$1,360	Legal research re: cases finding that each "party" may serve 25 interrogatories	Case Organization, Planning and Strategy
3/9/2021	Travis Close	1.7	\$850	\$1,445	Depo prep -- training materials -- analyze references to "pros and cons of community price method"	Depositions
3/9/2021	Travis Close	1.2	\$850	\$1,020	legal research re: rule limiting to 25 interrogatories for each individual party	Discovery (Non-Deposition)
3/9/2021	Travis Close	0.3	\$850	\$255	Call with MTJ re: next times for motion to compel interrogatories	Discovery (Non-Deposition)
3/10/2021	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ; TCC; RLS re ED depo prep and documents needed for same	Depositions
3/10/2021	Guy Wallace	5.5	\$1,350	\$7,425	preparation of topics and questions for ED depos; review and analysis of D's policy and procedure manual	Depositions
3/10/2021	Mark Johnson	2.5	\$1,150	\$2,875	review of recently produced docs for depos and for examples of late produced docs for requesting discovery CMC and modification of schedule	Case Organization, Planning and Strategy
3/10/2021	Mark Johnson	0.2	\$1,150	\$230	coms w/ RAB & GBW re redactions in latest productions, additional residency agreements and findings re arbitration opt-out; new JND review contract	Discovery (Non-Deposition)
3/10/2021	Rachel Steyer	1.3	\$750	\$975	conducted search and review of ADA related documents and policies in preparation for ED deposition	Depositions
3/10/2021	Rachel Steyer	0.2	\$750	\$150	reviewing class member email circulated by cocounsel to determine whether eligible for outreach	Discovery (Non-Deposition)
3/10/2021	Rachel Steyer	0.4	\$750	\$300	email to GBW, TCC, MTJ with relevant documents requested in preparation for ED depos	Discovery (Non-Deposition)
3/10/2021	Travis Close	0.6	\$850	\$510	Team meeting with BBK, JY, AX, and RLS re: depo strategy for next week	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/10/2021	Travis Close	0.9	\$850	\$765	Gather DSS citations from former Hemet facility and organize for Theresa Ward depo	Depositions
3/10/2021	Travis Close	0.3	\$850	\$255	Email to team re: lawrence quinlan docs for depo	Depositions
3/11/2021	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ; GG re request for CMC with MJ Beeler re discovery and class cert schedule	Class Certification
3/11/2021	Guy Wallace	4.4	\$1,350	\$5,940	preparation of topics, questions and exhibits for ED depositions, including Ward	Depositions
3/11/2021	Mark Johnson	0.8	\$1,150	\$920	call w D Marks re 9 issues related to staffing analysis and remaining issues with data and documents needed for same.	Experts (Including Retention)
3/11/2021	Mark Johnson	0.6	\$1,150	\$690	prep for call w/ D Marks re staffing analysis data and remaining documents or clarifications required; notes re same; review prior coms for same	Experts (Including Retention)
3/11/2021	Mark Johnson	2.2	\$1,150	\$2,530	continue working on revisions and additions to draft request for discovery CMC related to seeking modification of class cert deadline	Other Motions
3/11/2021	Mark Johnson	0.3	\$1,150	\$345	calls (x3) w/ GBW re additional edits and revisions to draft request for CMC	Other Motions
3/11/2021	Mark Johnson	0.2	\$1,150	\$230	email and call w/ GCG re draft request for discovery CMC and extension of class cert deadline.	Other Motions
3/11/2021	Rachel Steyer	0.2	\$750	\$150	received check in call from class member, wanted status update about case, took name and contact info for team member follow up	Class Outreach and Contact
3/11/2021	Rachel Steyer	0.2	\$750	\$150	email to KDL, KAJ, TRB regarding following up with class member and drafting declaration	Class Outreach and Contact
3/11/2021	Rachel Steyer	1.7	\$750	\$1,275	conducted document review in search of documents requested by GBW in preparation for ED depo	Depositions
3/11/2021	Travis Close	1.3	\$850	\$1,105	Continue researching cases on whether rule 33(a) limits to 25 ROGs per side or per party	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/11/2021	Travis Close	0.9	\$850	\$765	Research cases showing judges' discretion to order additional discovery pursuant to rule 26(b)	Discovery (Non-Deposition)
3/11/2021	Travis Close	1.0	\$850	\$850	Begin drafting memo with caselaw showing that rule 33(a) ROGs limits are by party, not per side	Discovery (Non-Deposition)
3/12/2021	Guy Wallace	4.7	\$1,350	\$6,345	review and analysis of documents and potential exhibits for Ward depo	Depositions
3/12/2021	Guy Wallace	0.8	\$1,350	\$1,080	com's with MTJ; TCC; RLS; EO; BFK re documents needed for ED depositions	Depositions
3/12/2021	Guy Wallace	0.6	\$1,350	\$810	review and analysis of Request for CMC with MJ Beeler; com's with MTJ re same; review and analysis of Order from MJ Beeler re same	Discovery (Non-Deposition)
3/12/2021	Guy Wallace	0.9	\$1,350	\$1,215	review and edit draft of motion for protective order re named P's depositions; com's with MTJ re same	Other Motions
3/12/2021	Mark Johnson	0.7	\$1,150	\$805	calls w/ GBW re ltr breif re P depositions, docs for ED depositions, request for discovery CMC	Case Organization, Planning and Strategy
3/12/2021	Mark Johnson	0.2	\$1,150	\$230	emails w/ GLM re joint ltr re p depositions; logistics and contacts for remote depo software; document production	Discovery (Non-Deposition)
3/12/2021	Mark Johnson	3.0	\$1,150	\$3,450	draft P's section of ltr breif re P depo dates	Other Motions
3/12/2021	Mark Johnson	0.2	\$1,150	\$230	final edtis to request for discovery CMC; com w LEC re filing	Other Motions
3/12/2021	Mark Johnson	0.2	\$1,150	\$230	call w/ TCC re research for mtn re p depositions	Other Motions
3/12/2021	Rachel Steyer	0.2	\$750	\$150	phone call with GBW to discuss ED depo	Depositions
3/12/2021	Travis Close	0.2	\$850	\$170	Email to BFK re: next steps for completing assignment tracking facility revenues	Case Organization, Planning and Strategy
3/12/2021	Travis Close	1.2	\$850	\$1,020	Further legal research on cases where protective order was granted to postpone deposition (9th circuit)	Case Organization, Planning and Strategy
3/12/2021	Travis Close	0.4	\$850	\$340	Call with GBW re: docs needed for theresa ward deposition	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/12/2021	Travis Close	0.2	\$850	\$170	Email to GBW re: Brookdale hemet divestment	Depositions
3/12/2021	Travis Close	0.2	\$850	\$170	Call with GBW re: questions about two hemet facilities, one of which has closed its doors	Depositions
3/12/2021	Travis Close	0.9	\$850	\$765	Depo prep -- analyze tenure of EDs at Hemet and Sunwest facilities	Depositions
3/12/2021	Travis Close	1.3	\$850	\$1,105	Further legal research on cases where protective order was granted to postpone deposition (other circuits)	Depositions
3/12/2021	Travis Close	0.8	\$850	\$680	Team doc review meeting with AX, EPO, JMP, BK, and KS	Discovery (Non-Deposition)
3/12/2021	Travis Close	0.4	\$850	\$340	Analyze progress of BFK on revenue collection/analysis assignment	Discovery (Non-Deposition)
3/13/2021	Guy Wallace	3.9	\$1,350	\$5,265	preparation of topics, questions and exhibits for ED depositions	Depositions
3/14/2021	Guy Wallace	5.2	\$1,350	\$7,020	preparation of topics, questions and exhibits for ED depositions; com's with MTJ re same (.5)	Depositions
3/14/2021	Mark Johnson	2.2	\$1,150	\$2,530	locate and review docs for ED Ward depo and calls w/ GBW re same	Depositions
3/14/2021	Mark Johnson	2.8	\$1,150	\$3,220	analyze D responses to Carlson rogs; research for joint MTC letter and begin drafting same	Discovery (Non-Deposition)
3/14/2021	Rachel Steyer	0.5	\$750	\$375	phone call with MTJ to discuss depo prep	Depositions
3/14/2021	Rachel Steyer	0.2	\$750	\$150	email to GBW, TCC, MTJ regarding coordination for organization of exhibit list in preparation for ED deposition	Depositions
3/14/2021	Rachel Steyer	1.8	\$750	\$1,350	reviewing redacted files within document review, locating relevant files for class certification and/or ED depositions	Depositions
3/15/2021	Guy Wallace	5.2	\$1,350	\$7,020	preparation of topics, question, exhibits for ED depositions	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/15/2021	Guy Wallace	3.8	\$1,350	\$5,130	review and analysis of exhibits for Ward depo; com's with MTJ; TCC; RLS re same (.7)	Depositions
3/15/2021	Mark Johnson	0.9	\$1,150	\$1,035	calls (x4) w/ GBW re ED depo outline, documents to be used as exhibits	Depositions
3/15/2021	Mark Johnson	0.4	\$1,150	\$460	call and emails w/ RLS re exhibits for Ward depo; organization and uploading of same	Depositions
3/15/2021	Mark Johnson	1.8	\$1,150	\$2,070	review docs for possible exhibits to Ward depo and email exchanges w/ RLS, TCC and GBW re same	Depositions
3/15/2021	Mark Johnson	0.1	\$1,150	\$115	email to OC re privilege logs	Discovery (Non-Deposition)
3/15/2021	Mark Johnson	0.8	\$1,150	\$920	review prior RPDs and emails concerning production of task times and task time studies; locate and review docs describing basis for norms and service alignment history for demand to D for further production	Discovery (Non-Deposition)
3/15/2021	Mark Johnson	3.5	\$1,150	\$4,025	further analysis of D's responses to Carlson rogs and work on P section of joint letter brief on mtn to compel	Other Motions
3/15/2021	Mark Johnson	0.3	\$1,150	\$345	final review of ltr brief re P depos and email exchange w/ COC re approval for filing.	Other Motions
3/15/2021	Rachel Steyer	0.2	\$750	\$150	phone call with MTJ to discuss preparations and organization of documents and sharing with cocounsel	Depositions
3/15/2021	Rachel Steyer	0.2	\$750	\$150	email to GBW, TCC, MTJ regarding ongoing coordinating of exhibit and document gathering in preparation for deposition	Depositions
3/15/2021	Travis Close	0.8	\$850	\$680	Review/analyze edits to final draft of joint letter brief re: plaintiffs' deposition	Depositions
3/15/2021	Travis Close	0.3	\$850	\$255	Call with GBW re executive director tenure research for Hemet and Sunwest facilities	Depositions
3/15/2021	Travis Close	0.2	\$850	\$170	Email to RLS re: exhibit for theresa ward deposition	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/15/2021	Travis Close	1.6	\$850	\$1,360	Review/analyze DSS facility evaluation reports and complaint investigation reports to determine ED tenure at Sunwest facility	Depositions
3/15/2021	Travis Close	0.9	\$850	\$765	Review/analyze DSS facility evaluation reports and complaint investigation reports to determine ED tenure at Hemet facility	Depositions
3/15/2021	Travis Close	1.2	\$850	\$1,020	Review/analyze Lawrence Quinlan & Theresa Ward records to determine length of time that they resided in the facility simultaneously	Depositions
3/15/2021	Travis Close	1.2	\$850	\$1,020	Review all records of Theresa Ward to determine length of time of ED at all Brookdale facilities	Depositions
3/15/2021	Travis Close	0.6	\$850	\$510	Investigate whether theresa ward was ED at Brookdale Hemet	Depositions
3/15/2021	Travis Close	0.4	\$850	\$340	Email to team re: results of theresa ward tenure analysis	Depositions
3/15/2021	Travis Close	0.2	\$850	\$170	Email to MTJ re: theresa ward personnel reports as evidence of tenure at Sunwest facility	Depositions
3/16/2021	Guy Wallace	6.7	\$1,350	\$9,045	preparation of topics, questions and exhibits for ED depos; com's with JY; MTJ; RLS re same (1.5)	Depositions
3/16/2021	Guy Wallace	3.4	\$1,350	\$4,590	preparation of topics, questions and exhibits re Labor Budgets, transportation, emergency evacuation, CMIP, Theresa Ward	Depositions
3/16/2021	Mark Johnson	0.6	\$1,150	\$690	call w/ Sharon Eidler re case stratus, background and witnesses	Case Organization, Planning and Strategy
3/16/2021	Mark Johnson	0.5	\$1,150	\$575	calls w/ GBW (x4) re Ward depo, exhibits	Depositions
3/16/2021	Mark Johnson	1.1	\$1,150	\$1,265	zoom call w/ GBW and RLS re prep for video depo of Ward, mechancis of same, software and handling of exhibits.	Depositions
3/16/2021	Mark Johnson	0.1	\$1,150	\$115	email to OC, COC and reporter re change in depo start time for Ward, email w/ JY re same	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/16/2021	Mark Johnson	0.7	\$1,150	\$805	further calls w/ GBW re exhibits for Ward depo and sewer service alignment issues	Depositions
3/16/2021	Mark Johnson	1.5	\$1,150	\$1,725	review additional potential exhibits for Ward depo, including emails and service alignment doc	Depositions
3/16/2021	Mark Johnson	0.2	\$1,150	\$230	emails w/ RAB, RBBG COC re supplemental document production from plaintiffs.	Discovery (Non-Deposition)
3/16/2021	Mark Johnson	0.5	\$1,150	\$575	review latest production in relativity, include scan of class lit, pendant data and 2021 policy manual	Discovery (Non-Deposition)
3/16/2021	Mark Johnson	2.5	\$1,150	\$2,875	finish drafting P section of ltr brief re motion to compel responses to Carlson rogs, including additional research and review of responses for same	Other Motions
3/16/2021	Rachel Steyer	0.2	\$750	\$150	email to GBW, TCC, MTJ regarding additional documents for exhibit list	Depositions
3/16/2021	Rachel Steyer	0.3	\$750	\$225	email to MTJ regarding miscellaneous things related to depo prep, uploading exhibits	Depositions
3/16/2021	Rachel Steyer	0.2	\$750	\$150	phone call with GBW to discuss ongoing depo prep and exhibits to review	Depositions
3/16/2021	Rachel Steyer	0.9	\$750	\$675	reviewing emails gathered by CAC concerning communications involving deponent	Depositions
3/16/2021	Rachel Steyer	0.7	\$750	\$525	reviewing two documents and identifying relevant info re ADA per GBW request	Depositions
3/16/2021	Rachel Steyer	0.2	\$750	\$150	email to GBW and MTJ re relevant ADA info in two exhibits as requested by GBW	Depositions
3/16/2021	Travis Close	1.4	\$850	\$1,190	Depo prep -- review and analyze docs related to SA 3.0 Phase II	Depositions
3/16/2021	Travis Close	0.5	\$850	\$425	Analyze amended draft outline by GBW of theresa ward	Depositions
3/16/2021	Travis Close	0.2	\$850	\$170	Email to RLS re: missing module 2	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/16/2021	Travis Close	0.7	\$850	\$595	Review and analyze docs shared by CAC on topic of theresa ward hot docs (referencing SA and benchmarks)	Depositions
3/16/2021	Travis Close	0.2	\$850	\$170	Email to CAC re: additional exhibits for wednesday's depo	Depositions
3/17/2021	Guy Wallace	10.4	\$1,350	\$14,040	prepare for and take deposition of Theresa Ward	Depositions
3/17/2021	Guy Wallace	0.9	\$1,350	\$1,215	com's with JY; AX; MTJ; TCC; RLS re results of Ward Depo	Depositions
3/17/2021	Mark Johnson	0.4	\$1,150	\$460	team call w/ /gbw, jy, gcg, tcc, ax, bkk re debriefing of Ward depo and prep for Atein depo	Depositions
3/17/2021	Mark Johnson	0.5	\$1,150	\$575	calls (x2) w/ GBW re Ward depo testimony and issues for next depo	Depositions
3/17/2021	Mark Johnson	0.7	\$1,150	\$805	review docs produced containing references to Anna Reddy for deposition.	Depositions
3/17/2021	Mark Johnson	0.2	\$1,150	\$230	email to COC re new version of P&P manual, differences noted; upload to shared drive	Discovery (Non-Deposition)
3/17/2021	Mark Johnson	0.7	\$1,150	\$805	prep for hearing on class cert deadline, MTC expert photos, MTC P depositions, including call w/ GBW (.1), review of docket for timeline and prior requests for discovery	Other Motions
3/17/2021	Rachel Steyer	0.4	\$750	\$300	phone call with GBW reviewing final depo outline	Depositions
3/17/2021	Rachel Steyer	0.2	\$750	\$150	phone call w/GBW during lunch break to discuss upcoming exhibits and reviewing progress of depo	Depositions
3/17/2021	Rachel Steyer	0.5	\$750	\$375	reviewing final depo outline and double checking exhibit list, uploading docs to remote depo platform	Depositions
3/17/2021	Rachel Steyer	7.8	\$750	\$5,850	attending deposition, assisting GBW with exhibits	Depositions
3/17/2021	Rachel Steyer	0.3	\$750	\$225	phone call w/GBW to discuss how depo went	Depositions
3/17/2021	Rachel Steyer	0.4	\$750	\$300	phone call to review today's depo and pass along tips to cocounsel for depo prep	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/17/2021	Travis Close	0.4	\$850	\$340	Review and analyze floor plans and architectural drawings for Sunwest facility	Depositions
3/17/2021	Travis Close	1.4	\$850	\$1,190	Depo prep -- review and analyze docs related to resident complaints of understaffing	Depositions
3/17/2021	Travis Close	1.7	\$850	\$1,445	Depo prep -- review and analyze docs related to resident understaffing complaints	Depositions
3/18/2021	Guy Wallace	0.5	\$1,350	\$675	analysis of testimony from ED depositions; Rule 30(b)(6) depositions and preparation for same; schedule re same	Depositions
3/18/2021	Guy Wallace	1.6	\$1,350	\$2,160	legal research and analysis re limit on number of interrogatories per party; com's with MTJ re discovery letter re same	Other Motions
3/18/2021	Guy Wallace	4.6	\$1,350	\$6,210	prepare for and participate in discovery conference with MJ Beeler re class certification schedule; D's MTC re expert photographs; P's depositions	Other Motions
3/18/2021	Guy Wallace	0.5	\$1,350	\$675	review and analysis of draft MTC re number of interrogatories	Other Motions
3/18/2021	Mark Johnson	0.2	\$1,150	\$230	email exchanges w/ COC re Ataein depo, planning for other depositions.	Depositions
3/18/2021	Mark Johnson	1.5	\$1,150	\$1,725	prep for discovery hearing on expert photos, plaintiffs' depositions, extension of class cert deadline, including call w/ GBW	Other Motions
3/18/2021	Mark Johnson	3.5	\$1,150	\$4,025	participate in Zoom hearing on mtc expert photos, P's depositions, extension of class cert time, including prep for same while waiting to be called.	Other Motions
3/18/2021	Travis Close	0.4	\$850	\$340	Review/analyze draft access report of Fountaingrove facility by kim blackseth	Case Organization, Planning and Strategy
3/18/2021	Travis Close	0.8	\$850	\$680	Depo prep -- review and analyze Kimia Ataein emails pertaining to staffing	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/18/2021	Travis Close	0.9	\$850	\$765	Depo prep -- review and analyze Kimia Ataein emails pertaining to rate increases	Depositions
3/18/2021	Travis Close	1.2	\$850	\$1,020	Depo prep --- review and analyze emails at Brookhurst facility related to EDs instructed not to go over benchmark	Depositions
3/18/2021	Travis Close	0.5	\$850	\$425	Review pendant data docs at Brookhurst facility	Depositions
3/18/2021	Travis Close	1.1	\$850	\$935	Depo prep -- Kim Ataein -- search for documents showing resident requests for reasonable accommodation to remove barriers from units	Depositions
3/18/2021	Travis Close	0.9	\$850	\$765	Continue review/analysis of complaints related to understaffing by residents and staff	Depositions
3/19/2021	Guy Wallace	0.7	\$1,350	\$945	review and analysis of Order from MJ Beeler; com's with MTJ re same and preparation of Local Rule 7-11 Motion re schedule	Class Certification
3/19/2021	Guy Wallace	1.9	\$1,350	\$2,565	analysis of preparation of expert declarations necessary for MCC and status of same	Class Certification
3/19/2021	Guy Wallace	0.5	\$1,350	\$675	com's with RLS re preparation for Rule 30(b)(6) depo	Depositions
3/19/2021	Guy Wallace	1.1	\$1,350	\$1,485	preparation of schedule of topics and assignments for Rule 30(b)(6) deposition notice; com's with GG; AX; BU; MTJ re same	Depositions
3/19/2021	Guy Wallace	1.2	\$1,350	\$1,620	team meeting re document analysis and preparation for ED and Rule 30(b)(6) depositions	Discovery (Non-Deposition)
3/19/2021	Guy Wallace	2.1	\$1,350	\$2,835	revise and edit draft MTC re D's failure to respond to Carlson Interrogatories; com's with MTJ re same	Other Motions
3/19/2021	Mark Johnson	1.3	\$1,150	\$1,495	call w/ GBW to plan schedule and assignments for 30b6 deipo	Depositions
3/19/2021	Mark Johnson	1.2	\$1,150	\$1,380	doc review mtg re ongoing doc review projects for depo prep	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/19/2021	Mark Johnson	1.5	\$1,150	\$1,725	revise 30b6 depo notice to include schedule by topics, other revisions	Depositions
3/19/2021	Mark Johnson	0.2	\$1,150	\$230	com w/ COC re revised 30b6 depo notice; further revisions to same to accommodate schedules	Depositions
3/19/2021	Mark Johnson	2.0	\$1,150	\$2,300	review docs / exhibits for depo	Depositions
3/19/2021	Mark Johnson	0.7	\$1,150	\$805	com w/ GBW re MTC joint ltr brief re D response to interrogatories; revise same; email to OC re same and return date	Discovery (Non-Deposition)
3/19/2021	Mark Johnson	0.2	\$1,150	\$230	emails to OC re Org chart supp production and task time studies production.	Discovery (Non-Deposition)
3/19/2021	Rachel Steyer	0.2	\$750	\$150	reviewing draft 30b6 depo notice and list of documents to collect	Depositions
3/19/2021	Rachel Steyer	0.3	\$750	\$225	phone call w/GBW to discuss 30b6 depo, gathering documents and preparation	Depositions
3/19/2021	Rachel Steyer	2.2	\$750	\$1,650	reviewing and analyzing document corresponding to ADA 30b6 depo prep	Depositions
3/19/2021	Rachel Steyer	0.6	\$750	\$450	reviewing documents circulated by JMP concerning ADA	Discovery (Non-Deposition)
3/19/2021	Travis Close	1.4	\$850	\$1,190	Weekly doc review meeting with team re: docs necessary for ED depositions, plaintiff depositions, and 30(b)(6) depositions	Depositions
3/19/2021	Travis Close	0.3	\$850	\$255	Review rough draft of Theresa Ward deposition transcript	Depositions
3/19/2021	Travis Close	0.2	\$850	\$170	Email to CAC re: sharing benchmark-related docs with co-counsel for upcoming depo	Depositions
3/19/2021	Travis Close	1.0	\$850	\$850	Review and analyze understaffing emails from san ramon facility (# BKD2129621-BKD2507039) (24-52 of 52)	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/19/2021	Travis Close	1.3	\$850	\$1,105	Review and analyze understaffing emails from san ramon facility (# BKD1722195-BKD2129621) (1-24 of 52)	Discovery (Non-Deposition)
3/20/2021	Guy Wallace	1.5	\$1,350	\$2,025	revise and edit task plan for class certification motion	Class Certification
3/21/2021	Mark Johnson	0.8	\$1,150	\$920	separate email exchanges w/ RAB, RLS, TCC re document review and organizing for Reddy depo, motion to amend schdule	Case Organization, Planning and Strategy
3/21/2021	Mark Johnson	0.2	\$1,150	\$230	draft email to OC re efforts to meet and confer re 30b6 depo; service of notice	Depositions
3/21/2021	Rachel Steyer	1.6	\$750	\$1,200	gathering and reviewing ADA related dcouments and policies in preparation for 30b6 ADA depo	Depositions
3/22/2021	Guy Wallace	2.1	\$1,350	\$2,835	revise and edit depo outline from AX re depo of ED	Depositions
3/22/2021	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ re preparation for ED depo of Reddy; Local Rule 7-11 Motion re schedule; document review and analysis and status thereof	Discovery (Non-Deposition)
3/22/2021	Guy Wallace	0.6	\$1,350	\$810	preparation of LR 7-11 motion re schedule	Other Motions
3/22/2021	Guy Wallace	0.2	\$1,350	\$270	com's with GG re status of settlement and com's from Lee to KAS	Settlement
3/22/2021	Mark Johnson	0.6	\$1,150	\$690	call w/ GBW re depo prep for remaining ED depositions; noticing 4 individual depositions; preparing LR 7-11 depo	Case Organization, Planning and Strategy
3/22/2021	Mark Johnson	0.5	\$1,150	\$575	coms w/ LEC re preparation of depo notices for Dolcater, Bowman, Toomer, Garner; review and modify each, pdf and send w/ cover email to OC	Depositions
3/22/2021	Mark Johnson	5.5	\$1,150	\$6,325	prepare for Reddy depo, including work on outline and review of docs	Depositions
3/22/2021	Mark Johnson	0.5	\$1,150	\$575	review of Stiner-specific docs fo Reddy depo	Depositions
3/22/2021	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re potential call w. cOC re discussions w/ Charlie Lee re settlement	Settlement

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/22/2021	Rachel Steyer	3.4	\$750	\$2,550	reviewing updated memo from JMP with updated list of ADA documetns, searching through and pulling relevant ones in preparation for 30b6 depo	Depositions
3/22/2021	Rachel Steyer	0.7	\$750	\$525	working on draft 30b6 ADA depo outline	Depositions
3/22/2021	Travis Close	0.3	\$850	\$255	Email to MTJ re: info on Anna Reddy's past work history	Case Organization, Planning and Strategy
3/22/2021	Travis Close	0.2	\$850	\$170	Email to MTJ re: locating recently produced docs that are necessary to Ps' motion for class cert for judge gilliam	Class Certification
3/22/2021	Travis Close	0.2	\$850	\$170	Email to EPO re: san ramon floor plans sent to staffing experts	Depositions
3/22/2021	Travis Close	0.3	\$850	\$255	Review and analyze info on BEST audits spreadsheets	Depositions
3/22/2021	Travis Close	0.9	\$850	\$765	Depo prep -- analyze Brookdale San Ramon DSS citations for evidence of understaffing	Depositions
3/22/2021	Travis Close	0.3	\$850	\$255	Call with AX re: strategy for ongoing deposition (on break)	Depositions
3/22/2021	Travis Close	0.2	\$850	\$170	Email to KM (at JND) re: progress on supplemental residency agreement analysis	Discovery (Non-Deposition)
3/22/2021	Travis Close	0.4	\$850	\$340	Email to gary waters re: permit history docs and floor plans that have been previously shared with experts	Discovery (Non-Deposition)
3/22/2021	Travis Close	0.3	\$850	\$255	Review vaught & boutris's analysis re: how to substitute successor in interest after plaintiffs' deaths	Pleadings and Motions Re: Pleadings
3/22/2021	Travis Close	1.6	\$850	\$1,360	Analyze important docs recently produced by Brookdale (2-5-21 production) for class cert extension effort	Pleadings and Motions Re: Pleadings
3/22/2021	Travis Close	1.7	\$850	\$1,445	Continue analyzing important docs recently produced by Brookdale (2-5-21 production) for class cert extension effort	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/23/2021	Guy Wallace	0.5	\$1,350	\$675	analysis of results of tabulation of Residency Agreements and number of person who opted out of arbitration; com's with MTJ and RAB re same	Class Certification
3/23/2021	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ; TCC; RAB re D's February 2021 production of documents and documents therein that were not produced previously	Class Certification
3/23/2021	Guy Wallace	2.9	\$1,350	\$3,915	preparation and drafting of LR 7-11 Motion re schedule re class certification	Other Motions
3/23/2021	Guy Wallace	0.5	\$1,350	\$675	com's with GG; MTJ re settlement and analysis of current posture	Settlement
3/23/2021	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re topics for Reddy depo	Depositions
3/23/2021	Mark Johnson	8.0	\$1,150	\$9,200	further prep for Reddy depo, including coms w/ staff re docs, review docs and work on outline	Depositions
3/23/2021	Mark Johnson	0.1	\$1,150	\$115	email w/ AX re pendant data subpoenas and call w/ counsel for third party.	Discovery (Non-Deposition)
3/23/2021	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW and then RAB re analysis of document production for late produced documents	Other Motions
3/23/2021	Rachel Steyer	1.7	\$750	\$1,275	working on 30b6 ADA depo outline, reviewing documents to identify potential exhibits	Case Organization, Planning and Strategy
3/23/2021	Rachel Steyer	4.7	\$750	\$3,525	organizing and gathering exhibits for MTJ in preparation for ED depo	Discovery (Non-Deposition)
3/23/2021	Travis Close	0.2	\$850	\$170	Email to RLS re: info on attachments to residency agreement contracts	Case Organization, Planning and Strategy
3/23/2021	Travis Close	0.3	\$850	\$255	Email to MTJ, GBW re: tentative results of analysis of import ant docs produced in february 2021	Case Organization, Planning and Strategy
3/23/2021	Travis Close	0.8	\$850	\$680	Review and analyze Def's admissions in Practical Applications of Brookdale Policy presentations	Case Organization, Planning and Strategy
3/23/2021	Travis Close	0.9	\$850	\$765	Review and analyze BEST audit data for San Ramon, Scotts Valley facilities	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/23/2021	Travis Close	0.4	\$850	\$340	Depo prep -- community fees -- review complaint for allegations re: fees and charges	Depositions
3/23/2021	Travis Close	1.0	\$850	\$850	Depo prep -- community fees -- begin drafting outline for #8 30(b)(6) topic	Depositions
3/23/2021	Travis Close	1.2	\$850	\$1,020	Analysis of arbitration opt outs/opt ins in supplemental residency agreement contract review	Discovery (Non-Deposition)
3/23/2021	Travis Close	0.2	\$850	\$170	Analyze findings by RAB re: docs produced recently that were already produced earlier	Discovery (Non-Deposition)
3/24/2021	Guy Wallace	1.8	\$1,350	\$2,430	preparation and drafting of declaration of GBW re 7-11 Motion re schedule re class certification	Other Motions
3/24/2021	Guy Wallace	3.6	\$1,350	\$4,860	preparation and drafting of LR 7-11 motion re schedule on class certification	Other Motions
3/24/2021	Guy Wallace	0.7	\$1,350	\$945	com's with GG; KAS; MTJ re settlement and preparation for MCC	Settlement
3/24/2021	Mark Johnson	13.0	\$1,150	\$14,950	prep for Reddy depo, including review and collect exhibits, revise and add to outline, emails w/ staff re docs; coms w/ GBW and RLS	Depositions
3/24/2021	Mark Johnson	0.5	\$1,150	\$575	call w/ GBW, GCG, stebner re settlement issues	Settlement
3/24/2021	Rachel Steyer	0.9	\$750	\$675	updating exhibit tracking spreadsheet to include exhibits used in latest ED depo	Case Organization, Planning and Strategy
3/24/2021	Rachel Steyer	0.2	\$750	\$150	phone call w/MTJ to discuss exhibit order and preparation for ED depo	Depositions
3/24/2021	Rachel Steyer	0.2	\$750	\$150	email to GBW regarding pendant response time policy based on depo transcript	Depositions
3/24/2021	Rachel Steyer	0.2	\$750	\$150	reviewing depo transcript to find info for pendant response time policy per GBW question	Depositions
3/24/2021	Rachel Steyer	2.4	\$750	\$1,800	organizing and gathering/searching for documents requested by MTJ in preparation for ED depo	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/24/2021	Travis Close	1.6	\$850	\$1,360	Depo prep -- eview and analyze marielouise harris emails showing how advanced customizations are developed	Depositions
3/24/2021	Travis Close	0.3	\$850	\$255	Email to AX re: sharing relevant emails re benchmarks for marie harris deposition	Depositions
3/24/2021	Travis Close	1.2	\$850	\$1,020	Depo prep -- Continue drafting outline re: community fees topics	Depositions
3/25/2021	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ re deposition of Reddy	Depositions
3/25/2021	Guy Wallace	3.7	\$1,350	\$4,995	preparation and drafting of Local Rule 7-11 Motion; Declaration of GBW re same	Other Motions
3/25/2021	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of 2019 Mediation Brief for request re IR resolution from Charlie Lee; com's with KAS; GG; MTJ re same	Settlement
3/25/2021	Mark Johnson	0.1	\$1,150	\$115	email to Thornton and Marks re Brookdale norms	Case Organization, Planning and Strategy
3/25/2021	Mark Johnson	7.0	\$1,150	\$8,050	deposition of Anna Reddy (on the record)	Depositions
3/25/2021	Mark Johnson	2.2	\$1,150	\$2,530	prep for Reddy depo before depo and during breaks, including call and emails with Rachel and other staff re testimony and exhibits, review of docs.	Depositions
3/25/2021	Mark Johnson	0.1	\$1,150	\$115	call w/ GBW re Reddy depo	Depositions
3/25/2021	Mark Johnson	0.4	\$1,150	\$460	draft recap of Reddy depo for COC	Depositions
3/25/2021	Mark Johnson	0.2	\$1,150	\$230	review and repond to AX emial re pendant call supoenas, requested extensions, scope of data avaiable and depo testimony re same.	Discovery (Non-Deposition)
3/25/2021	Rachel Steyer	0.2	\$750	\$150	phone call w/MTJ to review depo exhibits and discuss depo	Depositions
3/25/2021	Rachel Steyer	0.2	\$750	\$150	phone call with MTJ to discuss upcoming exhibit order	Depositions
3/25/2021	Rachel Steyer	7.4	\$750	\$5,550	attending deposition and assisting MTJ with exhibits	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/25/2021	Travis Close	0.4	\$850	\$340	Analyze Brookdale's 202 updates (including for COVID-19) to general policy manual	Case Organization, Planning and Strategy
3/25/2021	Travis Close	0.2	\$850	\$170	Call with GBW re: fortifying his dec iso extension of class cert motion	Class Certification
3/25/2021	Travis Close	0.3	\$850	\$255	Review and analyze Def's correspondance and objections to Ps' 30(b)(6) depo topics notices	Depositions
3/25/2021	Travis Close	0.3	\$850	\$255	Review AX's notes from yesterday's depo	Depositions
3/25/2021	Travis Close	1.3	\$850	\$1,105	Depo prep --- analyze docs related to community fees and billing	Depositions
3/25/2021	Travis Close	1.6	\$850	\$1,360	Analyze final February brookdale production for important docs produced	Discovery (Non-Deposition)
3/25/2021	Travis Close	0.3	\$850	\$255	Call with AX re: strategy for responding to subpoena requests for extension	Discovery (Non-Deposition)
3/25/2021	Travis Close	1.2	\$850	\$1,020	Additions to GBW dec re: motion to extend class cert deadline	Pleadings and Motions Re: Pleadings
3/26/2021	Guy Wallace	0.8	\$1,350	\$1,080	com's with Marks; Thornton; MTJ re D's task times and preparation of staffing analysis	Class Certification
3/26/2021	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re D's objections to P's Rule 30(b)(6) notice; preparation for meet and confer re same	Depositions
3/26/2021	Guy Wallace	0.5	\$1,350	\$675	revise and edit draft Rule 7-11 Motion re class cert schedule	Other Motions
3/26/2021	Guy Wallace	4.4	\$1,350	\$5,940	revise and edit Local Rule 7-11 Motion re class certification schedule and Declaration of GBW re same; com's with GG; BBK; JY; BU; MTJ; TCC; LEC re same (1.4)	Other Motions
3/26/2021	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ re proposed IR and com to Lee re same	Settlement

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/26/2021	Guy Wallace	0.7	\$1,350	\$945	preparation and drafting of com to Lee re proposal re IR only settlement and attachment re categories of IR needed; com's with KAS; GG; MTJ re same	Settlement
3/26/2021	Mark Johnson	1.2	\$1,150	\$1,380	video meeting w/ GBW, JT, DM to review norms and acuity data produced by Brookdale, identify follow up, 30b6 questions, and strategy.	Class Certification
3/26/2021	Mark Johnson	0.3	\$1,150	\$345	review email history and draft follow-up email re production of look up table or replacement data files for assessment data or move-out data	Class Certification
3/26/2021	Mark Johnson	0.3	\$1,150	\$345	email exchanges w/ TMS, RLS re class member inquiry and follow up, results of RLS folllow up and proposed advise.	Class Outreach and Contact
3/26/2021	Mark Johnson	0.7	\$1,150	\$805	doc review team meeting to discuss priortiy review projects fo upcoming depositions.	Depositions
3/26/2021	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW re D's objection to Rule 30b6 depo notice, strategy for meeting and conferring re same and D proposal for compromise on Rog respomses	Discovery (Non-Deposition)
3/26/2021	Mark Johnson	0.2	\$1,150	\$230	quick review of privilege logs and com w/ GBW re same	Discovery (Non-Deposition)
3/26/2021	Mark Johnson	0.7	\$1,150	\$805	review and edit draft mtn for extension of deadline for class cert motion	Other Motions
3/26/2021	Mark Johnson	3.8	\$1,150	\$4,370	work on 7-22 mtn for extension of deadline for class cert mtn inlculuding revisions to mtn and declaration, research docket for same, incert citations to declaration, coms w/ GBW re same.	Other Motions
3/26/2021	Mark Johnson	0.6	\$1,150	\$690	revise proposed outline of injunctive relief to be sought and review and comment on proposed cover email to be sent to COC for communication with third party intermediary on settlement.	Settlement

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/26/2021	Rachel Steyer	0.9	\$750	\$675	updating exhibit tracking spreadsheet	Case Organization, Planning and Strategy
3/26/2021	Rachel Steyer	0.5	\$750	\$375	phone call w/daughter of class member who wrote email to SWCK, provided contact info, agreed to be in touch regarding follow up with her father	Class Outreach and Contact
3/26/2021	Rachel Steyer	0.3	\$750	\$225	reviewing additional documents provided by BFK and RAB which I did not have time to review and examine during 03/25 deposition	Depositions
3/26/2021	Rachel Steyer	0.4	\$750	\$300	email to GBW, TCC, MTJ with thoughts related to ED depo	Depositions
3/26/2021	Rachel Steyer	0.9	\$750	\$675	working on 30b6 ADA depo outline	Depositions
3/26/2021	Travis Close	1.2	\$850	\$1,020	Doc review meeting with MTJ, AX, KS, JMP, CAC, and BK (ongoing depo prep, class cert prep)	Case Organization, Planning and Strategy
3/26/2021	Travis Close	0.4	\$850	\$340	Review and analyze memo by AX re: research on class damages and community fees	Case Organization, Planning and Strategy
3/26/2021	Travis Close	0.2	\$850	\$170	Email to TLM re: potential new plaintiff at napa facility	Class Outreach and Contact
3/26/2021	Travis Close	1.6	\$850	\$1,360	Review and analyze docs produced by Defs for potential declarant/plaintiff alfred simoni	Class Outreach and Contact
3/26/2021	Travis Close	0.3	\$850	\$255	Final review of local rule 7-11 motion before filing	Discovery (Non-Deposition)
3/26/2021	Travis Close	0.2	\$850	\$170	Analyze docs shared by RLS re: new Relias training system for Brookdale facilities	Discovery (Non-Deposition)
3/27/2021	Mark Johnson	0.4	\$1,150	\$460	locate and review assessment related document showing acuity key for Norms spreadsheets; draft email to Mark and Thorton re same.	Class Certification
3/27/2021	Mark Johnson	1.0	\$1,150	\$1,150	coms w/ RAB and GBW re Friday night production; review sample natives produced and docs identified by RAB	Discovery (Non-Deposition)
3/27/2021	Mark Johnson	0.2	\$1,150	\$230	call w. GBW re rog responses and D's proposal re same	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/27/2021	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re latest production, discovery issues pending, meeting and conferring on rog responses and depos	Discovery (Non-Deposition)
3/28/2021	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of D's proposed compromise re responses to Carlson interrogatories; major categories of non-produced documents; deposition scheduling; com's with MTJ re same (.2)	Discovery (Non-Deposition)
3/29/2021	Guy Wallace	1.6	\$1,350	\$2,160	preparation for team meeting re MCC and discovery tasks; com's with MTJ re same (.5)	Class Certification
3/29/2021	Guy Wallace	1.1	\$1,350	\$1,485	tc with GG; BBK; JY; AX; MTJ; TCC; RLS re preparation for MCC and discovery tasks re same	Class Certification
3/29/2021	Guy Wallace	1.5	\$1,350	\$2,025	review and analysis of D's objections to Plaintiffs' Rule 30(b)(6) notice	Depositions
3/29/2021	Guy Wallace	0.7	\$1,350	\$945	tc with MTJ re preparation for meet and confer with D's re Rule 30(b)(6) deposition notice; D's responses to Carlson's Interrogatories; deposition schedule	Discovery (Non-Deposition)
3/29/2021	Guy Wallace	0.6	\$1,350	\$810	tc with Maatman; Riley; Jacobsen; MTJ re P's Rule 30(b)(6) notice; D's responses to Carlson's interrogatories; deposition schedule re Dolcater; Toomer; Garner; Bowman	Discovery (Non-Deposition)
3/29/2021	Guy Wallace	0.7	\$1,350	\$945	tc with MTJ re proposed compromise re P's Rule 30(b)(6) depo notice re topics and length of deposition	Discovery (Non-Deposition)
3/29/2021	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ; TCC; RLS re D's recent production of documents and emails and documents re Service Alignment, benchmarks, variance reports	Discovery (Non-Deposition)
3/29/2021	Guy Wallace	0.5	\$1,350	\$675	com's with Waters; Mastin re preparation of site inspection reports; emergency evacuation	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/29/2021	Mark Johnson	0.7	\$1,150	\$805	team zoom call to discuss discovery follow up projects, motions to compel, expert testimony, depositions assignments doc review projects	Case Organization, Planning and Strategy
3/29/2021	Mark Johnson	0.6	\$1,150	\$690	additional calls w/ GBW (x3) to discuss missing documents that need to be followed up on, assignments, prep for team mtg	Case Organization, Planning and Strategy
3/29/2021	Mark Johnson	0.2	\$1,150	\$230	review newly produced spreadsheet bearing on community customization and draft email to COC Thornton and Marks for expert review and consideration in staffing analysis	Class Certification
3/29/2021	Mark Johnson	0.4	\$1,150	\$460	draft email to OC memorializing results of meet and confer session on 30b6 depo topics and proposing compromise; coms w/ /GBW and GCG re same	Depositions
3/29/2021	Mark Johnson	1.3	\$1,150	\$1,495	further review and analysis of Carlson rog responses and 122 page objections to 30(b)(6) depo notice for meet and confer session, notes re same for call	Discovery (Non-Deposition)
3/29/2021	Mark Johnson	0.6	\$1,150	\$690	call w/ GBW to plan for meet and confer session re rog responses and 30b6 depo	Discovery (Non-Deposition)
3/29/2021	Mark Johnson	0.5	\$1,150	\$575	call w/ OC to meet and confer re Carlson rog responses, 30(b)(6) topics and 4 mgmt depositions	Discovery (Non-Deposition)
3/29/2021	Mark Johnson	0.8	\$1,150	\$920	follow up call w/ GBW re strategy on mtgs to compel rogs and 30b6 topics, work through topics to ID most important issue and develop possible compromise	Discovery (Non-Deposition)
3/29/2021	Mark Johnson	0.3	\$1,150	\$345	draft follow up email to OC Jacobsen and others re continued failure to produce task time studies and related materials	Discovery (Non-Deposition)
3/29/2021	Mark Johnson	3.8	\$1,150	\$4,370	review docs in latest production and collect, save or circulate docs of note; coms w/ COC re same and re docs found by RLS, TCC re service alignment and enforcement of benchmarks.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/29/2021	Rachel Steyer	0.8	\$750	\$600	zoom conference with GBW, TCC, MTJ and co-counsel RBGG regarding ongoing status of case and assignments, depositions, etc	Case Organization, Planning and Strategy
3/29/2021	Rachel Steyer	5.9	\$750	\$4,425	analyzing and reviewing redacted production of documents, saving relevant documents in respective internal files and folders	Discovery (Non-Deposition)
3/29/2021	Travis Close	0.4	\$850	\$340	Depo prep -- eview and analyze Brookdale's motor vehicle policies (recently produced)	Case Organization, Planning and Strategy
3/29/2021	Travis Close	0.4	\$850	\$340	Review and analyze docs located by RLS re: staffing process improvement	Case Organization, Planning and Strategy
3/29/2021	Travis Close	0.3	\$850	\$255	Email to team re: compiling recent docs showing continued focus on benchmarks	Case Organization, Planning and Strategy
3/29/2021	Travis Close	0.8	\$850	\$680	Team meeting with RLS, GBW, MTJ and co-counsel re: class certification strategy	Class Certification
3/29/2021	Travis Close	1.2	\$850	\$1,020	Depo prep -- review and analyze recently produced docs dating to 2020 or later	Depositions
3/29/2021	Travis Close	1.5	\$850	\$1,275	Depo prep -- review and analysis of docs (2020 or more recent) from custodian Kelly Rubin of Service Alignment # BKD2333136-BKD2333214 (1-23 of 221)	Depositions
3/29/2021	Travis Close	0.5	\$850	\$425	Revie and analyze metadata export from RAB for Def's latest production	Discovery (Non-Deposition)
3/29/2021	Travis Close	1.1	\$850	\$935	Analysis of IT employee docs discussing benchmarks; correspondance with regional Service Alignment staff	Discovery (Non-Deposition)
3/29/2021	Travis Close	0.8	\$850	\$680	Analye docs related to the Kronos Workforce dimensions scheduling rollout to facilities (re: centralization)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/29/2021	Travis Close	1.4	\$850	\$1,190	Depo prep -- review and analysis of docs (2020 or more recent) from custodian Kelly Rubin of Service Alignment # BKD2333214-BKD2335492 (23-57 of 221)	Discovery (Non-Deposition)
3/30/2021	Guy Wallace	1.4	\$1,350	\$1,890	legal research and analysis re permissible scope and length of Rule 30(b)(6) depositions	Depositions
3/30/2021	Guy Wallace	1.3	\$1,350	\$1,755	analysis of discovery disputes re information needed for MCC, including re Rule 30(b)(6) depositions; Carlson interrogatory responses; categories of non-produced documents; com's with MTJ re potential compromises re same and use of joint letter brief or discovery conference with MJ Beeler to address issues (.9)	Discovery (Non-Deposition)
3/30/2021	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ re D's compromise proposal re Carlson interrogatory answers and response thereto	Discovery (Non-Deposition)
3/30/2021	Guy Wallace	0.7	\$1,350	\$945	preparation for ZOOM conference re categories of documents that Defendants have failed to produce; com's with MTJ; TCC re same (.3)	Discovery (Non-Deposition)
3/30/2021	Guy Wallace	1.1	\$1,350	\$1,485	ZOOM meeting with MTJ; TCC; RLS; RAB; JMP; EAO; CC; Dion re categories of non-produced documents and analysis of D's 2.88 million page production re same	Discovery (Non-Deposition)
3/30/2021	Guy Wallace	0.7	\$1,350	\$945	com's with RLS; JMP; EAO re specific documents and categories of documents that have been produced in D's recent productions	Discovery (Non-Deposition)
3/30/2021	Guy Wallace	1.5	\$1,350	\$2,025	preparation of outline of request for discovery conference with MJ Beeler and issues to be raised therein re Rule 30(b)(6) depositions and non-produced categories of documents	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/30/2021	Guy Wallace	0.5	\$1,350	\$675	review and analysis of D's opposition to P's Rule 7-11 motion and com's with MTJ re same	Other Motions
3/30/2021	Mark Johnson	1.1	\$1,150	\$1,265	SW team zoom meeting re missing documents for motions to compel and/or discovery status conference, further analysis of documents produced recently	Class Certification
3/30/2021	Rachel Steyer	1.1	\$750	\$825	zoom meeting with GBW, TCC, MTJ, RAB, JMP, EPO, Discovery (Non-Deposition) and CAC to review and identify missing types of documents in latest prodcutions	Discovery (Non-Deposition)
3/30/2021	Rachel Steyer	0.2	\$750	\$150	correspondence with RAB regarding spreadsheet list and info of class member arbitration opt-outs	Discovery (Non-Deposition)
3/30/2021	Rachel Steyer	0.4	\$750	\$300	reviewing latest defense production to find relevant ADA documents	Discovery (Non-Deposition)
3/30/2021	Travis Close	1.4	\$850	\$1,190	Team meeting re: determining important docs that Brookdale has still failed to produce	Case Organization, Planning and Strategy
3/30/2021	Travis Close	0.3	\$850	\$255	Review and analyze docs shared by JMP re: scooter policies	Case Organization, Planning and Strategy
3/30/2021	Travis Close	0.6	\$850	\$510	Watch video training produced by Brookdale on how to budget for regional staff (BKD2844966)	Class Certification
3/30/2021	Travis Close	0.8	\$850	\$680	Analyze Operations Onboarding spreadsheet produced to determine which courses/docs we still need from Brookdale	Class Certification
3/30/2021	Travis Close	1.3	\$850	\$1,105	Analysis of master discovery spreadsheet to help determine which types of Docs are still missing from Def's production	Class Certification
3/30/2021	Travis Close	1.6	\$850	\$1,360	Depo prep -- review and analysis of docs (2020 or more recent) from custodian Kelly Rubin of Service Alignment # BKD2335492-BKD2844982 (57-88 of 221)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/30/2021	Travis Close	0.4	\$850	\$340	Review and analyze latest productions for pendant data logs produced	Discovery (Non-Deposition)
3/31/2021	Guy Wallace	0.9	\$1,350	\$1,215	preparation of outline of expert declarations re class certification	Class Certification
3/31/2021	Guy Wallace	2.5	\$1,350	\$3,375	legal research and analysis re scope of D's duty to produce Rule 30(b)(6) designees re topics noticed by Plaintiffs	Discovery (Non-Deposition)
3/31/2021	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re request for discovery conference; deposition schedule	Discovery (Non-Deposition)
3/31/2021	Guy Wallace	3.6	\$1,350	\$4,860	preparation and drafting of request for discovery conference re Rule 30(b)(6) depositions and document production	Other Motions
3/31/2021	Mark Johnson	0.7	\$1,150	\$805	search for and review and take notes on pendant data in latest productions	Discovery (Non-Deposition)
3/31/2021	Mark Johnson	0.3	\$1,150	\$345	draft email/memo re results of search for pendant data production	Discovery (Non-Deposition)
3/31/2021	Mark Johnson	0.6	\$1,150	\$690	calls w/ GBW (x4) re request for discovery conference, contents of same, position re D's counter offer on Carlson rogs.	Discovery (Non-Deposition)
3/31/2021	Mark Johnson	0.7	\$1,150	\$805	coms w/ /RAB re replacement assessment data; open and review same and upload to shared site; email to Thornton and Marks re same	Discovery (Non-Deposition)
3/31/2021	Mark Johnson	0.4	\$1,150	\$460	coms w/ COC and staff re docs related to service alignment, norms and benchmarks, pendant data information	Discovery (Non-Deposition)
3/31/2021	Mark Johnson	0.1	\$1,150	\$115	email exchange w/ AX re pendant data subpoenas	Discovery (Non-Deposition)
3/31/2021	Mark Johnson	3.5	\$1,150	\$4,025	draft sections of request for discovery conference related to background for 30b6 depo notice and task times, task time studies; research email record and docs for same; email exchange w/ GBW re same	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/31/2021	Rachel Steyer	1.2	\$750	\$900	continued reviewing redacted production and other corresponding documents	Discovery (Non-Deposition)
4/1/2021	Guy Wallace	0.3	\$1,350	\$405	com's with TCC; RLS; CC re deposition of Garner and documents re same	Depositions
4/1/2021	Guy Wallace	4.7	\$1,350	\$6,345	preparation and drafting of Request for Discovery Conference re Rule 30(b)(6) depositions and non-produced documents	Discovery (Non-Deposition)
4/1/2021	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ re request for discovery conference; pendant data; deposition of Dolcater	Discovery (Non-Deposition)
4/1/2021	Guy Wallace	0.5	\$1,350	\$675	revise and edit draft letter re pendant data from AX	Discovery (Non-Deposition)
4/1/2021	Mark Johnson	0.8	\$1,150	\$920	calls (zx2) with GBW re class cert strategy and needs, request for discovery conference, doc review, depo schedule and prep	Class Certification
4/1/2021	Mark Johnson	0.7	\$1,150	\$805	email exchanges w/ RAB, B Kelley, C Craig, TCC, RLS re doc review for depo prep, relevant document discoveries; review same.	Depositions
4/1/2021	Mark Johnson	0.3	\$1,150	\$345	review and respond to emails re San Diego subpoenas w. Travis, Titan reps	Discovery (Non-Deposition)
4/1/2021	Mark Johnson	0.1	\$1,150	\$115	emails w/ OC re depo schedule, document production	Discovery (Non-Deposition)
4/1/2021	Mark Johnson	3.5	\$1,150	\$4,025	work on Request for discovery conference, including review GBW piece and integrate into draft; review prior email meet and confer history	Other Motions
4/1/2021	Rachel Steyer	3.5	\$750	\$2,625	reviewing productions in preparation for upcoming depositions	Depositions
4/1/2021	Rachel Steyer	2.5	\$750	\$1,875	reviewing redacted production and corresponding documents for relevant docs/info in preparation for upcoming depositions and class certification	Discovery (Non-Deposition)
4/1/2021	Travis Close	0.3	\$850	\$255	Email to MTJ, GBW, RLS explaining hot doc found about lack of discretion in budgeting	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/1/2021	Travis Close	0.5	\$850	\$425	Review and analyze part 1 of Anna Reddy depo transcript (morning)	Depositions
4/1/2021	Travis Close	0.4	\$850	\$340	Email to Titan Legal re: coordinating pickup of subpoena'd docs received from City of San Diego	Discovery (Non-Deposition)
4/1/2021	Travis Close	0.4	\$850	\$340	Review and analyze prior communications with City of San Diego and subpoena vendor re: building records subpoenas	Discovery (Non-Deposition)
4/1/2021	Travis Close	1.4	\$850	\$1,190	Depo prep -- review and analysis of docs (2020 or more recent) from custodian Kelly Rubin of Service Alignment # BKD2844982-BKD2516514 (88-107 of 221)	Discovery (Non-Deposition)
4/1/2021	Travis Close	0.6	\$850	\$510	Analyze SA benchmarks questions/responses showing data for some, if not all of brookdale's CA facilities	Discovery (Non-Deposition)
4/1/2021	Travis Close	0.8	\$850	\$680	Depo prep -- review and analysis of docs (2020 or more recent) from custodian Kelly Rubin of Service Alignment # BKD2516514-BKD2516560 (107-122 of 221)	Discovery (Non-Deposition)
4/2/2021	Rachel Steyer	0.5	\$750	\$375	reviewing and reorganizing/classifying possible depo exhibits	Depositions
4/2/2021	Rachel Steyer	6.0	\$750	\$4,500	reviewing emails and documents in preparation for upcoming depo	Depositions
4/2/2021	Travis Close	1.1	\$850	\$935	Weekly doc review meeting w/ AX, GBW, MTJ, and staff attorneys re: upcoming depositions, topics to focus on in doc review, and motions to compel	Case Organization, Planning and Strategy
4/2/2021	Travis Close	0.6	\$850	\$510	Analyze resident file of Kathryn Smith (of Brookdale Murrieta) whose mother filed complaint re: understaffing	Case Organization, Planning and Strategy
4/2/2021	Travis Close	0.2	\$850	\$170	Email to RLS re: question about improperly redacted document	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/2/2021	Travis Close	0.8	\$850	\$680	Create chart for organizing recent emails/docs of upcoming deponents	Depositions
4/2/2021	Travis Close	1.0	\$850	\$850	Depo prep -- review/analysis of Dolcater emails from 9/2020 to present # BKD2321659-BKD2321771 (1-22 of 497)	Depositions
4/2/2021	Travis Close	1.4	\$850	\$1,190	Depo prep -- review/analysis of Dolcater emails from 9/2020 to present # BKD2321771-BKD2322036 (22-82 of 497)	Depositions
4/2/2021	Travis Close	0.3	\$850	\$255	Review and analyze third party Silversphere's objections and responses to subpoena to produce call pendant data	Depositions
4/2/2021	Travis Close	0.9	\$850	\$765	Depo prep -- review/analysis of Dolcater emails from 9/2020 to present # BKD2321659-BKD2328583 (92-108 of 497)	Discovery (Non-Deposition)
4/2/2021	Travis Close	0.3	\$850	\$255	Email to AXU re: responding to silverspheres' requests about defining dates of operation at BKD facilities	Discovery (Non-Deposition)
4/5/2021	Guy Wallace	0.3	\$1,350	\$405	com's with Waters re site inspections and results of same re D's designated accessible vans	Class Certification
4/5/2021	Guy Wallace	1.2	\$1,350	\$1,620	preparation of updated task list for class certification motion	Class Certification
4/5/2021	Guy Wallace	2.6	\$1,350	\$3,510	analysis of emails re Garner and preparation for depo	Depositions
4/5/2021	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re documents identified by document analysis team; D's extensive redactions based on privilege	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/5/2021	Guy Wallace	0.4	\$1,350	\$540	com's with Kennedy re potential retention as damages expert	Experts (Including Retention)
4/5/2021	Guy Wallace	0.6	\$1,350	\$810	analysis of potential expert re emergency evacuations referred by Seaborn	Experts (Including Retention)
4/5/2021	Guy Wallace	0.2	\$1,350	\$270	com's with Kailes re potential retention as expert	Experts (Including Retention)
4/5/2021	Guy Wallace	0.2	\$1,350	\$270	com's with KAS re settlement and com's with Charlie Lee	Settlement
4/5/2021	Mark Johnson	0.3	\$1,150	\$345	Calls (x2) w/ GBW re settlement inquires from Charlie Reed through Stebner; privilege and redaction issues	Case Organization, Planning and Strategy
4/5/2021	Mark Johnson	0.7	\$1,150	\$805	review emails and documents found by doc reviewers for potential depo exhibits.	Depositions
4/5/2021	Rachel Steyer	6.3	\$750	\$4,725	reviewing documents and emails in preparation for upcoming depositions	Depositions
4/5/2021	Rachel Steyer	0.2	\$750	\$150	reviewing emails and documents circulated by BFK and responding	Discovery (Non-Deposition)
4/5/2021	Travis Close	0.3	\$850	\$255	Review and analyze emails flagged by RAB re: facility ownership and contract labor	Case Organization, Planning and Strategy
4/5/2021	Travis Close	0.3	\$850	\$255	Email to team re: accessibility complaint from Mirage Inn resident	Case Organization, Planning and Strategy
4/5/2021	Travis Close	1.6	\$850	\$1,360	Depo prep -- review/analysis of Dolcater emails from 9/2020 to present # BKD2328583-BKD2321920 (108-165 of 497)	Depositions
4/5/2021	Travis Close	1.2	\$850	\$1,020	Depo prep -- review/analysis of Dolcater emails from 9/2020 to present # BKD2321920-BKD2837367 (165-218 of 497)	Depositions
4/6/2021	Guy Wallace	0.9	\$1,350	\$1,215	preparation of further task list re class certification motion	Class Certification
4/6/2021	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ re joint letter re Rule 30(b)(6) depositions	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/6/2021	Guy Wallace	1.4	\$1,350	\$1,890	review and analysis of documents for Garner deposition; com's with TCC; RLS; BFK re same	Depositions
4/6/2021	Guy Wallace	1.6	\$1,350	\$2,160	legal research and analysis re Rule 30(b)(6) issues, including issues raised in D's motion for protective order re same	Other Motions
4/6/2021	Guy Wallace	3.1	\$1,350	\$4,185	preparation and drafting of letter brief portion re Rule 30(b)(6) depo	Other Motions
4/6/2021	Guy Wallace	0.6	\$1,350	\$810	com's with KAS re settlement and com's with Charlie Lee	Settlement
4/6/2021	Mark Johnson	2.4	\$1,150	\$2,760	work on Dolcater depo outline and review of potential exhibit, emails re same	Depositions
4/6/2021	Mark Johnson	0.8	\$1,150	\$920	review and revise joint ltr brief re 30(b)(6) depositions and coms w/ GBW by email re same	Other Motions
4/6/2021	Rachel Steyer	0.3	\$750	\$225	reviewing emails and sharepoint to determine former contact/outreach with prospective class member declarant, updating GBW, TCC, MTJ	Class Outreach and Contact
4/6/2021	Rachel Steyer	0.7	\$750	\$525	reviewing and organizing documents and emails gathered by JMP corresponding to upcoming depo prep	Depositions
4/6/2021	Rachel Steyer	2.2	\$750	\$1,650	reviewing document production and gathering relevant documents in preparation for upcoming depositions	Depositions
4/6/2021	Travis Close	1.2	\$850	\$1,020	Review/analyze records on file for Marylen Naimark (including redacted emails) who complained at Murrieta facility for lack of accessible bathroom, sink, kitchen	Case Organization, Planning and Strategy
4/6/2021	Travis Close	0.4	\$850	\$340	Email to team re: how brookdale conducts pricing at its facilities	Case Organization, Planning and Strategy
4/6/2021	Travis Close	1.4	\$850	\$1,190	Depo prep -- review/analysis of Dolcater emails from 9/2020 to present # BKD2837367-BKD2841487 (218-287 of 497)	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/6/2021	Travis Close	1.3	\$850	\$1,105	Depo prep -- review/analysis of Dolcater emails from 9/2020 to present # BKD2841487-BKD2504024 (287-344 of 497)	Depositions
4/6/2021	Travis Close	1.2	\$850	\$1,020	Review and analyze records for "price per point" (re: Brookdale pricing at facilities)	Depositions
4/6/2021	Travis Close	0.9	\$850	\$765	Review and analyze records for Hargrove Jones (resident at San Marcos facility) who complained of neglect in 2019	Discovery (Non-Deposition)
4/7/2021	Guy Wallace	1.7	\$1,350	\$2,295	review and analysis of emails for depo preparation for Garner; Dolcater; Toomer depositions	Depositions
4/7/2021	Guy Wallace	0.4	\$1,350	\$540	com's with Kailes; Seaborn; Parks re potential emergency evacuation expert	Experts (Including Retention)
4/7/2021	Guy Wallace	0.3	\$1,350	\$405	com's with Kennedy re potential damages expert retention	Experts (Including Retention)
4/7/2021	Guy Wallace	2.4	\$1,350	\$3,240	preparation of hearing re Local Rule 7-11 Motion re case schedule; com's with MTJ re same (.6)	Other Motions
4/7/2021	Mark Johnson	0.6	\$1,150	\$690	review emails and documents from doc reviewers re evidence in support of class cert.	Class Certification
4/7/2021	Mark Johnson	0.4	\$1,150	\$460	call w/ AX re strategy for meeting and conferring w/ OC re pendant data	Discovery (Non-Deposition)
4/7/2021	Mark Johnson	0.2	\$1,150	\$230	finalize draft joint ltr brief re 30(b)(6) depo and email to OC GLM re same	Other Motions
4/7/2021	Mark Johnson	0.8	\$1,150	\$920	review prior meet and confer email history on pendant data and AX notes for meet and confer call, take notes for same	Other Motions
4/7/2021	Mark Johnson	0.6	\$1,150	\$690	meet and confer w/ OC and AX re pendant data production	Other Motions
4/7/2021	Mark Johnson	0.8	\$1,150	\$920	calls (x3) w/ GBW re planning for status conference with Court on class certification deadline	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/7/2021	Mark Johnson	0.3	\$1,150	\$345	further review and analysis of D statement in opposition to mtn to extend deadline for class cert motion filing	Other Motions
4/7/2021	Rachel Steyer	8.0	\$750	\$6,000	reviewing emails and documents in preparation for upcoming deposition, pulling and checking other secondary documents of interest	Depositions
4/7/2021	Travis Close	0.2	\$850	\$170	Call with MTJ re: assignments for near future	Case Organization, Planning and Strategy
4/7/2021	Travis Close	1.1	\$850	\$935	Review and analyze staffing complaints from post-2020	Case Organization, Planning and Strategy
4/7/2021	Travis Close	0.4	\$850	\$340	Review index of Jeffrey Toomer hot docs prepared by EPO for upcoming deposition	Depositions
4/7/2021	Travis Close	1.6	\$850	\$1,360	Depo prep -- review/analysis of Dolcater emails from 9/2020 to present # BKD2504024-BKD2504405 (344-398 of 497)	Discovery (Non-Deposition)
4/7/2021	Travis Close	1.4	\$850	\$1,190	Depo prep -- review/analysis of Dolcater emails from 9/2020 to present # BKD2504405-BKD2511362 (398-443 of 497)	Discovery (Non-Deposition)
4/7/2021	Travis Close	1.5	\$850	\$1,275	Depo prep -- review/analysis of Dolcater emails from 9/2020 to present # BKD2511362-BKD2511605 (443-497 of 497)	Discovery (Non-Deposition)
4/8/2021	Guy Wallace	0.5	\$1,350	\$675	com's with GG; MTJ re results of CMC with Judge Gilliam	Case Management Conferences
4/8/2021	Guy Wallace	2.1	\$1,350	\$2,835	review and analysis of D's opposition to P's Rule 7-11 motion; preparation of notes re CMC and potential areas of argument	Case Management Conferences
4/8/2021	Guy Wallace	0.1	\$1,350	\$135	CMC with Judge Gilliam re schedule on class certification	Case Management Conferences

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/8/2021	Guy Wallace	0.5	\$1,350	\$675	com's with GG (x2) re preparation for CMC; results of same	Case Management Conferences
4/8/2021	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re Marks and preparation of staffing analysis	Class Certification
4/8/2021	Guy Wallace	0.6	\$1,350	\$810	review and analysis of ED depo testimony	Depositions
4/8/2021	Guy Wallace	0.7	\$1,350	\$945	review and analysis of documents and categories of documents that may require an MTC; com's with MTJ re same	Other Motions
4/8/2021	Guy Wallace	0.3	\$1,350	\$405	com's with TCC re prior MTCs and areas of same	Other Motions
4/8/2021	Mark Johnson	1.1	\$1,150	\$1,265	calls w/GBW (x4) re planning for discovery mtns and document demands following status conference w/ Judge Gilliam	Discovery (Non-Deposition)
4/8/2021	Mark Johnson	0.8	\$1,150	\$920	coms w/ GBW (x2) re prep for status conference w/ court on mtn for extension of time to file class cert mtn	Other Motions
4/8/2021	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW and GCG re impact of status conference w/ Judge Gilliam and plans going forward re follow up on RFPs and motions to compel	Other Motions
4/8/2021	Mark Johnson	2.0	\$1,150	\$2,300	prep for status conference w/ Judge Gilliam, including review of meet and confer history, ESI, dates of service of RFPs, notes/memos re same	Other Motions
4/8/2021	Mark Johnson	1.5	\$1,150	\$1,725	draft memo/list of outstanding discovery issues and status for mtg re discovery action items.	Other Motions
4/8/2021	Rachel Steyer	5.6	\$750	\$4,200	reviewing documents and production in preparation for upcoming deposition	Depositions
4/8/2021	Travis Close	1.7	\$850	\$1,445	Analyze all motions to compel filed by Ps; summarize and chart for today's hearing	Case Organization, Planning and Strategy
4/8/2021	Travis Close	0.2	\$850	\$170	Call with GBW re: preparing for today's meeting with judge gilliam	Class Certification
4/9/2021	Guy Wallace	0.7	\$1,350	\$945	preparation for conference with team re document analysis and preparation for class certification motion	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/9/2021	Guy Wallace	1.1	\$1,350	\$1,485	preparation of outline of SOF for class cert brief	Class Certification
4/9/2021	Guy Wallace	1.1	\$1,350	\$1,485	team ZOOM re document analysis and preparation for class certification	Class Certification
4/9/2021	Guy Wallace	0.5	\$1,350	\$675	com's with RLS re preparation of putative class members declarations; preparation for Garner depo	Class Certification
4/9/2021	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ re benchmarks and customization and advanced customization	Class Certification
4/9/2021	Guy Wallace	0.8	\$1,350	\$1,080	preparation of topics for Garner depo; review of potential email exhibits re same	Depositions
4/9/2021	Guy Wallace	0.3	\$1,350	\$405	com's with Maatman; AX; MTJ re discovery issues re Rule 30(b)(6) depositions and pendant data	Discovery (Non-Deposition)
4/9/2021	Guy Wallace	0.9	\$1,350	\$1,215	com's with Marks; Thornton; GG; MTJ re staffing analysis and Brookdale's task times	Experts (Including Retention)
4/9/2021	Mark Johnson	0.8	\$1,150	\$920	team zoom meetng re status of doc gathering for depo exhibits, JND residency agreement analysis, identification of missng documents or categories of documents requiring follow up.	Case Organization, Planning and Strategy
4/9/2021	Mark Johnson	0.2	\$1,150	\$230	review D email with proposal for production of pendant data; coms w/ AX re same	Discovery (Non-Deposition)
4/9/2021	Mark Johnson	0.3	\$1,150	\$345	review and respond to Maatman email re 30b6 joint discovery letter, stip re extension of clas certification deadline	Discovery (Non-Deposition)
4/9/2021	Mark Johnson	1.4	\$1,150	\$1,610	GTM call with GBW, Thornton, Marks re data for staffing analysis, norms, follow up for additional information and data from Brookdale	Experts (Including Retention)
4/9/2021	Mark Johnson	1.8	\$1,150	\$2,070	revisions to joint discovery ltr re 30b6 depo; draft emails to OC re same	Other Motions
4/9/2021	Mark Johnson	0.2	\$1,150	\$230	finalize stip and proposed order re class cert deadline, com w/ staff re same	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/9/2021	Rachel Steyer	0.4	\$750	\$300	phone call w/GBW to discuss ongoing depo prep, class member declaration drafting	Case Organization, Planning and Strategy
4/9/2021	Rachel Steyer	0.9	\$750	\$675	meeting with Brookdale team and cocounsel to discuss ongoing document review in preparation for upcoming depositions, prep for class certification	Case Organization, Planning and Strategy
4/9/2021	Rachel Steyer	0.5	\$750	\$375	call w/TRB to discuss and review strategy for finalizing declarations	Class Outreach and Contact
4/9/2021	Rachel Steyer	3.5	\$750	\$2,625	reviewing gathered documents, beginning to re review and draft depo prep outline for eventual review by GBW	Depositions
4/9/2021	Travis Close	0.2	\$850	\$170	Email to MTJ re: SA talking points	Case Organization, Planning and Strategy
4/9/2021	Travis Close	1.1	\$850	\$935	Team meeting re: class cert strategy following yesterday's hearing and 90-day extension	Class Certification
4/9/2021	Travis Close	1.4	\$850	\$1,190	Analyze and update master discovery spreadsheet to reflect 30(b)(6) depo topics	Class Certification
4/9/2021	Travis Close	0.8	\$850	\$680	Analyze discovery requests/responses related to personnel reports	Class Certification
4/9/2021	Travis Close	0.7	\$850	\$595	Analyze discovery requests, responses, and history re: pendant usage data	Class Certification
4/9/2021	Travis Close	0.9	\$850	\$765	Review and analyze sample pendant data response sheets to determine how to calculate response time	Class Certification
4/9/2021	Travis Close	0.8	\$850	\$680	Analyze discovery requests, responses, history, and status re: task time studies	Class Certification
4/9/2021	Travis Close	0.2	\$850	\$170	Email to RAB re: status of task times production	Discovery (Non-Deposition)
4/10/2021	Mark Johnson	0.2	\$1,150	\$230	review and propose edits to AX email response to GLM email re willingness to produce pendant data.	Discovery (Non-Deposition)
4/11/2021	Guy Wallace	2.3	\$1,350	\$3,105	preparation of outline of class certification brief	Class Certification
4/11/2021	Guy Wallace	3.3	\$1,350	\$4,455	preparation of list of categories of documents and particular documents that have not been produced	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/11/2021	Rachel Steyer	1.0	\$750	\$750	devising and drafting depo prep outline, reviewing pulled documents to determine which ones to use, strategy for depo	Depositions
4/12/2021	Guy Wallace	4.4	\$1,350	\$5,940	preparation of topics and questions for Garner and Dolcater depositions; review and analysis of potential exhibits re same	Depositions
4/12/2021	Guy Wallace	0.9	\$1,350	\$1,215	com's with Kailes re potential expert re emergency evacuation	Experts (Including Retention)
4/12/2021	Guy Wallace	0.9	\$1,350	\$1,215	revise and edit MTC re Rule 30(b)(6) depositions; com's with MTJ re same	Other Motions
4/12/2021	Mark Johnson	0.9	\$1,150	\$1,035	calls w/ GBW (x4) re docs and emails re service alignment and potential exhibits for Doclater / Garner depos	Depositions
4/12/2021	Mark Johnson	3.0	\$1,150	\$3,450	work on depo outline and review docs for Doclater depo	Depositions
4/12/2021	Mark Johnson	0.1	\$1,150	\$115	com w/ Jim Thornton re floorplans and coms w/ staff re same	Experts (Including Retention)
4/12/2021	Mark Johnson	0.1	\$1,150	\$115	review and respond to email from GLM re 30b6 depo dispute	Other Motions
4/12/2021	Mark Johnson	0.8	\$1,150	\$920	revise, format and finalize further draft of 30b6 depo joint letter brief	Other Motions
4/12/2021	Mark Johnson	0.2	\$1,150	\$230	coms w/ GBW re responding to GLM email and revised version of joint ltr brief re 30b6 depo	Other Motions
4/12/2021	Rachel Steyer	0.3	\$750	\$225	email response to TAH to answer questions about communications with class member	Class Outreach and Contact
4/12/2021	Rachel Steyer	0.3	\$750	\$225	phone call w/fiduciary of class member, explained case	Class Outreach and Contact
4/12/2021	Rachel Steyer	7.5	\$750	\$5,625	ongoing reviewing of already gathered documents and drafting/preparing depo outline	Depositions
4/12/2021	Rachel Steyer	0.3	\$750	\$225	email to GBW with depo prep outline so far	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/12/2021	Rachel Steyer	0.2	\$750	\$150	reviewing communications internally regarding relevant documents and requests for reports	Discovery (Non-Deposition)
4/12/2021	Travis Close	0.8	\$850	\$680	Analyze RFPs responsive to labor variance reports and history	Case Organization, Planning and Strategy
4/12/2021	Travis Close	1.4	\$850	\$1,190	Analyze RFPs requesting labor detail reports, history, and status	Case Organization, Planning and Strategy
4/12/2021	Travis Close	0.5	\$850	\$425	Analyze how variance info is communicated to BKD leadership -- income statement variance v. labor detail report	Case Organization, Planning and Strategy
4/12/2021	Travis Close	0.2	\$850	\$170	Email to BFK re: question about labor detail reports and variance analyses	Case Organization, Planning and Strategy
4/12/2021	Travis Close	0.6	\$850	\$510	Search results for "double dipping" as a guideline for managing labor	Class Certification
4/12/2021	Travis Close	1.1	\$850	\$935	Analyze RFPs responsive to other labor and staffing related reports, history of M/C discussions, and current status	Class Certification
4/12/2021	Travis Close	0.4	\$850	\$340	Email to BKF, MTJ, GBW re: brookdale variance reports	Discovery (Non-Deposition)
4/13/2021	Guy Wallace	4.4	\$1,350	\$5,940	review and analysis of exhibits for Toomer/Garner depositions re Service Alignment and labor management	Depositions
4/13/2021	Guy Wallace	0.7	\$1,350	\$945	review and analysis of potential exhibits for Garner deposition identified in draft outline from RLS	Depositions
4/13/2021	Guy Wallace	1.2	\$1,350	\$1,620	legal research and analysis re D's duties under California Health and Safety Code and 22 CCR regulations re plan of operation; identification of residents with ambulatory issues; safety	Misc. Research
4/13/2021	Guy Wallace	0.3	\$1,350	\$405	revise and edit final draft of Rule 30(b)(6) depo notice	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/13/2021	Mark Johnson	1.0	\$1,150	\$1,150	review emails and attached documents from COC re docuemnts found in production and potential exhibits coms re use of particular documents	Depositions
4/13/2021	Mark Johnson	2.8	\$1,150	\$3,220	work on depo outline for Dolcater and review documents for same.	Depositions
4/13/2021	Mark Johnson	2.0	\$1,150	\$2,300	search for and review docs re SA history for Docater depo prep	Depositions
4/13/2021	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re 30b6 joint discovery ltr and edits o same	Other Motions
4/13/2021	Mark Johnson	0.6	\$1,150	\$690	review GBW edits to 30b6 joint letter; prepare redline and coms w/ OC re same	Other Motions
4/13/2021	Rachel Steyer	0.5	\$750	\$375	response to cocounsel in preparation for upcoming ED depo, providing follow up questions to ask re document, provided additional potential exhibits for review	Depositions
4/13/2021	Travis Close	0.7	\$850	\$595	Research emails from productions spanning BKD2173580 - 2882038 re: discussions of class actions lawsuits	Case Organization, Planning and Strategy
4/13/2021	Travis Close	0.2	\$850	\$170	Email to JY re: sharing hot document in prep for Kevin Bowman depo	Case Organization, Planning and Strategy
4/13/2021	Travis Close	0.2	\$850	\$170	Email to BBK (co-counsel) re: email from ED describing class action lawsuit	Class Certification
4/13/2021	Travis Close	1.7	\$850	\$1,445	Search for results related to "class action" or "lawsuit" to find emails discussing our lawsuit in the context of staffing or ADA concerns	Class Certification
4/13/2021	Travis Close	0.4	\$850	\$340	Review today's hot documents found by JMP re: PSS analysis, staffing, employee training	Class Certification
4/13/2021	Travis Close	0.2	\$850	\$170	Analyze status of claims for class member bradley drake	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/13/2021	Travis Close	0.2	\$850	\$170	Email to Bradley drake re: not currently listed as an eligible class member and providing Admin's contact info	Class Outreach and Contact
4/13/2021	Travis Close	0.3	\$850	\$255	Review and analyze draft memo re: improper withholding of communications in privilege log by AX	Discovery (Non-Deposition)
4/13/2021	Travis Close	0.5	\$850	\$425	Analyze Ds' clawback privilege log and supplemental privilege log for info re: potential plaintiffs	Discovery (Non-Deposition)
4/13/2021	Travis Close	1.4	\$850	\$1,190	Analyze discovery category of norms and docs describing assumptions for scheduling purposes to identify requests to which responsive, history, and status	Discovery (Non-Deposition)
4/13/2021	Travis Close	0.9	\$850	\$765	Analyze discovery categories of training materials & training records to identify requests to which responsive, history, and status	Discovery (Non-Deposition)
4/13/2021	Travis Close	0.8	\$850	\$680	Analyze RFPs responsive to topic of CMIPS and bonus-related documents, history and status of efforts to obtain this discovery	Discovery (Non-Deposition)
4/14/2021	Guy Wallace	2.9	\$1,350	\$3,915	review and analysis of potential exhibits for Garner depo re Service Alignment; benchmarks; monitoring and discipline re same; labor budgets and management; ADA access issues	Depositions
4/14/2021	Guy Wallace	0.8	\$1,350	\$1,080	com's with RLS re preparation of topics, questions and exhibits for Garner depo	Depositions
4/14/2021	Guy Wallace	2.3	\$1,350	\$3,105	com's with MTJ; TCC; RLS re documents and categories of documents that are significant and that have not been produced by Defendants; next steps re same	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/14/2021	Mark Johnson	5.5	\$1,150	\$6,325	continue reviewing docs for depo prep and work on Dolcater depo outline; search for and review SA docs and review docs from coc re enforcement of benchmarks, etc.	Depositions
4/14/2021	Mark Johnson	2.0	\$1,150	\$2,300	zoom mtg w/ GBW, TCC, RLS re identification of documents not produced and strategy for obtaining them.	Discovery (Non-Deposition)
4/14/2021	Mark Johnson	0.1	\$1,150	\$115	review OC GLM email re pendent data production and email to AX re sufficiency of offer	Discovery (Non-Deposition)
4/14/2021	Rachel Steyer	0.7	\$750	\$525	email response to GBW answering various questions in preparation for upcoming depo, sending documents requested	Depositions
4/14/2021	Rachel Steyer	4.0	\$750	\$3,000	reviewing ongoing documents being circulated internally, updating depo prep outline	Depositions
4/14/2021	Rachel Steyer	2.1	\$750	\$1,575	meeting with GBW, TCC, MTJ to review outstanding discovery action items	Discovery (Non-Deposition)
4/14/2021	Rachel Steyer	0.2	\$750	\$150	reviewing and extracting 2017 record retention policy, sending to TCC, MTJ, GBW	Discovery (Non-Deposition)
4/14/2021	Travis Close	0.2	\$850	\$170	Review records retention policy shared by RLS	Case Organization, Planning and Strategy
4/14/2021	Travis Close	2.1	\$850	\$1,785	Call with RLS, GBW, MTJ re: strategy for omnibus motion to compel/joint letter (missing kronos data, job descriptions, training records, task times, etc)	Discovery (Non-Deposition)
4/14/2021	Travis Close	0.8	\$850	\$680	Analyze doc requests responsive to emergency evac & transportation plans, history and status	Discovery (Non-Deposition)
4/14/2021	Travis Close	0.9	\$850	\$765	Analysis of doc requests responsive to ED performance reviews and corrective actions, history, and current status of M/C	Discovery (Non-Deposition)
4/14/2021	Travis Close	0.6	\$850	\$510	Analysis of discovery requests responsive to policy and procedue manuals other than clinical services	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/14/2021	Travis Close	0.5	\$850	\$425	Identify other responsive documents to follow up on in demanding from recent productions	Discovery (Non-Deposition)
4/14/2021	Travis Close	0.3	\$850	\$255	Review daily hot docs found by JMP (corrective actions, resident staffing concerns, SA best practices, etc)	Discovery (Non-Deposition)
4/15/2021	Guy Wallace	2.3	\$1,350	\$3,105	review and analysis of documents and potential exhibits re staffing; discipline of EDs for failing to follow benchmarks; training	Depositions
4/15/2021	Guy Wallace	1.8	\$1,350	\$2,430	preparation for depo of Garner, including issues re transportation and topics, questions and exhibits re same; com's with Waters re same (.3)	Depositions
4/15/2021	Guy Wallace	0.9	\$1,350	\$1,215	com's with RLS; CC; BFK re preparation for Garner depo and questions and exhibits re same	Depositions
4/15/2021	Guy Wallace	0.8	\$1,350	\$1,080	com's with MTJ re preparation for Dolcater; Garner depositions; motions to compel re task time documents, staffing formula, training documents	Depositions
4/15/2021	Guy Wallace	0.7	\$1,350	\$945	analysis of issues re community customization; advanced customization re benchmarks	Depositions
4/15/2021	Mark Johnson	8.0	\$1,150	\$9,200	work on Doclater depo outline, including doc review, coms w/ COC re findings in docs, strategy	Depositions
4/15/2021	Mark Johnson	0.2	\$1,150	\$230	review and respond to AX email re pendant data production proposal from OC	Discovery (Non-Deposition)
4/15/2021	Mark Johnson	0.2	\$1,150	\$230	review and respond to email from Marks re issues with new assessment data	Experts (Including Retention)
4/15/2021	Rachel Steyer	0.6	\$750	\$450	phone call w/class member fiduciary and care manager to discuss potential intake/declaration	Class Outreach and Contact
4/15/2021	Rachel Steyer	0.4	\$750	\$300	phone call w/GBW to discuss depo prep	Depositions
4/15/2021	Rachel Steyer	4.9	\$750	\$3,675	ongoing work with SHeila Garner depo prep outline and reviewing documents	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/15/2021	Rachel Steyer	0.2	\$750	\$150	response to TCC, GBW, MTJ regarding status of outstanding discovery action items	Discovery (Non-Deposition)
4/15/2021	Travis Close	1.1	\$850	\$935	Analyze the Operations Onboarding Guide (Aug of 2020) for a list of pertinent courses we still need to demand from defendants	Case Organization, Planning and Strategy
4/15/2021	Travis Close	0.2	\$850	\$170	Email to RAB re: records received from City of San Diego	Case Organization, Planning and Strategy
4/15/2021	Travis Close	1.3	\$850	\$1,105	Review organizational charts and analyze for which positions we still need job descriptions	Case Organization, Planning and Strategy
4/15/2021	Travis Close	0.9	\$850	\$765	Analysis of actions to be taken to demand records of algorithms underlying the benchmarks	Class Certification
4/15/2021	Travis Close	0.5	\$850	\$425	Review MTJ's analysis on SA 1.0, 2.0, 3.0 (progression) and characteristics of each, with attached docs	Discovery (Non-Deposition)
4/15/2021	Travis Close	0.4	\$850	\$340	Review analysis of RAB re: action plans and consequences for associates for bad performance at facilities	Discovery (Non-Deposition)
4/15/2021	Travis Close	1.3	\$850	\$1,105	Prepare list of action items to move on for additional discovery, following yesterday's meeting and summarization of notes	Discovery (Non-Deposition)
4/16/2021	Guy Wallace	1.1	\$1,350	\$1,485	ZOOM planning meeting re preparation for senior official depositions and class certification	Class Certification
4/16/2021	Guy Wallace	1.4	\$1,350	\$1,890	review and analysis of D's emergency evacuation policies and plans	Class Certification
4/16/2021	Guy Wallace	0.3	\$1,350	\$405	com's with RAB re analysis of documents and preparation for depositions and class certification motion	Class Certification
4/16/2021	Guy Wallace	3.9	\$1,350	\$5,265	preparation of topics, questions and potential exhibits for Garner depo	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/16/2021	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ re preparation for Dolcater and Garner depositions and D's benchmarks and how they are calculated	Depositions
4/16/2021	Guy Wallace	0.8	\$1,350	\$1,080	com's with RLS; CC re preparation for Garner deposition	Depositions
4/16/2021	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of TCC memo re RFPs that require meet and confer and MTC's; identification of potential additional items re same	Discovery (Non-Deposition)
4/16/2021	Guy Wallace	0.6	\$1,350	\$810	revise and edit draft MTC re D's task time studies, norms and service alignment (SA) benchmarks	Other Motions
4/16/2021	Mark Johnson	1.3	\$1,150	\$1,495	team zoom meeting re progress on targeted searches and reviews of docs fo Doclater, Garner, Toomer and Bowman depositions, documents that need to be produced still and potetial motions to compel	Depositions
4/16/2021	Mark Johnson	1.5	\$1,150	\$1,725	review and analyze norms and benchmark spreadhseets and otehr documents for potential use in Doclater depo	Depositions
4/16/2021	Mark Johnson	0.8	\$1,150	\$920	calls w/ GBW (x4) re document review for depo exhibits, potential motions to compel, issues/topics for Dolcater / Garner depositions, Brookdale norms, benchmarks, service alignment	Depositions
4/16/2021	Mark Johnson	4.5	\$1,150	\$5,175	draft section of joint discovery ltr re task time studies, norms, other elements of benchmarks	Other Motions
4/16/2021	Rachel Steyer	1.3	\$750	\$975	meeting with Eidler team and co-counsel to discuss ongoing case planning, strategy, class cert efforts	Case Organization, Planning and Strategy
4/16/2021	Rachel Steyer	0.3	\$750	\$225	phone call w/GBW to discuss documents pertaining to emergency evacuations	Depositions
4/16/2021	Rachel Steyer	1.6	\$750	\$1,200	reviewing documents related to emergency evacuation policies	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/16/2021	Rachel Steyer	2.6	\$750	\$1,950	ongoing review of Sheila Garner related documents in preparation for upcoming depo, adding to depo prep outline and sharing with GBW	Depositions
4/16/2021	Rachel Steyer	0.2	\$750	\$150	email to GBW documenting review of emergency evacuation policies and DSS forms	Discovery (Non-Deposition)
4/16/2021	Travis Close	1.1	\$850	\$935	Revise list of discovery to demand from Defendants before class cert	Case Organization, Planning and Strategy
4/16/2021	Travis Close	0.3	\$850	\$255	Call with GBW re: strategy for upcoming class cert deadlines	Case Organization, Planning and Strategy
4/16/2021	Travis Close	0.4	\$850	\$340	Analyze earlier charts produced showing status of current facilities, and ways to update	Case Organization, Planning and Strategy
4/16/2021	Travis Close	0.7	\$850	\$595	Legal research re: requirements of section 87208 and facility plans of operation	Case Organization, Planning and Strategy
4/16/2021	Travis Close	0.3	\$850	\$255	Email to team re: draft of list of discovery to demand from Def's to team for review	Class Certification
4/16/2021	Travis Close	1.4	\$850	\$1,190	Weekly doc review & class cert strategy team meeting, discussing depo prep and upcoming motions to compel	Class Certification
4/16/2021	Travis Close	0.2	\$850	\$170	Email to KS (co-counsel) re: charts showing current and former facilities, and instructions for making determination and updates	Class Certification
4/16/2021	Travis Close	0.3	\$850	\$255	Email to GBW re: tracking and collecting facility plans of operation	Class Certification
4/16/2021	Travis Close	0.3	\$850	\$255	Revisions to GBW draft of list of training materials still needed from Orientation spreadsheet	Class Certification
4/16/2021	Travis Close	0.2	\$850	\$170	Review and analyze summary by BBK re: today's deposition	Depositions
4/16/2021	Travis Close	1.4	\$850	\$1,190	Review and analyze facility Plans of Operation in DSS files (third party) already production	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/16/2021	Travis Close	0.2	\$850	\$170	Email to JMD, JMP, and BFK re: sharing recent hot docs found by Rhonda Dolcater	Discovery (Non-Deposition)
4/16/2021	Travis Close	0.3	\$850	\$255	Call with AX (co-counsel) re question about privilege log	Discovery (Non-Deposition)
4/17/2021	Mark Johnson	4.5	\$1,150	\$5,175	work on Doclater depo outline, reveiw docs for same, emails to/from co-counsel and doc reviewers.	Depositions
4/18/2021	Guy Wallace	5.8	\$1,350	\$7,830	preparation of topics, questions and potential exhibits for Garner and Dolcater depositions	Depositions
4/18/2021	Guy Wallace	0.7	\$1,350	\$945	com's with JY; MTJ; RLS re preparation for Dolcater; Garner; Bowman depositions	Depositions
4/18/2021	Mark Johnson	9.0	\$1,150	\$10,350	work on depo prep for Dolcater (and others)- review docs, add to outline; calls w/ GBW re docs and strategies; review docs and emails from doc reviewers	Depositions
4/18/2021	Mark Johnson	0.3	\$1,150	\$345	drafr emails to OC re outstanding job decritions and org charts	Discovery (Non-Deposition)
4/18/2021	Rachel Steyer	1.0	\$750	\$750	ongoing review of documents and continuing document review and searches as part of depo prep	Depositions
4/19/2021	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re preparation for Dolcater depo	Depositions
4/19/2021	Guy Wallace	0.8	\$1,350	\$1,080	com's with RLS re preparation for Garner depo and outline for same	Depositions
4/19/2021	Guy Wallace	0.5	\$1,350	\$675	com's with TCC; CC re potential exhibits for use in Dolcater and Garner depositions	Depositions
4/19/2021	Guy Wallace	6.8	\$1,350	\$9,180	preparation of topics; questions and exhibits for Garner depo	Depositions
4/19/2021	Mark Johnson	9.5	\$1,150	\$10,925	pepare for Doclater depo - review docs, continue drafting outline, coms w/ GBW and doc review staff and RLS re same	Depositions
4/19/2021	Rachel Steyer	0.3	\$750	\$225	updating master exhibit tracking spreadsheet	Case Organization, Planning and Strategy
4/19/2021	Rachel Steyer	0.8	\$750	\$600	phone call w/GBW to discuss depo prep	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/19/2021	Rachel Steyer	1.5	\$750	\$1,125	reviewing additional documents in preparation for upcoming depo	Depositions
4/19/2021	Travis Close	0.9	\$850	\$765	Review and analyze rough draft of depo transcript for Ferdinand Buot (taken by BBK)	Case Organization, Planning and Strategy
4/19/2021	Travis Close	1.1	\$850	\$935	Prep for discovery motion -- analyze meet and confer efforts re: accessible transportation policies	Case Organization, Planning and Strategy
4/19/2021	Travis Close	1.6	\$850	\$1,360	Prep for discovery motion -- analyze meet and confer efforts re: emergency evacuation policies and procedures	Case Organization, Planning and Strategy
4/19/2021	Travis Close	0.9	\$850	\$765	Depo prep -- review and analyze all quick reference guides received referring to benchmarks and staffing	Depositions
4/19/2021	Travis Close	1.3	\$850	\$1,105	Depo prep -- review/analyze docs describing relationship of benchmark to staffing	Discovery (Non-Deposition)
4/20/2021	Guy Wallace	1.4	\$1,350	\$1,890	review and analysis of draft of Dolcater depo outline; com's with MTJ re same	Depositions
4/20/2021	Guy Wallace	0.9	\$1,350	\$1,215	com's with MTJ re preparation for Dolcater and Garner depositions	Depositions
4/20/2021	Guy Wallace	0.6	\$1,350	\$810	com's with RLS; CC re preparation for Garner depo	Depositions
4/20/2021	Guy Wallace	5.7	\$1,350	\$7,695	preparation of topics, questions and exhibits for Garner depo	Depositions
4/20/2021	Mark Johnson	11.0	\$1,150	\$12,650	prep for Dolcater depo, including addiing to outline and revisiong, coms w/GBW and staff re docs and lines of examination, coms w/ RLS re exhibits, organize same; review spreadsheets	Depositions
4/20/2021	Rachel Steyer	0.2	\$750	\$150	quick review of organizational charts in current Brookdale folders	Depositions
4/20/2021	Rachel Steyer	0.8	\$750	\$600	email to MTJ compiling additional documents for depo	Depositions
4/20/2021	Rachel Steyer	0.2	\$750	\$150	email to MTJ re coordinating exhibits and question about order	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/20/2021	Rachel Steyer	2.3	\$750	\$1,725	reviewing, gathering, and organizing exhibits for MTJ	Depositions
4/20/2021	Rachel Steyer	1.6	\$750	\$1,200	reviewing and organizing documents in preparatino for MTJ depo	Depositions
4/20/2021	Rachel Steyer	0.3	\$750	\$225	reviewing document circulated by CAC re medical policies and forms	Discovery (Non-Deposition)
4/20/2021	Travis Close	0.5	\$850	\$425	Review and analyze Brookdale's record retention policy for matches to time studies	Case Organization, Planning and Strategy
4/20/2021	Travis Close	0.3	\$850	\$255	Email to MTJ, RLS, and GBW re: 2017 record retention policy	Case Organization, Planning and Strategy
4/20/2021	Travis Close	1.4	\$850	\$1,190	Legal research re: validity of company record retention policies in discovery disputes	Case Organization, Planning and Strategy
4/20/2021	Travis Close	1.1	\$850	\$935	Analyze Brookdale's history of 10-Ks (annual reports) during class period to determine changes of language re ADA compliance	Class Certification
4/20/2021	Travis Close	0.2	\$850	\$170	Email to team re: chart showing differences in language in 10-ks over time regarding ADA	Class Certification
4/20/2021	Travis Close	0.9	\$850	\$765	Legal research re: burdens on parties in discovery to disclose why they have not been able to locate documents requested	Discovery (Non-Deposition)
4/20/2021	Travis Close	0.3	\$850	\$255	Review documents/emails shared by CAC re: pressure to increase NOI and occupancy at facilities	Discovery (Non-Deposition)
4/21/2021	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ; RLS re Dolcater depo testimony	Depositions
4/21/2021	Guy Wallace	4.1	\$1,350	\$5,535	preparation of topics, questions and potential exhibits for Garner depo	Depositions
4/21/2021	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re preparation for hearing with MJ Beeler re Rule 30(b)(6) depo issues	Other Motions
4/21/2021	Mark Johnson	0.8	\$1,150	\$920	call w GBW re planning and strarefy for hearing re 30(b)(6) deposition; issues that came up in Dolcater depo; potential additional discovery disputes	Case Organization, Planning and Strategy
4/21/2021	Mark Johnson	0.2	\$1,150	\$230	debriefing w/ GBW, RLS re Dolcater depo	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/21/2021	Mark Johnson	7.0	\$1,150	\$8,050	Deposition of Rhonda Dolcater	Depositions
4/21/2021	Mark Johnson	1.0	\$1,150	\$1,150	prep and set-up for Dolcater depo and coms w/ RLS, Brendan K re exhibits and potential exhibits	Depositions
4/21/2021	Rachel Steyer	0.2	\$750	\$150	phone call w/GBW and MTJ following depo	Depositions
4/21/2021	Rachel Steyer	7.2	\$750	\$5,400	attended and assisted MTJ with deposition	Depositions
4/21/2021	Rachel Steyer	0.3	\$750	\$225	document review and searches for MTJ depo	Depositions
4/21/2021	Travis Close	0.2	\$850	\$170	Email to RLS re: question about CCRC community testimony in Dolcater depo	Case Organization, Planning and Strategy
4/21/2021	Travis Close	0.2	\$850	\$170	Email to MTJ, RLS re: benchmark setup responses	Case Organization, Planning and Strategy
4/22/2021	Guy Wallace	0.4	\$1,350	\$540	preparation of questions and exhibits for deposition of Garner	Depositions
4/22/2021	Guy Wallace	0.6	\$1,350	\$810	com's with GG; MTJ re Order re Rule 30(b)(6) order and discovery tasks	Discovery (Non-Deposition)
4/22/2021	Guy Wallace	0.3	\$1,350	\$405	preparation for hearing with MJ Beeler re Rule 30(b)(6) depositions	Other Motions
4/22/2021	Guy Wallace	0.3	\$1,350	\$405	hearing with MJ Beeler re Rule 30(b)(6) depositions	Other Motions
4/22/2021	Guy Wallace	0.2	\$1,350	\$270	review and analysis of Order from MJ Beeler re Rule 30(b)(6) depositions	Other Motions
4/22/2021	Mark Johnson	0.5	\$1,150	\$575	conference call w/ GBW, GCG re results of discovery hearing, next steps for 30b6 depositions and other depositions based on testimony to date, other discovery related and class cert related issues.	Case Organization, Planning and Strategy
4/22/2021	Mark Johnson	3.4	\$1,150	\$3,910	review Toomer emails and begin revising depo outline, identifying exhibits	Depositions
4/22/2021	Mark Johnson	0.3	\$1,150	\$345	discvoer hearing re 30b6 depo	Discovery (Non-Deposition)
4/22/2021	Mark Johnson	0.3	\$1,150	\$345	review original document requests re scope of request on certain subjects, notes re same and re request to follow up on	Discovery (Non-Deposition)
4/22/2021	Mark Johnson	0.2	\$1,150	\$230	call from GBW re issues for hearing on 30b6 depositions	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/22/2021	Rachel Steyer	0.2	\$750	\$150	email response to class member updating her about status of case and finalizing declaration	Class Outreach and Contact
4/22/2021	Rachel Steyer	5.8	\$750	\$4,350	creating new spreadsheet to track and review all documents in preparation for Garner depo	Depositions
4/22/2021	Travis Close	1.8	\$850	\$1,530	Begin drafting motion to compel re: budget variance reports (outline, background, negotiation history)	Case Organization, Planning and Strategy
4/22/2021	Travis Close	1.2	\$850	\$1,020	Depo follow-up -- search for and analyze role of Susan Persch in the Service Alignment 1.0, 2.0, and 3.0 rollouts	Depositions
4/22/2021	Travis Close	1.5	\$850	\$1,275	Analyze history of negotiations and M/C efforts for budget variance reports	Discovery (Non-Deposition)
4/22/2021	Travis Close	0.8	\$850	\$680	Depo prep -- search for evidence of the Brookdale Norms being generated by the IT department	Discovery (Non-Deposition)
4/22/2021	Travis Close	0.7	\$850	\$595	Analyze past meet and confer efforts regarding production of facility budgets	Discovery (Non-Deposition)
4/22/2021	Travis Close	0.2	\$850	\$170	Review/analyze hot docs found and shared by JMP re: bonus incentive spreadsheets and plans of correction	Discovery (Non-Deposition)
4/23/2021	Guy Wallace	2.7	\$1,350	\$3,645	review and analysis of D's various training documents and policies re Service Alignment; analysis of key points for class certification	Class Certification
4/23/2021	Guy Wallace	0.9	\$1,350	\$1,215	com's with MTJ re documents and categories of documents to demand from Defendants re staffing policies and procedures, emergency evacuation, operations plans, official depositions	Class Certification
4/23/2021	Guy Wallace	0.7	\$1,350	\$945	prepare for and participate in ZOOM with GG; BBK; JY; AX; MTJ; TCC; RLS re preparation for depositions; discovery issues; assignment of MTCs re categories of items not produced by Defendants	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/23/2021	Guy Wallace	0.9	\$1,350	\$1,215	com's with GG; JY; MTJ; RAB re depositions of Bowman; Toomer and whether D's have made a sufficient production of emails re same	Depositions
4/23/2021	Guy Wallace	0.3	\$1,350	\$405	review and analysis of D's supplemental interrogatory responses	Discovery (Non-Deposition)
4/23/2021	Guy Wallace	0.7	\$1,350	\$945	preparation of strategy re MTC's	Other Motions
4/23/2021	Mark Johnson	0.9	\$1,150	\$1,035	call w/ GBW re outstanding diiscovery issues, motions to compel, infor needed for stafing analysis, deposition strategies	Case Organization, Planning and Strategy
4/23/2021	Mark Johnson	0.8	\$1,150	\$920	document review team mtg w/ AX, KS, JP, TCC, GBW,EO, RB re doc review projects for Toomer/Bowman depositions and more generally for class certfication	Depositions
4/23/2021	Mark Johnson	0.2	\$1,150	\$230	review draft ltr from AX re D's privilege log and email to her re asme	Discovery (Non-Deposition)
4/23/2021	Mark Johnson	0.3	\$1,150	\$345	callls w/ GBW re allocation of MTCs, avilablity of staff for same	Other Motions
4/23/2021	Mark Johnson	0.7	\$1,150	\$805	review and revise draft P section of joint ltr brief on mtc task time studies and benchmarks	Other Motions
4/23/2021	Rachel Steyer	0.6	\$750	\$450	meeting with RBGG and TCC, MTJ, GBW to discuss latest updates with discovery, class member outreach, depositions	Case Organization, Planning and Strategy
4/23/2021	Rachel Steyer	2.2	\$750	\$1,650	reviewing documents for Garner depo, organizing and wokring on spreadsheet	Discovery (Non-Deposition)
4/23/2021	Travis Close	0.6	\$850	\$510	Team meeting re: class certification strategy including upcoming motions to compel	Case Organization, Planning and Strategy
4/23/2021	Travis Close	0.8	\$850	\$680	Analyze history of proposed custodians to determine whether Kevin Bowman was included in Def's proposals from the beginning	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/23/2021	Travis Close	0.4	\$850	\$340	Review and analyze revised memo by AX (co-counsel) including privilege log analysis for 1000+ additional entries	Case Organization, Planning and Strategy
4/23/2021	Travis Close	0.3	\$850	\$255	Analyze operations onboarding guide to determine relevant courses to seek from Defendants	Case Organization, Planning and Strategy
4/23/2021	Travis Close	1.6	\$850	\$1,360	Begin drafting omnibus letter re: various discovery issues to be addressed before class cert (outline)	Class Certification
4/23/2021	Travis Close	0.8	\$850	\$680	Weekly doc review meeting discussing depo prep, litigation strategy, and motions to compel	Discovery (Non-Deposition)
4/23/2021	Travis Close	1.2	\$850	\$1,020	Continue drafting omnibus MTC letter (labor variances section)	Discovery (Non-Deposition)
4/23/2021	Travis Close	1.4	\$850	\$1,190	Continue drafting omnibus MTC letter (training records and training materials section)	Discovery (Non-Deposition)
4/23/2021	Travis Close	0.2	\$850	\$170	Email to team re: Def's proposed custodians	Discovery (Non-Deposition)
4/24/2021	Guy Wallace	3.6	\$1,350	\$4,860	review and analysis of documents re service alignment and training and implementation re same	Class Certification
4/25/2021	Guy Wallace	4.9	\$1,350	\$6,615	review and analysis of documents re Service Alignment; various reports generated re same; monitoring and implementation of same; com's with MTJ re same (.5)	Class Certification
4/25/2021	Mark Johnson	6.5	\$1,150	\$7,475	prep for Toomer depo including review of docs, coms w/ GBW and SW doc reviewers, work on outline	Depositions
4/25/2021	Rachel Steyer	0.2	\$750	\$150	email to MTJ and court reporter providing exhibits used in Rhonda Dolcater depo	Depositions
4/26/2021	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ re preparation for Toomer deposition	Depositions
4/26/2021	Guy Wallace	5.2	\$1,350	\$7,020	review and analysis of potential exhibits for Garner deposition	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/26/2021	Mark Johnson	10.5	\$1,150	\$12,075	prepare for toomer depo, including calls and emails w/ GBW and RLS re documents and lines of exampination, review and organization of documents, revision of outline	Depositions
4/26/2021	Rachel Steyer	0.3	\$750	\$225	updating exhibit tracking spreadsheet to reflect additional exhibits used during Dolcater depo	Discovery (Non-Deposition)
4/26/2021	Rachel Steyer	3.4	\$750	\$2,550	conducted document review and searches for specific equipvalent of RVP playbook	Discovery (Non-Deposition)
4/26/2021	Rachel Steyer	2.8	\$750	\$2,100	reviewing ongoing documents gathered and organizing spreadsheet for garner depo	Discovery (Non-Deposition)
4/26/2021	Travis Close	0.2	\$850	\$170	Email to MTJ re: question about service alignment trainings	Case Organization, Planning and Strategy
4/26/2021	Travis Close	0.2	\$850	\$170	Email to MTJ re: courses listed in the Operations Onboarding checklist	Case Organization, Planning and Strategy
4/26/2021	Travis Close	1.3	\$850	\$1,105	Legal research into regs requiring brookdale to maintain employee training records	Class Certification
4/26/2021	Travis Close	0.9	\$850	\$765	Review and analyze past correspodance re: failure to produce all employee training materials	Class Certification
4/26/2021	Travis Close	0.2	\$850	\$170	Email to team re: regulations requiring maintenance of training records	Class Certification
4/26/2021	Travis Close	0.6	\$850	\$510	Research regulations requiring that personnel records be kept and for whom	Class Certification
4/26/2021	Travis Close	0.6	\$850	\$510	Continue drafting omnibus discovery action letter (training records section)	Class Certification
4/26/2021	Travis Close	1.4	\$850	\$1,190	Continue drafting omnibus discovery action letter (CMIPS and bonus related documents)	Class Certification
4/26/2021	Travis Close	0.7	\$850	\$595	Review all prior correspondance re: production of employee bonuses and incentives	Class Certification
4/26/2021	Travis Close	0.7	\$850	\$595	Continue drafting omnibus discovery action letter (ED performance reviews and forms of corrective action)	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/26/2021	Travis Close	0.8	\$850	\$680	Continue drafting omnibus discovery action letter (missing Kronos data)	Class Certification
4/26/2021	Travis Close	0.8	\$850	\$680	Analyze all versions of onboarding guides for complete lists of SA courses	Discovery (Non-Deposition)
4/27/2021	Guy Wallace	0.8	\$1,350	\$1,080	preparation of outline of SOF for MCC	Class Certification
4/27/2021	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re Toomer deposition	Depositions
4/27/2021	Guy Wallace	4.4	\$1,350	\$5,940	review and analysis of potential exhibits for Garner deposition	Depositions
4/27/2021	Mark Johnson	0.3	\$1,150	\$345	update call with client	Case Organization, Planning and Strategy
4/27/2021	Mark Johnson	10.7	\$1,150	\$12,305	prep for Toomer depo, including calls w GBW and BU re CCRC configurations and significance, additions and revisions to outline review exhibits and potential exhibits	Depositions
4/27/2021	Travis Close	0.9	\$850	\$765	Legal research re: regulations requiring a current plan of operation for assisted living	Case Organization, Planning and Strategy
4/27/2021	Travis Close	0.2	\$850	\$170	email to MTJ re: identifying CCRC Brookdale facilities	Case Organization, Planning and Strategy
4/27/2021	Travis Close	1.4	\$850	\$1,190	Review/analyze documents showing evidence of Brookdale's CCRC california communities	Class Certification
4/27/2021	Travis Close	1.2	\$850	\$1,020	CCRC research --- analyze differences between CCRC and regular residency agreements	Class Certification
4/27/2021	Travis Close	0.5	\$850	\$425	Analyze former correspondance re: emergency evacuation & disaster plans	Class Certification
4/27/2021	Travis Close	0.8	\$850	\$680	Continue drafting omnibus discovery action letter (Plan of Operation section)	Class Certification
4/27/2021	Travis Close	1.1	\$850	\$935	Continue drafting omnibus discovery action letter (Emergency evacuation & disaster section)	Class Certification
4/27/2021	Travis Close	0.9	\$850	\$765	Finish editing/revising first draft of omnibus action letter & send to team	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/27/2021	Travis Close	1.4	\$850	\$1,190	Research statutes and regulations requiring that each facility have emergency and disaster plans in place and up-to-date	Discovery (Non-Deposition)
4/28/2021	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ; RLS re results of Toomer depo	Depositions
4/28/2021	Guy Wallace	1.6	\$1,350	\$2,160	analysis of potential exhibits for Garner deposition	Depositions
4/28/2021	Guy Wallace	1.8	\$1,350	\$2,430	review and analysis of D's policies, procedures and training documents re transportation of residents, disability access re same	Discovery (Non-Deposition)
4/28/2021	Guy Wallace	0.9	\$1,350	\$1,215	revise and edit draft letter from TCC re D's failure to produce various categories of documents	Discovery (Non-Deposition)
4/28/2021	Guy Wallace	0.7	\$1,350	\$945	com's with potential access expert re transportation issues	Experts (Including Retention)
4/28/2021	Mark Johnson	7.1	\$1,150	\$8,165	Depo of Jeffrey Toomer	Depositions
4/28/2021	Mark Johnson	0.5	\$1,150	\$575	post-depo calls w/ GBW re Toomer testimony and implications for class certification	Depositions
4/28/2021	Mark Johnson	1.5	\$1,150	\$1,725	final prep, exhibit organization and coms w/ staff re same and setup for Toomer depo	Depositions
4/28/2021	Rachel Steyer	7.2	\$750	\$5,400	attending depo and assisting MTJ with exhibits	Depositions
4/28/2021	Rachel Steyer	0.3	\$750	\$225	email to GBW summarizing notes and thoughts from depo	Discovery (Non-Deposition)
4/28/2021	Travis Close	0.4	\$850	\$340	Review and analyze memo by AX (co-counsel) re: substitution of plaintiff	Case Organization, Planning and Strategy
4/28/2021	Travis Close	0.8	\$850	\$680	Review/analyze results for IT employees who may have worked on logic re: Service Alignment (Tina Jenkins, Justin Matanane)	Case Organization, Planning and Strategy
4/28/2021	Travis Close	0.9	\$850	\$765	Analyze "universal worker" results in relation to CA brookdale communities	Class Certification
4/28/2021	Travis Close	1.1	\$850	\$935	Search for & analyze docs describing Kronos log-in process for employees; specifically job codes (Jeff Toomer deposition testimony)	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/28/2021	Travis Close	1.3	\$850	\$1,105	Analyze Service Alignment reports reviewed by a DDO: SA management dashboard, benchmark detail by service, labor detail report, observations & root cause analysis (Jeff Toomer depo testimony)	Depositions
4/28/2021	Travis Close	0.8	\$850	\$680	Depo prep --- review and analyze results for 2020 bonus/incentive plans	Discovery (Non-Deposition)
4/28/2021	Travis Close	0.3	\$850	\$255	Review and analyze email by GG (co-counsel) re: strategy for substitution of plaintiff	Pleadings and Motions Re: Pleadings
4/28/2021	Travis Close	1.5	\$850	\$1,275	Legal research re: whether amendment complaint is required when substituting a plaintiff	Pleadings and Motions Re: Pleadings
4/29/2021	Guy Wallace	1.8	\$1,350	\$2,430	review and analysis of D's transportation policies and procedures	Class Certification
4/29/2021	Guy Wallace	0.9	\$1,350	\$1,215	preparation of topics, questions and potential exhibits for Garner deposition	Depositions
4/29/2021	Guy Wallace	0.4	\$1,350	\$540	revise and edit draft letter from TCC re categories of documents that Defendants have failed to produce	Discovery (Non-Deposition)
4/29/2021	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ re meet and confer efforts with D's re Rule 30(b)(6) depositions, task time documents and other non-produced categories of documents	Discovery (Non-Deposition)
4/29/2021	Guy Wallace	0.9	\$1,350	\$1,215	revise and edit letter draft letter from TCC to D's re categories of documents and data that have not been produced	Discovery (Non-Deposition)
4/29/2021	Guy Wallace	1.3	\$1,350	\$1,755	review and analysis of other labor and service alignment reports for which Defendants have not made a complete production; com's with MTJ re potential approach re same	Discovery (Non-Deposition)
4/29/2021	Guy Wallace	0.6	\$1,350	\$810	tc with GG; AX; KAS; MTJ; RLS re substitution of parties re the estates of three named Plaintiffs	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/29/2021	Mark Johnson	0.6	\$1,150	\$690	call w/ GBW re various Brookdale reports and strategy for getting / using same, approaches to staffing analysis	Class Certification
4/29/2021	Mark Johnson	1.5	\$1,150	\$1,725	review and revise draft ltr to OC re outstanding discovery issues	Discovery (Non-Deposition)
4/29/2021	Mark Johnson	1.1	\$1,150	\$1,265	draft responses to OC re demand for ID and dates for 30b6 depositions and discovery motion to task times; research history of coms for same; incorporate edits from GBW	Discovery (Non-Deposition)
4/29/2021	Mark Johnson	0.6	\$1,150	\$690	review GCG email re plan for mtn for substitution of plaintiffs for deceased plaintiffs, draft letter to clients and AX research memo re same	Pleadings and Motions Re: Pleadings
4/29/2021	Mark Johnson	0.5	\$1,150	\$575	call w/ GCG, AX, GBW, Stebne, TCC, RLS re strategy for mtn to substitute plaintiffs for deceased plaintiffs	Pleadings and Motions Re: Pleadings
4/29/2021	Rachel Steyer	0.6	\$750	\$450	phone call w/co-counsel, GBW, TCC, MTJ to discuss potential motion practice, amended complaint	Case Organization, Planning and Strategy
4/29/2021	Rachel Steyer	0.2	\$750	\$150	reviewing documents and correspondence provided by class member and likely declarant, creating client folder	Class Outreach and Contact
4/29/2021	Rachel Steyer	0.8	\$750	\$600	updating exhibit tracking spreadsheet	Discovery (Non-Deposition)
4/29/2021	Rachel Steyer	3.1	\$750	\$2,325	reviewing documents and updating depo prep Garner spreadsheet	Discovery (Non-Deposition)
4/29/2021	Travis Close	1.2	\$850	\$1,020	Legal research re: cases where courts certificated classes with members subject to arbitration	Class Certification
4/29/2021	Travis Close	0.8	\$850	\$680	Search for and analyze history of corrective actions issued towards HWDs at facilities	Class Certification
4/29/2021	Travis Close	0.6	\$850	\$510	Review GBW revisions to draft omnibus discovery action letter and make requested revisions	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/29/2021	Travis Close	0.7	\$850	\$595	Further revisions to draft omnibus discovery action letter	Discovery (Non-Deposition)
4/29/2021	Travis Close	1.2	\$850	\$1,020	Analyze history of discovery requests to determine requests for materials re: HWDs at facilities	Discovery (Non-Deposition)
4/29/2021	Travis Close	1.4	\$850	\$1,190	Residency Agreement contract review QC -- # FOUNTAINGROVE1618-BKD0149052 (1-43 of 1420)	Discovery (Non-Deposition)
4/29/2021	Travis Close	1.5	\$850	\$1,275	Residency Agreement contract review QC -- # BKD0149052-BKD0167693 (43-80 of 1420)	Discovery (Non-Deposition)
4/29/2021	Travis Close	0.3	\$850	\$255	Review and analyze hot docs found by JMP re: CMIP bonuses, incentives, and service alignment training	Discovery (Non-Deposition)
4/30/2021	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of D's motion to deny class certification; com's with MTJ; JY re same	Class Certification
4/30/2021	Guy Wallace	0.7	\$1,350	\$945	com's with GG; JY; AX; MTJ; TCC; RLS re tasks for class discovery and preparation for class certification; discovery issues to be resolved through meet and confer and/or motions to compel	Class Certification
4/30/2021	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ; TCC; RAB re preparation of declaration re results of JND analysis of Residency Agreements	Class Certification
4/30/2021	Guy Wallace	0.4	\$1,350	\$540	revise and edit draft class certification declarations from RLS	Class Certification
4/30/2021	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re Rule 30(b)(6) depos and preparation and assignments re same	Depositions
4/30/2021	Guy Wallace	0.4	\$1,350	\$540	com's with AX; KS; MTJ; RAB; JMP; CC re document analysis and preparation for Rule 30(b)(6) depositions	Depositions
4/30/2021	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ; TCC re discovery letter to Defendants re non-produced documents	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/30/2021	Rachel Steyer	0.6	\$750	\$450	meeting with Eidler team and RBGG co-counsel to discuss status of outstanding discovery issues, class member declarations	Case Organization, Planning and Strategy
4/30/2021	Rachel Steyer	1.1	\$750	\$825	reviewing defendant's motion to deny class certification filed	Class Certification
4/30/2021	Rachel Steyer	0.7	\$750	\$525	reviewing exhibits attached to defendant's motion to deny class certification	Class Certification
4/30/2021	Rachel Steyer	2.4	\$750	\$1,800	legal research into class member declarants who opted into arbitration	Class Certification
4/30/2021	Rachel Steyer	1.1	\$750	\$825	ongoing review of documents and adding to depo prep spreadsheet	Discovery (Non-Deposition)
4/30/2021	Travis Close	0.8	\$850	\$680	Research company background of JND for expert declaration	Case Organization, Planning and Strategy
4/30/2021	Travis Close	0.4	\$850	\$340	Review and analyze MTJ edits to omnibus letter and make requested changes	Class Certification
4/30/2021	Travis Close	0.6	\$850	\$510	Meeting with MTJ, RLS, GBW and co-counsel re: substitution of plaintiffs, discovery dispute, and upcoming depositions	Class Certification
4/30/2021	Travis Close	0.6	\$850	\$510	Weekly doc review meeting discussing items for motions to compel, M/C, and depositions	Depositions
4/30/2021	Travis Close	0.4	\$850	\$340	Meet with SLG re: strategy for upcoming discovery dispute letters	Discovery (Non-Deposition)
4/30/2021	Travis Close	0.2	\$850	\$170	Email to AX requesting assistance on discovery letter section	Discovery (Non-Deposition)
4/30/2021	Travis Close	0.3	\$850	\$255	Email to RAB re: coordinating on declaration from discovery expert	Discovery (Non-Deposition)
4/30/2021	Travis Close	1.1	\$850	\$935	Further revisions to omnibus discovery letter (added section on pendant response data)	Discovery (Non-Deposition)
4/30/2021	Travis Close	0.5	\$850	\$425	Analyze parties' correspondance re: pendant data for joint letter	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/30/2021	Travis Close	0.2	\$850	\$170	Email to RLS, MTJ, GBW re: finalizing changes in discovery action letter	Discovery (Non-Deposition)
4/30/2021	Travis Close	0.2	\$850	\$170	Email to GBW re: draft declaration for residency agreement analysis	Experts (Including Retention)
4/30/2021	Travis Close	1.6	\$850	\$1,360	Begin drafting declaration of JND project manager for residency agreement analysis (introduction and outline)	Experts (Including Retention)
5/1/2021	Guy Wallace	1.3	\$1,350	\$1,755	legal research and analysis re proposed of class definition narrower than that alleged in the complaint; whether amendment of complaint is necessary	Class Certification
5/1/2021	Guy Wallace	0.6	\$1,350	\$810	analysis of implications of D's motion to deny class certification; com's with MTJ re same	Class Certification
5/1/2021	Mark Johnson	3.0	\$1,150	\$3,450	review documents referencing and describing Brookdale reports and begin drafting memo re same	Discovery (Non-Deposition)
5/2/2021	Guy Wallace	1.3	\$1,350	\$1,755	legal research and analysis re whether Plaintiffs are required to amend the Complaint in order to propose a narrower class definition in their motion for class certification	Class Certification
5/2/2021	Guy Wallace	1.4	\$1,350	\$1,890	preparation of topics, questions and exhibits for Garner depo	Depositions
5/2/2021	Mark Johnson	4.0	\$1,150	\$4,600	continue working on memo re Brookdale reports and reviewing documents re same	Discovery (Non-Deposition)
5/3/2021	Guy Wallace	1.9	\$1,350	\$2,565	review and analysis of 20 additional email exhibits re Garner deposition	Depositions
5/3/2021	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ re draft letter re multiple discovery issues re non-produced documents	Discovery (Non-Deposition)
5/3/2021	Guy Wallace	0.6	\$1,350	\$810	review and analysis of J. Gilliam Order denying D's Motion to Deny Class Certification and implications thereof; com's with GG; MTJ	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/3/2021	Guy Wallace	1.6	\$1,350	\$2,160	legal research and analysis re whether there is any requirement to amend the complaint in order to allege a narrower class; preparation of string cite re same	Other Motions
5/3/2021	Mark Johnson	0.9	\$1,150	\$1,035	calls w/ GBW (x4) w/ GBW re discovery letters, Brookdale reports	Case Organization, Planning and Strategy
5/3/2021	Mark Johnson	0.2	\$1,150	\$230	call w/GBW re strategy for addressing GLM email re time studies.	Discovery (Non-Deposition)
5/3/2021	Mark Johnson	0.3	\$1,150	\$345	review Judge Gilliam's order on mtn to dismiss class allegations; coms w/ COC re same, including pre-emptive effect on potential subsequent motions	Other Motions
5/3/2021	Rachel Steyer	5.0	\$750	\$3,750	ongoing research into question of opt in arbitration putative class member declarants/declarations	Misc. Research
5/3/2021	Travis Close	0.7	\$850	\$595	Review and analyze data in recently produced pendant response times spreadsheets (BKD2882039-BKD2882123)	Class Certification
5/3/2021	Travis Close	1.1	\$850	\$935	Analyze ED/HWD bonus data produced from 2019 to determine datapoints and dates of applicability	Class Certification
5/3/2021	Travis Close	1.5	\$850	\$1,275	Revisions to draft omnibus letter -- add section on personnel reports and missing email	Class Certification
5/3/2021	Travis Close	0.8	\$850	\$680	Analyze history of correspondance re: producing personnel reports	Communications With Opposing Counsel
5/3/2021	Travis Close	1.6	\$850	\$1,360	Review and analyze sufficiency of Ds' production of performance reviews (clarify issue in omnibus letter)	Discovery (Non-Deposition)
5/3/2021	Travis Close	0.7	\$850	\$595	Analyze past correspondance re performance reviews (issue in omnibus letter)	Discovery (Non-Deposition)
5/3/2021	Travis Close	0.6	\$850	\$510	Review and analyze Defendant's brief iso motion to deny class certification	Pleadings and Motions Re: Pleadings
5/3/2021	Travis Close	0.1	\$850	\$85	Review judge Gilliam's order denying Def's motion to deny class certification	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/3/2021	Travis Close	0.5	\$850	\$425	Review and analyze exhibits, declarations, & supplements iso Defendant's motion to deny class certification	Pleadings and Motions Re: Pleadings
5/4/2021	Guy Wallace	0.6	\$1,350	\$810	com's with RLS re preparation of declarations of putative class members and approach re collection of same for class certification	Class Certification
5/4/2021	Guy Wallace	3.8	\$1,350	\$5,130	revise and edit draft declarations of putative class members re MCC	Class Certification
5/4/2021	Guy Wallace	1.1	\$1,350	\$1,485	team ZOOM mtg. re putative class member declarations; motions to compel and meet and confer efforts re same; substitution of successors-in-interest; expert retention; investigation of potential former Brookdale ED declarations	Class Certification
5/4/2021	Guy Wallace	0.4	\$1,350	\$540	review and revise draft letter from MTJ to D's re discovery issues	Discovery (Non-Deposition)
5/4/2021	Guy Wallace	0.8	\$1,350	\$1,080	legal research and analysis re Ninth Circuit's decision in Blair and potential application to arbitration issues	Misc. Research
5/4/2021	Guy Wallace	0.4	\$1,350	\$540	com's with GG; AX re motion to substitute successors in interest and application of Rule 25; revise and edit letter to Maatman re same	Other Motions
5/4/2021	Mark Johnson	1.2	\$1,150	\$1,380	team zoom mtg re motions to compel, open discovery issues, ruling from Judge Beeler and meet and confer process; class member declarations and allocztion of work, progress on retaining experts.	Case Organization, Planning and Strategy
5/4/2021	Mark Johnson	0.9	\$1,150	\$1,035	calls w/ GBW (x7) re discovery demand ltr, ruling from MJ Beeler on task time and benchmark moition, strategy for other discovery issues, mtg w/ Marks and Thornton, scope of class and potential injunctive relief class unlimited by arbitration clause	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/4/2021	Mark Johnson	0.8	\$1,150	\$920	review case law (Blairv Rent-a-Center)re scope of class and ability to certify class for injunctive relief despite arb claus.	Class Certification
5/4/2021	Mark Johnson	1.4	\$1,150	\$1,610	begin outlining depo exam for 30b6 topic related to assessments	Depositions
5/4/2021	Mark Johnson	0.3	\$1,150	\$345	draft follow-up demand for designation of 30b6 witnesses, review and draft responses to OC email claiming need for service of new notice identifying dates for topics.	Depositions
5/4/2021	Mark Johnson	0.1	\$1,150	\$115	email to OC requesting meet and confer time for task times studies and benchmarks (RFP 1-4, set 4).	Discovery (Non-Deposition)
5/4/2021	Mark Johnson	2.3	\$1,150	\$2,645	further re-write of demand letter to meet and confer re multiple outstanding discovery issues; revise same based on additional input from GBW, RLS	Other Motions
5/4/2021	Mark Johnson	0.6	\$1,150	\$690	revise and finalize discovery ltr re task times and benchmarks; com w/ staff re finalizing and filing	Other Motions
5/4/2021	Mark Johnson	0.2	\$1,150	\$230	review and finalize email seeking meet and confer on sufficiency of responses to Carlson rogs 3 and 4.	Other Motions
5/4/2021	Rachel Steyer	1.2	\$750	\$900	zoom meeting with TCC, MTJ, GBW, and co-counsel at RBGG to discuss class member declarations, oustanding discovery issues (MTCs), former employee investigation project	Case Organization, Planning and Strategy
5/4/2021	Rachel Steyer	0.3	\$750	\$225	editing KAJ draft class member declaration	Class Certification
5/4/2021	Rachel Steyer	0.2	\$750	\$150	working on class member declaration	Class Certification
5/4/2021	Rachel Steyer	0.3	\$750	\$225	response to KDL, KAJ, TRA regarding workflow for class outreach and drafting declarations	Class Outreach and Contact
5/4/2021	Rachel Steyer	0.4	\$750	\$300	phone call w/GBW to discuss status of draft declarations	Class Outreach and Contact
5/4/2021	Rachel Steyer	0.6	\$750	\$450	reviewing sharepoint data and outreach efforts	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/4/2021	Rachel Steyer	0.8	\$750	\$600	email to TRB, TRA, KDL, KAJ summarizing processes re finalizing class member declarations, prioritizing class outreach efforts, and general points following declaration meeting	Class Outreach and Contact
5/4/2021	Rachel Steyer	0.3	\$750	\$225	additional review of sharepoint data for class outreach and declaration drafting	Class Outreach and Contact
5/4/2021	Rachel Steyer	0.2	\$750	\$150	email to RAB with question about opt-out class member spreadsheet/obtaining contact info from ESI	Class Outreach and Contact
5/4/2021	Rachel Steyer	0.3	\$750	\$225	reviewing files and documents for likely class member declarants	Class Outreach and Contact
5/4/2021	Rachel Steyer	2.2	\$750	\$1,650	ongoing legal research into question of arbitration class members ability to serve as declarants/factual witnesses	Misc. Research
5/4/2021	Travis Close	1.1	\$850	\$935	Meet and confer with MTJ, GBW, and co-counsel re: strategy for plaintiff substitution, motions to compel, and arbitration issues	Class Certification
5/5/2021	Guy Wallace	1.1	\$1,350	\$1,485	revise and edit drafts of declarations of putative class members; com's with RLS re same	Class Certification
5/5/2021	Guy Wallace	0.4	\$1,350	\$540	com's with GG re Ninth Circuit's decision in Blair re public injunctions and impact on proposed class definitions	Class Certification
5/5/2021	Guy Wallace	0.9	\$1,350	\$1,215	com's with MTJ re Ninth Circuit's decision in Blair re public injunctions and impact on proposed class definitions; ability of Quinlan's estate to challenge Brookdale's arbitration agreement	Class Certification
5/5/2021	Guy Wallace	1.4	\$1,350	\$1,890	review and analysis of Ninth Circuit's decision in Blair; language of Brookdale's arbitration agreement	Class Certification
5/5/2021	Guy Wallace	0.3	\$1,350	\$405	com's with Waters re preparation of declaration re class certification	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/5/2021	Guy Wallace	0.8	\$1,350	\$1,080	com's with Marks, Thornton, MTJ re potential use of Brookdale's various reports and data to analyze Brookdale's acuity assessments and staffing	Experts (Including Retention)
5/5/2021	Mark Johnson	0.4	\$1,150	\$460	call w GBW re impact of Blair decision on scope of class for public injunction and strategy for framing class, issuses related to standing.	Class Certification
5/5/2021	Mark Johnson	1.0	\$1,150	\$1,150	call w/ GBW to discuss impact of Ninth Cicuit's decision in Blair on class definition and claims for public injunction strategy for gettig Quinlan claims back before the Court	Class Certification
5/5/2021	Rachel Steyer	0.3	\$750	\$225	reviewing and incorporating GBW edits to class member declaration	Class Certification
5/5/2021	Rachel Steyer	0.6	\$750	\$450	editing and reviewing KAJ draft declaration	Class Certification
5/5/2021	Rachel Steyer	0.4	\$750	\$300	email to KDL, KAJ, TRA relaying initial feedback from GBW concerning declaration drafting	Class Certification
5/5/2021	Rachel Steyer	0.5	\$750	\$375	reviewing and editing KAJ draft declaration	Class Certification
5/5/2021	Rachel Steyer	0.4	\$750	\$300	email to TRB, TRA, KDL, KAJ regarding class outreach efforts	Class Outreach and Contact
5/5/2021	Rachel Steyer	0.2	\$750	\$150	phone call w/class member explaining case, requested more info	Class Outreach and Contact
5/5/2021	Rachel Steyer	0.2	\$750	\$150	phone call w/class member, scheduled intake call for next week	Class Outreach and Contact
5/5/2021	Rachel Steyer	0.9	\$750	\$675	reviewing residency agreements to identify contact names and information to update sharepoint (specifically names assigned where team member indicated that there was no phone number listed)	Class Outreach and Contact
5/5/2021	Rachel Steyer	0.7	\$750	\$525	ongoing review of sharepoint and outreach data, reviewing latest opt out arbitration class list, comparing names to class list data	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/5/2021	Travis Close	0.2	\$850	\$170	Email to GBW re: arbitration section from residency agreement	Case Organization, Planning and Strategy
5/5/2021	Travis Close	0.4	\$850	\$340	Review and analyze memo by MTJ re: summary of reports of brookdale's labor systems	Case Organization, Planning and Strategy
5/5/2021	Travis Close	1.1	\$850	\$935	Analyze of arbitration section across residency agreements for GBW	Class Certification
5/5/2021	Travis Close	0.5	\$850	\$425	Analyze final revisions and edits to draft omnibus letter	Class Certification
5/5/2021	Travis Close	0.3	\$850	\$255	Review and analyze list of outstanding document discovery issues with defendants	Class Certification
5/5/2021	Travis Close	1.3	\$850	\$1,105	Review residency agreement doc review protocol and coding panel memo + related correspondence for drafting declaration for RA analysis	Class Certification
5/5/2021	Travis Close	1.4	\$850	\$1,190	Continue drafting declaration of JND regarding residency agreement analysis undertaken (results of analysis)	Class Certification
5/5/2021	Travis Close	1.2	\$850	\$1,020	Continue drafting declaration of JND regarding residency agreement analysis undertaken (QA and training)	Class Certification
5/5/2021	Travis Close	1.1	\$850	\$935	Continue drafting declaration of JND regarding residency agreement analysis undertaken (coding panel and coding protocol instructions)	Class Certification
5/6/2021	Guy Wallace	1.2	\$1,350	\$1,620	revise and edit draft class member declarations; com's with MTJ; RLS re same	Class Certification
5/6/2021	Guy Wallace	3.3	\$1,350	\$4,455	legal and factual research and analysis re potential application of Blair and McGill cases re Brookdale's arbitration agreements; com's with GG; MTJ re same (1.1)	Class Certification
5/6/2021	Guy Wallace	0.3	\$1,350	\$405	com's with Waters re expert declarations	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/6/2021	Guy Wallace	0.9	\$1,350	\$1,215	com's with Marks; Thornton; MTJ re potential use of information from Brookdale reports for purposes of staffing analysis	Experts (Including Retention)
5/6/2021	Mark Johnson	0.5	\$1,150	\$575	follow-up call w/ GBW re strategy for class cert definition that includes arb class members based on McGill, Blair and facts supporting same, including history of appeal for Plaintiff Quinlan	Class Certification
5/6/2021	Mark Johnson	0.5	\$1,150	\$575	call w/ GBW re proposed declaratrion under EC 1006 re residency agreement reveiw	Class Certification
5/6/2021	Mark Johnson	1.7	\$1,150	\$1,955	review class melmber declarations w/ redlien from GBW, make notes re guidlines for same	Class Certification
5/6/2021	Mark Johnson	0.5	\$1,150	\$575	review examples of maximum staffing reports from doc reviewers and coms re same	Class Certification
5/6/2021	Mark Johnson	1.1	\$1,150	\$1,265	work on depo outline for assessment portion of 30(b)(6) depo; review and iddentify potential exhibits for same	Depositions
5/6/2021	Mark Johnson	0.8	\$1,150	\$920	review prior email from COC Thornton re missing data; draft proposed emai seeking data from OC and share w. /COC	Discovery (Non-Deposition)
5/6/2021	Rachel Steyer	0.4	\$750	\$300	phone call with GBW to discuss declarations	Class Certification
5/6/2021	Rachel Steyer	0.7	\$750	\$525	weekly outreach team meeting	Class Outreach and Contact
5/6/2021	Rachel Steyer	1.0	\$750	\$750	reviewing emails from EPO, JMP, RAB, BFK sharing relevant documents and reports, reviewing documents	Discovery (Non-Deposition)
5/6/2021	Travis Close	1.1	\$850	\$935	Analyze prior correspondance re: prepping for contract review project (Kein Marquis dec iso class cert)	Case Organization, Planning and Strategy
5/6/2021	Travis Close	0.4	\$850	\$340	Analyze spreadsheet by RAB re: arbitration opt outs and de-duping	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/6/2021	Travis Close	1.3	\$850	\$1,105	Continue drafting declaration from kevin marquis iso class cert re residency agreement contract review (results of analysis)	Class Certification
5/6/2021	Travis Close	0.3	\$850	\$255	Email to RAB re: draft dec of kevin marquis for review	Class Certification
5/6/2021	Travis Close	0.2	\$850	\$170	Email to GBW re: representational language search needed across residency agreements	Discovery (Non-Deposition)
5/6/2021	Travis Close	0.2	\$850	\$170	Call with GBW re: assignment regarding language-based search in residency agreements	Discovery (Non-Deposition)
5/6/2021	Travis Close	0.4	\$850	\$340	Search for & isolate example residency agreements for each year	Discovery (Non-Deposition)
5/6/2021	Travis Close	0.6	\$850	\$510	Analyze/compare language in section I.B. regarding payment for services for sample residency agreements located for each year	Discovery (Non-Deposition)
5/7/2021	Guy Wallace	1.4	\$1,350	\$1,890	preparation of common issues and defects re D's policies and practices that violate the ADA	Class Certification
5/7/2021	Guy Wallace	0.8	\$1,350	\$1,080	com's with team re preparation for class certification motion, including issues re D's arbitration agreement; preparation for Rule 30(b)(6) depositions; current meet and confer efforts and MTCs	Class Certification
5/7/2021	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re preparation for and scheduling of Rule 30(b)(6) depositions	Discovery (Non-Deposition)
5/7/2021	Guy Wallace	0.5	\$1,350	\$675	com's with document review and analysis team re preparation for Rule 30(b)(6) depositions	Discovery (Non-Deposition)
5/7/2021	Guy Wallace	0.7	\$1,350	\$945	com's with Kailes re analysis of D's evacuation policies and plans	Experts (Including Retention)
5/7/2021	Mark Johnson	0.6	\$1,150	\$690	draft memo re guidelines for class member declarations iso mtn for class certification	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/7/2021	Mark Johnson	0.7	\$1,150	\$805	litigation team mtg re meet and confer and motion to comple issues, progress on tasks for class certification motion, socpe of class and implications of Blair decision	Class Certification
5/7/2021	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re analysis of using Blair and public injunction analysi as a basis for including residents subject to arbitration in the class	Class Certification
5/7/2021	Mark Johnson	0.5	\$1,150	\$575	regular mtg w/ doc reviewers re doc review for 30(b)(6) depos and class cert	Depositions
5/7/2021	Mark Johnson	0.5	\$1,150	\$575	review sample Brookdale service alignment reports and send to co-counsel for identification of data for staffing analysis	Discovery (Non-Deposition)
5/7/2021	Mark Johnson	0.7	\$1,150	\$805	draft email to OC GLM listing 10 outstanding items on which to meet and confer and history re same	Discovery (Non-Deposition)
5/7/2021	Travis Close	0.3	\$850	\$255	Email to EPO re: updating spreadsheet with revised interrogatory responses regarding new construction and alterations	Case Organization, Planning and Strategy
5/7/2021	Travis Close	0.3	\$850	\$255	Review and analyze memo by KS (co-counsel) re: summary of ADA transportation and emergency evac issues for Bowman depo	Depositions
5/7/2021	Travis Close	1.5	\$850	\$1,275	Weekly doc review meeting w/ SWCK team & RBGG (discussion motions to compel, 30(b)(6) topics, and class cert strategy)	Discovery (Non-Deposition)
5/7/2021	Travis Close	0.7	\$850	\$595	Review Brookdale's revised responses to ROGs tracking new construction facilities and facilities where alterations had taken place that would trigger compliance under ADA	Discovery (Non-Deposition)
5/7/2021	Travis Close	0.3	\$850	\$255	Review and analyze legal research from co counsel re: no M/C required before filing motion	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/7/2021	Travis Close	1.2	\$850	\$1,020	Analyze discovery requests served for requests that cover ADA capital improvement projects and budgets	Discovery (Non-Deposition)
5/7/2021	Travis Close	0.3	\$850	\$255	Email to MTJ, GBW re: requests that cover ADA capital improvements and budgets	Discovery (Non-Deposition)
5/7/2021	Travis Close	1.2	\$850	\$1,020	Search and collect instances of capital improvement budgets for ADA access work produced to-date	Discovery (Non-Deposition)
5/7/2021	Travis Close	0.2	\$850	\$170	Review and analyze dec of Kevin Bowman iso mtn to deny class cert + exhibits	Pleadings and Motions Re: Pleadings
5/7/2021	Travis Close	0.4	\$850	\$340	Review and analyze Def's motion to deny class cert and MPA iso	Pleadings and Motions Re: Pleadings
5/7/2021	Travis Close	0.4	\$850	\$340	Review and analyze dec of theresa ward iso Def's motion to deny class cert + exhibits	Pleadings and Motions Re: Pleadings
5/7/2021	Travis Close	0.2	\$850	\$170	Email to MTJ re: meeting next week regarding kevin marquis declaration	Pleadings and Motions Re: Pleadings
5/10/2021	Guy Wallace	1.8	\$1,350	\$2,430	preparation for P's motion for class certification, including declarations of class members re transportation and evacuation issues; declaration of Flores re staffing issues	Class Certification
5/10/2021	Guy Wallace	0.8	\$1,350	\$1,080	preparation of tasks re motion for class certification	Class Certification
5/10/2021	Guy Wallace	2.7	\$1,350	\$3,645	review and analysis of draft declaration of Marquis re Residency Agreement; revise and edit same; review and analysis of D's declarations from Bowman and Buser re Residency Agreements	Class Certification
5/10/2021	Guy Wallace	0.8	\$1,350	\$1,080	analysis of whether arbitration agreements prior to Brookdale ownership would be enforceable re ADA and Unruh Act claims; number of pre-July 2014 arbitration agreements	Class Certification
5/10/2021	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of D's proposed schedule re Rule 30(b)(6) depositions; com's with MTJ re same	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/10/2021	Guy Wallace	0.5	\$1,350	\$675	review and analysis of D's proposed motion for protective order	Other Motions
5/10/2021	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of D's draft motion for protective order; com's with MTJ re same	Other Motions
5/10/2021	Mark Johnson	0.6	\$1,150	\$690	call w/ Kevin Marquis, RAB, TCC re draft declartrion in support of Residency agreement REview	Class Certification
5/10/2021	Mark Johnson	0.2	\$1,150	\$230	review and analysis of prpoed depo schedulesent by OC GLM	Depositions
5/10/2021	Mark Johnson	0.2	\$1,150	\$230	draft email to OC GLM re proposed depo schedule	Depositions
5/10/2021	Mark Johnson	1.1	\$1,150	\$1,265	call w/ GBW re D proposed 30b6 depo schedule,strategy for responding to same, allocation of time to topics and availablity for dates.	Discovery (Non-Deposition)
5/10/2021	Mark Johnson	1.2	\$1,150	\$1,380	call w/ GBW re strategy for response to OC draft ltr brief re enforcement of conditions for extension for class cert filing; strategy for meet and confer on outstanding discovery issues and potential motions to compel	Discovery (Non-Deposition)
5/10/2021	Rachel Steyer	0.7	\$750	\$525	phnoe call with KAJ to discuss and review edits to class member declaration	Class Certification
5/10/2021	Rachel Steyer	0.7	\$750	\$525	reviewing and editing KAJ draft declaration	Class Certification
5/10/2021	Rachel Steyer	0.8	\$750	\$600	editing and reviewing KDL draft class member declarations	Class Certification
5/10/2021	Rachel Steyer	0.9	\$750	\$675	phone call w/class member, did not conduct intake b/c individual ultimately was not interested in serving as declarant, explained case and elicited general information	Class Outreach and Contact
5/10/2021	Rachel Steyer	0.2	\$750	\$150	email to TRB regarding additional outreach efforts/projects	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/10/2021	Travis Close	1.3	\$850	\$1,105	Analyze/compare variation in Emeritus/summer residency agreements and Brookdale residency agreements	Class Certification
5/10/2021	Travis Close	0.5	\$850	\$425	Prep for meeting with RAB, MTJ, and Kevin Marquis (JND) re Marquis dec iso class cert (review draft dec and comments; create list of questions to guide discussion)	Class Certification
5/10/2021	Travis Close	0.6	\$850	\$510	Meeting with MTJ, RAB, Kevin Marquis (JND) re marquis dec iso class cert	Class Certification
5/10/2021	Travis Close	0.5	\$850	\$425	Review and analyze template residency agreements cited in Bowman declaration (Def's motion to deny class cert) for key language variation	Class Certification
5/10/2021	Travis Close	1.4	\$850	\$1,190	Edits/revisions to master list of facts for class certification	Class Certification
5/10/2021	Travis Close	0.2	\$850	\$170	Review and analyze def's proposed joint letter brief / protective order re: additional discovery	Discovery (Non-Deposition)
5/10/2021	Travis Close	0.2	\$850	\$170	Review and analyze Def's response to Ps letter re: deficient privilege logs	Discovery (Non-Deposition)
5/10/2021	Travis Close	0.6	\$850	\$510	Analyze changes made to Residency Agreement template by andrew lindner in 2015	Discovery (Non-Deposition)
5/10/2021	Travis Close	0.4	\$850	\$340	Analyze changes made to the RCFEs' Plan of Operation by Andrew Lindner in 2015	Discovery (Non-Deposition)
5/10/2021	Travis Close	0.6	\$850	\$510	Search for evidence of exact date of Brookdale-Emeritus merger	Discovery (Non-Deposition)
5/10/2021	Travis Close	0.3	\$850	\$255	Email to EPO re: amended ROGs responses showing facilities of new constructions	Discovery (Non-Deposition)
5/10/2021	Travis Close	0.2	\$850	\$170	Email to GBW, MTJ re: dates found for brookdale-emeritus merger	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/10/2021	Travis Close	0.6	\$850	\$510	Analyze Def's allegations re: numbers of class members not subject to arbitration, and variation in residency agreements, from their motion to deny class cert	Pleadings and Motions Re: Pleadings
5/10/2021	Travis Close	0.5	\$850	\$425	Review/analyze Dec of Matthew Buser iso motion to deny class cert (Def's analysis of residency agreements) and compare to our draft dec of kevin marquis re: same	Pleadings and Motions Re: Pleadings
5/11/2021	Guy Wallace	0.6	\$1,350	\$810	com's with BBK; AX; BU; MTJ; TCC; RLS re Rule 30(b)(6) deposition schedule	Depositions
5/11/2021	Guy Wallace	1.3	\$1,350	\$1,755	tc with D's counsel re discovery issues and D's proposed motion for a protective order	Discovery (Non-Deposition)
5/11/2021	Guy Wallace	0.9	\$1,350	\$1,215	com's with MTJ; TCC; AX re results of meet and confer; preparation of motions to compel and opposition to D's proposed motion for a protective order	Discovery (Non-Deposition)
5/11/2021	Guy Wallace	0.4	\$1,350	\$540	com's with DTM; MTJ re data	Discovery (Non-Deposition)
5/11/2021	Guy Wallace	0.3	\$1,350	\$405	review and analysis of D's performance reviews of ED's; com with RLS re same	Discovery (Non-Deposition)
5/11/2021	Guy Wallace	0.2	\$1,350	\$270	com's with TCC; CC; JP re D's production of emergency evacuation plans; plans of operations	Discovery (Non-Deposition)
5/11/2021	Guy Wallace	1.4	\$1,350	\$1,890	review and analysis of D's motion for protective order; preparation of arguments re same	Other Motions
5/11/2021	Mark Johnson	0.9	\$1,150	\$1,035	call w/ GBW, TCC, AX re letter briefs to be drafted and allocation of work	Other Motions
5/11/2021	Mark Johnson	1.3	\$1,150	\$1,495	meet and confer w/ OC re multiple issues.identified in emails and letters	Other Motions
5/11/2021	Mark Johnson	3.5	\$1,150	\$4,025	work on draft ltr brief to compel job descriptions, bonus materials, corrective actions.	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/11/2021	Rachel Steyer	1.1	\$750	\$825	conducted partial intake with class member, scheduled follow up call to continue questionnaire	Class Outreach and Contact
5/11/2021	Rachel Steyer	0.4	\$750	\$300	conference with Eidler team and cocounsel to discuss revised 30b6 depo schedule	Depositions
5/11/2021	Rachel Steyer	2.4	\$750	\$1,800	conducting search adn review of performance review related documents adn materials	Discovery (Non-Deposition)
5/11/2021	Travis Close	0.5	\$850	\$425	Review and analyze new updates on divestment of Salinas facility through DSS filings and website searches	Case Organization, Planning and Strategy
5/11/2021	Travis Close	1.4	\$850	\$1,190	Analyze BU number deficiencies/irregularities cited by staffing experts for certain facilities	Class Certification
5/11/2021	Travis Close	1.1	\$850	\$935	Create spreadsheet with old BU numbers for CA brookdale facilities based on documents produced to-date	Class Certification
5/11/2021	Travis Close	0.9	\$850	\$765	Analyze through boolean searches old/new BU numbers for certain facilities cited by staffing experts where more info is needed, to verify dates associated with BUs	Class Certification
5/11/2021	Travis Close	0.4	\$850	\$340	Email to staffing experts re: explanation of irregular/multiple BU numbers for some facilities, at certain times	Class Certification
5/11/2021	Travis Close	0.5	\$850	\$425	Meeting with MTJ, CAC, RLS, JMP, GBW & co-counsel re: strategy for 30(b)(6) depo before today's call	Depositions
5/11/2021	Travis Close	0.1	\$850	\$85	Review and analyze GBW's proposed revised 30(b)(6) schedule	Depositions
5/11/2021	Travis Close	1.2	\$850	\$1,020	Meet/confer call with Defendants re: 30(b)(6) depo topics and other discovery issues	Depositions
5/11/2021	Travis Close	0.2	\$850	\$170	Email to GBW re: info on performance review examples	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/11/2021	Travis Close	1.2	\$850	\$1,020	Create timeline of history of discovery negotiations re: emergency evacuation policies and procedures	Discovery (Non-Deposition)
5/11/2021	Travis Close	0.9	\$850	\$765	Call following M/C with Defendants with AXU, GBW, MTJ re: strategy for proceeding on motions to compel and opposing motion for protective order	Other Motions
5/12/2021	Guy Wallace	0.3	\$1,350	\$405	review and analysis of further draft of Marquis Declaration; com's with MTJ; TCC; RAB re same	Class Certification
5/12/2021	Guy Wallace	3.8	\$1,350	\$5,130	revise and edit drafts of putative class member declarations; com's with RLS; MTJ re same (.4)	Class Certification
5/12/2021	Guy Wallace	0.4	\$1,350	\$540	review and analysis of D's responses to Carlson Interrogatories Nos. 3 and 4; com's with MTJ re same	Discovery (Non-Deposition)
5/12/2021	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re tc with DTM and JT re staffing analysis	Experts (Including Retention)
5/12/2021	Guy Wallace	2.1	\$1,350	\$2,835	preparation of opposition to D's motion for protective order; legal research and analysis re same	Other Motions
5/12/2021	Guy Wallace	0.3	\$1,350	\$405	com's with TCC re D's motion for protective order	Other Motions
5/12/2021	Mark Johnson	8.0	\$1,150	\$9,200	continue working on joint ltr brief re job descriptions performance reviews and bonus plans; start and complete draft of ltr brief re post April ESI	Other Motions
5/12/2021	Rachel Steyer	1.0	\$750	\$750	editing and reviewing draft KDL class member declarations	Class Certification
5/12/2021	Rachel Steyer	0.7	\$750	\$525	editing and reviewing draft KDL class member declaration	Class Certification
5/12/2021	Rachel Steyer	1.1	\$750	\$825	reviewing and editing KAJ draft declarations	Class Certification
5/12/2021	Rachel Steyer	0.3	\$750	\$225	email to TRB and RAB regarding outreach efforts and generating new class members/contact info	Class Outreach and Contact
5/12/2021	Rachel Steyer	0.6	\$750	\$450	phone call with TRB to discuss outreach efforts	Class Outreach and Contact
5/12/2021	Rachel Steyer	0.2	\$750	\$150	email to TCC, GBW, MTJ providing info regarding searches into performance review documents	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/12/2021	Rachel Steyer	1.1	\$750	\$825	research into standard for protective order to produce discovery	Discovery (Non-Deposition)
5/12/2021	Travis Close	0.3	\$850	\$255	Review/analyze draft of class member juanda davis iso class cert	Class Certification
5/12/2021	Travis Close	0.3	\$850	\$255	Review and analyze dec of class member Daniel Maxson iso class cert	Class Certification
5/12/2021	Travis Close	0.5	\$850	\$425	Review and analyze transcript of march 18 hearing with judge beeler for info on lingering discovery disputes	Discovery (Non-Deposition)
5/12/2021	Travis Close	0.2	\$850	\$170	Email to LEC, MTJ, GBW responding to Def's argument about continued pursuit of discovery	Discovery (Non-Deposition)
5/12/2021	Travis Close	0.9	\$850	\$765	Finish drafting timeline of meet and confer efforts re: emergency evacuation plans and procedures	Discovery (Non-Deposition)
5/12/2021	Travis Close	1.3	\$850	\$1,105	Begin drafting motion to compel emergency evacuation plans and procedures	Discovery (Non-Deposition)
5/12/2021	Travis Close	0.3	\$850	\$255	Review and analyze staffing experts' update of data deficiencies and concerns	Experts (Including Retention)
5/12/2021	Travis Close	0.3	\$850	\$255	Call with GBW re: strategy for opposing defendants' motion for protective order re discovery	Other Motions
5/12/2021	Travis Close	0.5	\$850	\$425	Analyze, collect and paste discovery requests and Def's responses for Job Descriptions (in responding to motion for protective order)	Other Motions
5/12/2021	Travis Close	0.8	\$850	\$680	Analyze, collect and paste discovery requests and Def's responses for Variance Reports (in responding to motion for protective order)	Other Motions
5/12/2021	Travis Close	0.4	\$850	\$340	Analyze, collect and paste discovery requests and Def's responses for Other Reports (in responding to motion for protective order)	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/12/2021	Travis Close	0.6	\$850	\$510	Analyze, collect and paste discovery requests and Def's responses for Training Materials (in responding to motion for protective order)	Other Motions
5/12/2021	Travis Close	0.4	\$850	\$340	Analyze, collect and paste discovery requests and Def's responses for Bonuses (in responding to motion for protective order)	Other Motions
5/12/2021	Travis Close	0.3	\$850	\$255	Analyze, collect and paste discovery requests and Def's responses for Performance reviews and corrective action (in responding to motion for protective order)	Other Motions
5/12/2021	Travis Close	0.8	\$850	\$680	Analyze, collect and paste discovery requests and Def's responses for Operation Plans (in responding to motion for protective order)	Other Motions
5/12/2021	Travis Close	0.2	\$850	\$170	Email to GBW re: analysis of relevant requests/responses for items in Def's motion for protective order	Other Motions
5/13/2021	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ re D's non-produced staffing data and MTC re same, including potential compromise resolutions	Discovery (Non-Deposition)
5/13/2021	Guy Wallace	0.3	\$1,350	\$405	analysis of D's failure to produce operations plans re facilities	Discovery (Non-Deposition)
5/13/2021	Guy Wallace	0.9	\$1,350	\$1,215	com's with Marks; Thorton; MTJ; TCC re staffing analysis	Experts (Including Retention)
5/13/2021	Guy Wallace	0.7	\$1,350	\$945	review and analysis of D's motion for protective order	Other Motions
5/13/2021	Guy Wallace	0.3	\$1,350	\$405	review and analysis of draft MTC re emergency evacuation plans	Other Motions
5/13/2021	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re motions to compel D's non-produced categories of documents as set forth in May 5, 2021 letter	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/13/2021	Guy Wallace	2.3	\$1,350	\$3,105	preparation and drafting of opposition to D's motion for protective order	Other Motions
5/13/2021	Mark Johnson	0.9	\$1,150	\$1,035	calls w/ GBW re data issues, motions to compel and exhaustion of efforts to meet and confer, document productions	Case Organization, Planning and Strategy
5/13/2021	Mark Johnson	1.0	\$1,150	\$1,150	GTM call w/ Marks, Thornton, GBW re data and reports, missing data	Class Certification
5/13/2021	Mark Johnson	0.6	\$1,150	\$690	draft propsoed email to OC re exhaustion of meet and confer efforts on several doc production issues and mtns to compel	Discovery (Non-Deposition)
5/13/2021	Mark Johnson	0.5	\$1,150	\$575	re-work draft email to OC re missing data and email Marks, Thornton, Peters re same	Discovery (Non-Deposition)
5/13/2021	Rachel Steyer	0.8	\$750	\$600	reviewing and editing KAJ draft declaration	Class Certification
5/13/2021	Rachel Steyer	2.0	\$750	\$1,500	research into standard for protective order in NDCA	Discovery (Non-Deposition)
5/13/2021	Travis Close	0.7	\$850	\$595	Review and analyze depo testimony of Jeffrey Toomer for info on whether Brookdale's corporate policies apply to all communities	Class Certification
5/13/2021	Travis Close	0.6	\$850	\$510	Analyze understaffing complaints from San Ramon facility by class members/family members for List of Key Facts for Class Cert	Class Certification
5/13/2021	Travis Close	0.5	\$850	\$425	Review and analyze draft dec of BBK iso class cert (referencing complaints) + exhibits	Class Certification
5/13/2021	Travis Close	1.0	\$850	\$850	Continue filling in chart of List of Key Facts for Class Certification (resident complaints re understaffing and food quality)	Class Certification
5/13/2021	Travis Close	1.5	\$850	\$1,275	Continue drafting joint letter brief (re deficint production of plans of operation)	Discovery (Non-Deposition)
5/13/2021	Travis Close	0.8	\$850	\$680	research caselaw on what counts as acceptable gap between ESI collection and production date	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/13/2021	Travis Close	1.2	\$850	\$1,020	Legal research re: obligation to respond timely to court orders from maigstrate judges re: discovery	Other Motions
5/13/2021	Travis Close	1.3	\$850	\$1,105	Continue drafting joint letter brief re emergency evacuation (history of M/C efforts)	Other Motions
5/13/2021	Travis Close	0.2	\$850	\$170	Email to MTJ, GBW, RLS sharing draft joint letter brief on emergency evacuation and plans of operation	Other Motions
5/13/2021	Travis Close	0.2	\$850	\$170	Email to GBW, MTJ re: need to follow up with Defs about emergency evacuation docs	Other Motions
5/14/2021	Guy Wallace	2.3	\$1,350	\$3,105	revise and edit draft class member declarations; analysis of models re same	Class Certification
5/14/2021	Guy Wallace	0.6	\$1,350	\$810	team ZOOM re opposition to D's motion for protective order; motions to compel; class member declarations; motion to substitute for deceased Plaintiffs	Class Certification
5/14/2021	Guy Wallace	0.5	\$1,350	\$675	team call re document analysis for purposes of Rule 30(b)(6) deposition preparation	Discovery (Non-Deposition)
5/14/2021	Guy Wallace	0.3	\$1,350	\$405	com's with Waters re expert inspections and emergency evacuation features	Experts (Including Retention)
5/14/2021	Guy Wallace	1.7	\$1,350	\$2,295	preparation and drafting of opposition to D's motion for a protective order	Other Motions
5/14/2021	Guy Wallace	1.1	\$1,350	\$1,485	preparation and drafting of opposition to D's motion for protective order re further discovery; com's with JY; MTJ; TCC; RLS re same	Other Motions
5/14/2021	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ re motions to compel employee-related documents; ESI; revise and edit drafts of same	Other Motions
5/14/2021	Mark Johnson	0.5	\$1,150	\$575	team mtg re status of document production for 30b6 depos, class cert mtn	Class Certification
5/14/2021	Mark Johnson	0.5	\$1,150	\$575	team mtg w/ co-counsel re 30b6 depos, motions to compel, substitution mtn	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/14/2021	Mark Johnson	0.3	\$1,150	\$345	review and draft response to OC ltr and email concerning 30(b)(6) deposition sessions, outlining clarifications	Depositions
5/14/2021	Mark Johnson	0.6	\$1,150	\$690	com w/ B Peters re data; revise and send email to OC re issues with assessment and move-out data	Discovery (Non-Deposition)
5/14/2021	Mark Johnson	0.4	\$1,150	\$460	revise draft email to OC re multiple issues ripe for motions to compel and confirmation of impasse, invitation to confer further.	Discovery (Non-Deposition)
5/14/2021	Mark Johnson	0.1	\$1,150	\$115	email to OC Justin Curley re verification of respoinsees to Carlson rogs	Discovery (Non-Deposition)
5/14/2021	Mark Johnson	0.1	\$1,150	\$115	email to OC Jacobsen re agreement to supplement production of rogs 1-4, set four	Discovery (Non-Deposition)
5/14/2021	Mark Johnson	0.1	\$1,150	\$115	draft email to OC renewing request for date to meet and confer on timekeeping data.	Discovery (Non-Deposition)
5/14/2021	Mark Johnson	0.3	\$1,150	\$345	review and edit draft opposition to mtn for protective order; com w/ GBW re same	Other Motions
5/14/2021	Mark Johnson	3.1	\$1,150	\$3,565	revise add to and finalize draft of section of ltr brief seeking order compelling ESI; com w/ GBW re same and incorporate edits from COC; draft cover email to OC re same	Other Motions
5/14/2021	Mark Johnson	1.8	\$1,150	\$2,070	revise and finalize draft of section of ltr brief seeking order to compel employee-related documents; coms w/ coc re same; draft cover email to OC for same	Other Motions
5/14/2021	Rachel Steyer	0.5	\$750	\$375	weekly meeting with Eidler team and cocounsel to discuss ongoing planning	Case Organization, Planning and Strategy
5/14/2021	Rachel Steyer	3.3	\$750	\$2,475	reviewing opt-out class lists and updating contact info to generate new class member leads	Class Outreach and Contact
5/14/2021	Rachel Steyer	0.5	\$750	\$375	assisting GBW with filling in blanks identified in draft discovery letter brief	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/14/2021	Travis Close	1.0	\$850	\$850	Weekly doc review / team meeting discussing motions to compel, hot documents, service alignment, etc	Case Organization, Planning and Strategy
5/14/2021	Travis Close	0.2	\$850	\$170	Email to GBW, MTJ, RLS re: citations for opposition to motion for protective order	Case Organization, Planning and Strategy
5/14/2021	Travis Close	0.6	\$850	\$510	Review and analyze draft access report by kim blackseth re: fountaingrove facility	Case Organization, Planning and Strategy
5/14/2021	Travis Close	0.4	\$850	\$340	Review and analyze hot docs found by JMP re: service alignment, disciplinary action plans, etc	Discovery (Non-Deposition)
5/14/2021	Travis Close	1.2	\$850	\$1,020	Analyze & create chart of all motions to compel brought by plaintiffs	Discovery (Non-Deposition)
5/14/2021	Travis Close	0.2	\$850	\$170	Email to GBW re: chart for use in opposing protective order	Other Motions
5/14/2021	Travis Close	0.5	\$850	\$425	Review, analyze, & revise draft letter brief re: deficient ESI	Other Motions
5/14/2021	Travis Close	0.7	\$850	\$595	Legal research re: state regulations requiring emergency evacuation and disaster plans for assisted living facilities & CCRCs (for joint letter brief)	Other Motions
5/14/2021	Travis Close	1.2	\$850	\$1,020	Revisions to draft response on motion for protective order re: additonal discovery demands by plaintiffs	Pleadings and Motions Re: Pleadings
5/15/2021	Guy Wallace	1.4	\$1,350	\$1,890	revise and edit putative class member declarations	Class Certification
5/15/2021	Guy Wallace	0.8	\$1,350	\$1,080	revise and edit draft motion to substitute plaintiffs for deceased putative class representatives	Other Motions
5/15/2021	Guy Wallace	1.1	\$1,350	\$1,485	revise and edit opposition to D's motion for protective order re class discovery; MTC's to compel same	Other Motions
5/15/2021	Mark Johnson	0.2	\$1,150	\$230	review GBW latest draft of opposition to protective order and comment on same	Other Motions
5/16/2021	Guy Wallace	3.2	\$1,350	\$4,320	revise and edit class member declarations	Class Certification
5/16/2021	Mark Johnson	0.1	\$1,150	\$115	email to OC GLM re 30b6 depo and doc productoi	Depositions
5/17/2021	Guy Wallace	0.9	\$1,350	\$1,215	com's with RLS re preparation of class member declarations	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/17/2021	Guy Wallace	1.9	\$1,350	\$2,565	preparation of topics and questions for Rule 30(b)(6) depo re ADA	Depositions
5/17/2021	Guy Wallace	1.3	\$1,350	\$1,755	review and analysis of D's access documents and capital budgets	Discovery (Non-Deposition)
5/17/2021	Guy Wallace	1.1	\$1,350	\$1,485	revise and edit motion for substitution of plaintiffs	Other Motions
5/17/2021	Guy Wallace	1.1	\$1,350	\$1,485	revise and edit draft MTC re D's production of staffing reports and data; com's with MTJ re preparation for meet and confer with D's re same	Other Motions
5/17/2021	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re D's failure to produce complete ee time records and data anomalies re same; potential MTC re same	Other Motions
5/17/2021	Mark Johnson	0.8	\$1,150	\$920	calls w/ gbw (x6) re discovery issues and strategy for getting emergency evacuation plans, complete timekeeping data, meet and confer letter on other data, specification of other data needed from Brookdale systems, conversation with Marks re sme	Discovery (Non-Deposition)
5/17/2021	Mark Johnson	0.1	\$1,150	\$115	review and respond to email from OC GLM re additional meet and confer session re multiple items + evac plans and timekeeping data	Discovery (Non-Deposition)
5/17/2021	Mark Johnson	0.3	\$1,150	\$345	emails to staff re research for meet and confer call.	Discovery (Non-Deposition)
5/17/2021	Mark Johnson	6.7	\$1,150	\$7,705	draft and revise letter brief seeking order compelling reports and underlying data; research discovery requests and meet and confer communications for same	Other Motions
5/17/2021	Rachel Steyer	0.7	\$750	\$525	phone call w/GBW to discuss review of class member draft declarations	Class Certification
5/17/2021	Rachel Steyer	0.5	\$750	\$375	editing and revising draft KAJ class member declaration	Class Certification
5/17/2021	Rachel Steyer	2.0	\$750	\$1,500	conducted intake call with class member, updated sharepoint, created client folder	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/17/2021	Rachel Steyer	0.2	\$750	\$150	email to TRB, GBW, MTJ re outreach	Class Outreach and Contact
5/17/2021	Rachel Steyer	2.0	\$750	\$1,500	document review to find and locate capital report budgets as requested by GBW	Discovery (Non-Deposition)
5/17/2021	Rachel Steyer	0.8	\$750	\$600	reviewing org charts to identify additional positions for potential missing job descriptions	Discovery (Non-Deposition)
5/17/2021	Travis Close	0.8	\$850	\$680	Search for & Analyze number of site visits conducted at CA facilities by jeffrey toomer	Case Organization, Planning and Strategy
5/17/2021	Travis Close	0.9	\$850	\$765	Search for & Analyze number of site visits conducted at CA facilities by kevin bowman	Class Certification
5/17/2021	Travis Close	0.8	\$850	\$680	Analyze number of resident services summary reports produced by defendants	Class Certification
5/17/2021	Travis Close	1.1	\$850	\$935	Revisions to revised draft of kevin marquis iso motion for class cert (residency agreement analysis)	Class Certification
5/17/2021	Travis Close	0.4	\$850	\$340	Analyze testimony from theresa ward deposition re: service alignment reports capable of being generated	Depositions
5/17/2021	Travis Close	0.5	\$850	\$425	Analyze testimony from Anna Reddy deposition re: service alignment reports capable of being generated	Depositions
5/17/2021	Travis Close	0.6	\$850	\$510	Analyze depo testimony from Jeffrey Toomer re: reports capable of generation showing acuity minutes, benchmarks, and variances	Depositions
5/17/2021	Travis Close	0.5	\$850	\$425	Analyze jeffre toomer depo testimony for instances where SA and benchmarks were discussed	Depositions
5/17/2021	Travis Close	0.3	\$850	\$255	Review and analyze draft Ps section of joint letter brief on service alignment reports	Discovery (Non-Deposition)
5/17/2021	Travis Close	0.3	\$850	\$255	Email to team re: testimony from jeffrey toomer about aggregate reporting capabilities	Discovery (Non-Deposition)
5/17/2021	Travis Close	1.4	\$850	\$1,190	Legal research re: burden of proof for good cause in justifying a protective order (caselaw, secondary sources)	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/17/2021	Travis Close	0.3	\$850	\$255	Review/analyze revised version of Ps' section opposing protective order	Pleadings and Motions Re: Pleadings
5/17/2021	Travis Close	0.5	\$850	\$425	Review and analyze draft motion for substitution of decease plaintiffs + exhibits	Pleadings and Motions Re: Pleadings
5/18/2021	Guy Wallace	0.7	\$1,350	\$945	review and analysis of letter from Maatman re alleged improper communications with putative class members; com's with MTJ; RLS re same	Communications With Opposing Counsel
5/18/2021	Guy Wallace	2.8	\$1,350	\$3,780	preparation of topics, questions and exhibits for PMK depo re ADA compliance	Depositions
5/18/2021	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re preparation for 5/19 meet and confer re various discovery issues	Discovery (Non-Deposition)
5/18/2021	Mark Johnson	1.5	\$1,150	\$1,725	investigate allegations of alleged misconduct in connection with contact with putative class members, including coms w/ RLS, Thomas Barnett, calls with K DeLeon and K Johnson, review notes.	Class Certification
5/18/2021	Mark Johnson	2.0	\$1,150	\$2,300	draft ltr to OC GLM in response to ltr making accusations of misconduct in contacting putative class members	Class Outreach and Contact
5/18/2021	Mark Johnson	0.5	\$1,150	\$575	review ltr from OC making accusations of misconduct in calls to putative cass members; call w GBW re same, draft email to CHC re recommendations for response.	Class Outreach and Contact
5/18/2021	Mark Johnson	1.0	\$1,150	\$1,150	work on depo outline for 30(b)(6) topic 5	Depositions
5/18/2021	Mark Johnson	0.7	\$1,150	\$805	review docs gathered by CC and RLS and TCC for meet and confer session, including list of missing evac reports, list of potentially relevant job descriptions.	Discovery (Non-Deposition)
5/18/2021	Mark Johnson	0.6	\$1,150	\$690	prepare outline of issues and proposals for meet and confer session with OC on multiple topics	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/18/2021	Mark Johnson	1.8	\$1,150	\$2,070	further review of service alignment reports and prepare chart of relevant fields to demand in meet and confer	Discovery (Non-Deposition)
5/18/2021	Mark Johnson	0.2	\$1,150	\$230	email coms w/ J Thornton re data issues for meet and confer w/ OC	Discovery (Non-Deposition)
5/18/2021	Rachel Steyer	1.5	\$750	\$1,125	editing and reviewing four draft class member declarations prepared by KDL	Class Certification
5/18/2021	Rachel Steyer	0.5	\$750	\$375	email to GBW, MTJ, TRB re outreach	Class Outreach and Contact
5/18/2021	Rachel Steyer	0.4	\$750	\$300	received check in phone call from class member who wanted case update, provided answers and timeline	Class Outreach and Contact
5/18/2021	Rachel Steyer	0.4	\$750	\$300	conducting specific document searches based on job descriptions/positioned outlined by MTJ in letter brief to opposing counsel	Discovery (Non-Deposition)
5/18/2021	Rachel Steyer	3.4	\$750	\$2,550	reviewing organizational charts to identify additional job titles whose job descriptions are relevant per discovery requests, preparing document for MTJ	Discovery (Non-Deposition)
5/18/2021	Rachel Steyer	0.2	\$750	\$150	response to GBW with various questions about ADA docs in preparation for 30b6 depo	Discovery (Non-Deposition)
5/18/2021	Rachel Steyer	0.8	\$750	\$600	reviewing ADA documents for 30b6 depo	Discovery (Non-Deposition)
5/18/2021	Travis Close	0.3	\$850	\$255	Email to MTJ, RLS re: searches for additional job descriptions	Discovery (Non-Deposition)
5/18/2021	Travis Close	0.2	\$850	\$170	Email to MTJ re: indexing new production of job descriptions	Discovery (Non-Deposition)
5/18/2021	Travis Close	0.8	\$850	\$680	Search for unique, new job descriptions produced and begin indexing	Discovery (Non-Deposition)
5/18/2021	Travis Close	1.2	\$850	\$1,020	Continue indexing unique, newly produced job descriptions produced	Discovery (Non-Deposition)
5/18/2021	Travis Close	0.9	\$850	\$765	Continue drafting GBW dec iso motion for fees (background and credentials)	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/19/2021	Guy Wallace	3.2	\$1,350	\$4,320	review and analysis of draft reports from Waters; com's with MTJ re same (.5)	Class Certification
5/19/2021	Guy Wallace	1.8	\$1,350	\$2,430	review and analysis of ADA and emergency evacuation documents; com's with MTJ; TCC; RLS; CC re same	Discovery (Non-Deposition)
5/19/2021	Guy Wallace	1.4	\$1,350	\$1,890	com's with Marks; Thornton; MTJ re Brookdale reports and data fields; preparation of staffing analysis and critique of norms	Experts (Including Retention)
5/19/2021	Mark Johnson	0.5	\$1,150	\$575	review 2020 9th circuit decision re burden shifting on issue of readily achievable; review DOJ regs setting forth items considered readily achievable	Class Certification
5/19/2021	Mark Johnson	0.7	\$1,150	\$805	calls w/ GBW (x4) re expert reports, barrier removal, readily achievable burden, identification of newly constructed facilities, ADA issues and potential exhibits for 30(b)(6) depo	Class Certification
5/19/2021	Mark Johnson	1.7	\$1,150	\$1,955	work on outline for staffing 30(b)(6) deposition; review potential exhibits for incorporation into same.	Depositions
5/19/2021	Mark Johnson	0.2	\$1,150	\$230	review docs from production identified by C Craig and TCC for 30b6 access depo	Depositions
5/19/2021	Mark Johnson	1.2	\$1,150	\$1,380	meet and confer call with OC Jacobsen and Vick and AX, GBW, Styer, Close re 8 topics (see outline)	Discovery (Non-Deposition)
5/19/2021	Mark Johnson	0.2	\$1,150	\$230	calls x2 w/ GBW re follow-up on meet and confer call, including points made re reports and data	Discovery (Non-Deposition)
5/19/2021	Mark Johnson	0.3	\$1,150	\$345	call w/ AX, RLS, TLC - prep for meet and confer call	Discovery (Non-Deposition)
5/19/2021	Mark Johnson	1.4	\$1,150	\$1,610	call w/ Marks and Thornton re data reports and info for expert analysis; review reports and discuss framework for demand for underlying data	Discovery (Non-Deposition)
5/19/2021	Mark Johnson	1.5	\$1,150	\$1,725	work up issues for discussion w/ Marks and Thornton re data demands in meet and confer call with OC, including review of data reports, prior emails	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/19/2021	Mark Johnson	0.3	\$1,150	\$345	draft email to OC re emergency/disaster/evacuation plans and prepare list of facilities for which no supplemental plans have been produced.	Discovery (Non-Deposition)
5/19/2021	Mark Johnson	0.2	\$1,150	\$230	draft email to Marks/Thornton re Kronos data and structured labor detail reports for expert consideration	Experts (Including Retention)
5/19/2021	Rachel Steyer	0.2	\$750	\$150	meeting with MTJ, TCC, and co-counsel to review before meet and confer	Case Organization, Planning and Strategy
5/19/2021	Rachel Steyer	1.1	\$750	\$825	editing and revising draft KDL class member declaration	Class Certification
5/19/2021	Rachel Steyer	0.2	\$750	\$150	email to KAJ following review of draft delcaration	Class Certification
5/19/2021	Rachel Steyer	1.1	\$750	\$825	editing and organizing and reviewing class member declarations for co-counsel	Class Certification
5/19/2021	Rachel Steyer	0.3	\$750	\$225	spoke with class member to continue intake, she had not yet had chance to review documents, rescheduled call	Class Outreach and Contact
5/19/2021	Rachel Steyer	3.3	\$750	\$2,475	ongoing document review to follow up on specific issues identified by GBW in preparation for ADA 30b6 depo	Depositions
5/19/2021	Travis Close	0.2	\$850	\$170	Email to CAC re: ownership and asset management emails produced	Case Organization, Planning and Strategy
5/19/2021	Travis Close	0.8	\$850	\$680	Analyze prior history of proposed custodians to find positions and people related to asset management	Case Organization, Planning and Strategy
5/19/2021	Travis Close	0.2	\$850	\$170	Email to GBW re: Chris Odmark and brookdale's designed people for facility assess management and procurement	Case Organization, Planning and Strategy
5/19/2021	Travis Close	0.6	\$850	\$510	Analyze transcript of Anna Reddy for testimony re: centralized records of employee training and training materials	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/19/2021	Travis Close	0.2	\$850	\$170	Email to MTJ re: identities of David Hammonds and Christopher Galante associated with asset management	Case Organization, Planning and Strategy
5/19/2021	Travis Close	0.2	\$850	\$170	Call with GBW re: organizing facility blueprints for experts	Case Organization, Planning and Strategy
5/19/2021	Travis Close	1.2	\$850	\$1,020	Review/analyze all PCR reports (facility asset condition/review) in our production discussing accessibility standards: BKD2319325 (Bakersfield), BKD2319349 (Santa Monica), BKD2319426 (Fountaingrove), BKD2494138 (North Euclid), BKD2275291 (Mirage Inn), BKD2274355 (Oceanside), BKD2275293 (San Marcos), BKD2274119 (Clairemont), BKD2272840 (Riverside), BKD2272834 (Sunwest), BKD2272832 (Cherry Hills), BKD2253084 (Chanate)	Class Certification
5/19/2021	Travis Close	0.3	\$850	\$255	Email to team with list of PCR reports discussing asset condition and accessibility standards at brookdale facilities	Class Certification
5/19/2021	Travis Close	0.7	\$850	\$595	Review and analyze transcript of Theresa Ward for testimony re: centralized records of employee training	Depositions
5/19/2021	Travis Close	0.4	\$850	\$340	Meet with MTJ, AXU, and RLS before today's M/C call with defendants to discuss discovery strategy	Discovery (Non-Deposition)
5/19/2021	Travis Close	1.2	\$850	\$1,020	Meet and confer telephone calls with MTJ, AXU, and defendants (Michael jacobson, jordan vick) re: deficient responses to discovery requests: job descriptions, emergency evacuation plans, training records, and variance reports & underlying data	Discovery (Non-Deposition)
5/19/2021	Travis Close	0.7	\$850	\$595	Targeted search -- chris Odmark and "access*" or "accessibl*" (assest management)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/20/2021	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW re timing of topic 5 30(b)(6) depo and proposed position w. OC re same, potential ways for addressing IDK witnesses; also review of expert reports and issues	Case Organization, Planning and Strategy
5/20/2021	Mark Johnson	2.7	\$1,150	\$3,105	continue working on outline of Rule 30b6 depo on topic 5, including review of potential exhibits	Depositions
5/20/2021	Mark Johnson	0.2	\$1,150	\$230	draft email to OC GLM re timing of topic 5 depo for 30b6 depo; request to meet and confer re same	Depositions
5/20/2021	Mark Johnson	2.3	\$1,150	\$2,645	sort and review spreadsheet purporting to be structured labor detail report and analyze same; prepare chart displaying structure, identify missing data	Discovery (Non-Deposition)
5/20/2021	Mark Johnson	0.3	\$1,150	\$345	draft email to Marks/Thornton describing review and analysis of structured labor detail spreadsheet and seeking opinion re same	Discovery (Non-Deposition)
5/20/2021	Mark Johnson	0.3	\$1,150	\$345	pull and review sample supp emergency plan and emergency plans and forward to OC with cover email per request in meet and confer	Discovery (Non-Deposition)
5/20/2021	Mark Johnson	0.2	\$1,150	\$230	review updated spreadsheet of personnel report production and com w/ K Stilber re same	Discovery (Non-Deposition)
5/20/2021	Mark Johnson	2.0	\$1,150	\$2,300	review portions of Chanate and San Juan Capistrano expert reports	Experts (Including Retention)
5/20/2021	Rachel Steyer	0.6	\$750	\$450	editing and revising class member declaration following GBW feedback	Class Certification
5/20/2021	Rachel Steyer	0.6	\$750	\$450	editing and revising class member declaration	Class Certification
5/20/2021	Rachel Steyer	0.4	\$750	\$300	editing and revision class member declaration	Class Certification
5/20/2021	Rachel Steyer	0.4	\$750	\$300	editing and revising class member declaration	Class Certification
5/20/2021	Rachel Steyer	0.9	\$750	\$675	editing and reviewing class member declaration	Class Certification
5/20/2021	Rachel Steyer	0.7	\$750	\$525	editing and reviewing class member declaration	Class Certification
5/20/2021	Rachel Steyer	1.1	\$750	\$825	editing and revising class member declaration	Class Certification
5/20/2021	Rachel Steyer	0.5	\$750	\$375	editing and revising draft declaration	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/20/2021	Rachel Steyer	0.3	\$750	\$225	editing and revision class member declaration	Class Certification
5/20/2021	Rachel Steyer	0.4	\$750	\$300	editing and revising class member declaration	Class Certification
5/20/2021	Rachel Steyer	0.4	\$750	\$300	weekly outreach meeting	Class Outreach and Contact
5/20/2021	Rachel Steyer	0.2	\$750	\$150	providing draft declarations to co-counsel for review pre meeting to discuss finalizing declarations	Class Outreach and Contact
5/21/2021	Guy Wallace	0.5	\$1,350	\$675	preparation of notes re editing putative class member declarations	Class Certification
5/21/2021	Guy Wallace	1.1	\$1,350	\$1,485	team call re putative class member declarations	Class Certification
5/21/2021	Guy Wallace	0.3	\$1,350	\$405	com's with RLS re putative class member declarations	Class Certification
5/21/2021	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re Rule 30(b)(6) depo schedule	Depositions
5/21/2021	Guy Wallace	0.3	\$1,350	\$405	analysis of content of Labor Detail Reports and MTJ email re same	Discovery (Non-Deposition)
5/21/2021	Guy Wallace	0.5	\$1,350	\$675	com's with Waters re draft expert reports	Experts (Including Retention)
5/21/2021	Guy Wallace	0.3	\$1,350	\$405	com's with TCC; EAO re provision of building department files to Waters and Mastin	Experts (Including Retention)
5/21/2021	Guy Wallace	5.7	\$1,350	\$7,695	review and analysis of Waters draft facility reports	Experts (Including Retention)
5/21/2021	Guy Wallace	0.6	\$1,350	\$810	review and analysis re D's opposition to P's MTC re ESI; com's with MTJ re edits to same	Other Motions
5/21/2021	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW re discovery and motion to compel issues	Case Organization, Planning and Strategy
5/21/2021	Mark Johnson	0.5	\$1,150	\$575	meeting of document team re ongoing assignments for doc review for depositions	Class Certification
5/21/2021	Mark Johnson	1.5	\$1,150	\$1,725	mtg of litigation team re outstanding discovery issues, depo schedule, motions to compel and review of class member declarations	Class Certification
5/21/2021	Mark Johnson	0.4	\$1,150	\$460	review and draft response to OC re scheduling topic 5 30b6 depo; review and respond to further email re same, demand meet and confer	Depositions
5/21/2021	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW re stratgey for addressing dispute over timing of topic 5 of 30b6 depo	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/21/2021	Mark Johnson	1.2	\$1,150	\$1,380	draft email/memo re analysis of labor detail report and comparisom to structured labor detail reports for Marks/Thornton	Discovery (Non-Deposition)
5/21/2021	Mark Johnson	0.1	\$1,150	\$115	drafrt follow-up email seeing reponse to email re missing assessment / move-in data	Discovery (Non-Deposition)
5/21/2021	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW draft expert reports	Experts (Including Retention)
5/21/2021	Mark Johnson	0.3	\$1,150	\$345	finalized and send ltr to OC GLM in response to ltr accusing frim of improper communictions with class members	Other Motions
5/21/2021	Mark Johnson	1.7	\$1,150	\$1,955	review D draft section of ltr brief re missing ESI; re-work P section to address arguments made; review and incorporate edits from COC; draft email cover and send to oc	Other Motions
5/21/2021	Rachel Steyer	1.5	\$750	\$1,125	weekly team meeting to discuss ongoing efforts and tasks	Case Organization, Planning and Strategy
5/21/2021	Rachel Steyer	0.5	\$750	\$375	editing and revising class member declaration	Class Certification
5/21/2021	Rachel Steyer	0.4	\$750	\$300	editing and reviewing class member declaration	Class Certification
5/21/2021	Rachel Steyer	0.5	\$750	\$375	editing and revising class member declaration	Class Certification
5/21/2021	Rachel Steyer	0.2	\$750	\$150	phone call wkth GBW with questions re declaratiosn	Class Certification
5/21/2021	Rachel Steyer	0.7	\$750	\$525	speaking with class member about finalizing declaration, answering questions about case	Class Certification
5/21/2021	Rachel Steyer	0.2	\$750	\$150	reviewing defendants section of joint letter brief re 2021 ESI	Discovery (Non-Deposition)
5/21/2021	Rachel Steyer	4.1	\$750	\$3,075	document review for ADA 30b6 deposition	Discovery (Non-Deposition)
5/21/2021	Travis Close	0.7	\$850	\$595	Analyze history of ESI negotiations & proposed search terms for joint letter brief revisions	Case Organization, Planning and Strategy
5/21/2021	Travis Close	1.8	\$850	\$1,530	Weekly doc review & general meeting call with MTJ, GBW, RLS, and co-counsel -- discussing motions to compel, ESI, expert reports, and class member declarations	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/21/2021	Travis Close	0.3	\$850	\$255	Email to EPO re: instructions for new assignment in compiling facility blueprints	Class Certification
5/21/2021	Travis Close	0.4	\$850	\$340	Email to EPO re: updates on gathering blueprints for access expert	Class Certification
5/21/2021	Travis Close	0.5	\$850	\$425	Edits/revisions to ESI joint letter brief	Discovery (Non-Deposition)
5/21/2021	Travis Close	1.4	\$850	\$1,190	Analyze status of organization of facility blueprints for expert reports	Experts (Including Retention)
5/21/2021	Travis Close	0.8	\$850	\$680	Analyze status of facility blueprint production from Corona facility (whether to seek additional blueprints from city of corona)	Experts (Including Retention)
5/22/2021	Guy Wallace	1.7	\$1,350	\$2,295	review and analysis of Waters draft facility reports	Experts (Including Retention)
5/23/2021	Guy Wallace	4.8	\$1,350	\$6,480	review and analysis of draft facility reports from Waters	Experts (Including Retention)
5/24/2021	Guy Wallace	2.4	\$1,350	\$3,240	review and analysis of draft facilities report from Mastin; preparation of comments re same	Class Certification
5/24/2021	Guy Wallace	0.5	\$1,350	\$675	revise and edit draft declarations of putative class members; com's with RLS re same	Class Certification
5/24/2021	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ re whether Defendants have produced non-ESI documents from 2020-21; legal research re Rule 26(e) duty to supplement	Discovery (Non-Deposition)
5/24/2021	Guy Wallace	0.5	\$1,350	\$675	com's with Waters re draft facilities reports	Experts (Including Retention)
5/24/2021	Guy Wallace	0.3	\$1,350	\$405	com's with Mastin re draft facilities reports	Experts (Including Retention)
5/24/2021	Guy Wallace	0.5	\$1,350	\$675	review and analysis of D's portions of motion for protective order; MTC re incomplete ESI production; com's with MTJ re same	Other Motions
5/24/2021	Mark Johnson	3.7	\$1,150	\$4,255	review and edit declarations of absent class members	Class Certification
5/24/2021	Mark Johnson	3.0	\$1,150	\$3,450	review records of inspections, reports and prior notes and prepare chart of inspected facilities and status	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/24/2021	Mark Johnson	0.8	\$1,150	\$920	calls (x5) w/ GBW re inspection reports, outstanding discovery, motions to compel and 30(b)(6) depo topic 5	Class Certification
5/24/2021	Mark Johnson	0.2	\$1,150	\$230	com w/ TCC re blueprints for access experts; review sample of same for Alhambra	Experts (Including Retention)
5/24/2021	Mark Johnson	0.5	\$1,150	\$575	review revised ltr briefs on missing ESI and protective order and coms w/ GWB and RBGG re same	Other Motions
5/24/2021	Rachel Steyer	0.3	\$750	\$225	phone call with class member declarant to verify status of declaration and inform her that cocounsel will call to finalize	Class Certification
5/24/2021	Rachel Steyer	0.3	\$750	\$225	phone call with class member to update about status of declaration	Class Certification
5/24/2021	Rachel Steyer	0.2	\$750	\$150	phone call with class member to review finalizing declaration process	Class Certification
5/24/2021	Rachel Steyer	0.2	\$750	\$150	phone call with class member to discuss finalizing declaration process	Class Certification
5/24/2021	Rachel Steyer	0.3	\$750	\$225	phone call with class member declarant to review process of finalizing declaration	Class Certification
5/24/2021	Rachel Steyer	0.2	\$750	\$150	phone call with class member to review process of finalizing declaration	Class Certification
5/24/2021	Rachel Steyer	0.4	\$750	\$300	phone call with class member to review process of finalizing declaration	Class Certification
5/24/2021	Rachel Steyer	0.2	\$750	\$150	phone call with class member declarant to review process of finalizing declaration	Class Certification
5/24/2021	Rachel Steyer	0.2	\$750	\$150	phone call with class member to review process of finalizing declaration	Class Certification
5/24/2021	Rachel Steyer	0.2	\$750	\$150	phone call with class member to review process of finalizing declaration	Class Certification
5/24/2021	Rachel Steyer	0.3	\$750	\$225	call back from class member, provided information about process of finalizing declaration	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/24/2021	Rachel Steyer	0.4	\$750	\$300	phone call with class member to discuss declaration finalizing process	Class Certification
5/24/2021	Rachel Steyer	0.2	\$750	\$150	reviewing MTJ's edits in class member declaration, incorporating and revising declaration accordingly	Class Certification
5/24/2021	Rachel Steyer	0.3	\$750	\$225	making slight additional edits to draft declaration before resending to GBW for review	Class Certification
5/24/2021	Rachel Steyer	0.5	\$750	\$375	editing and revising two class member declarations and preparing for GBW review	Class Certification
5/24/2021	Rachel Steyer	0.3	\$750	\$225	reviewing and incorporating MTJ declaration edits	Class Certification
5/24/2021	Rachel Steyer	0.3	\$750	\$225	editing and reviewing MTJ edits to class member declaration, incorporating into draft	Class Certification
5/24/2021	Rachel Steyer	0.5	\$750	\$375	editing and reviewing class member declarations to send to co-counsel for final review	Class Certification
5/24/2021	Rachel Steyer	0.3	\$750	\$225	phone call from class member, discussed case, requested additional info/email	Class Outreach and Contact
5/24/2021	Rachel Steyer	0.3	\$750	\$225	updating declaration/intake tracking spreadsheet	Class Outreach and Contact
5/24/2021	Travis Close	0.2	\$850	\$170	Email to MTJ re: chart organizing facility inspection data	Case Organization, Planning and Strategy
5/24/2021	Travis Close	0.4	\$850	\$340	Email to EPO re: updates on organization of facility blueprints to share with access experts	Case Organization, Planning and Strategy
5/24/2021	Travis Close	1.3	\$850	\$1,105	Analyze extent of missing building records for Brookdale Alhambra facility / City of Alhambra production	Case Organization, Planning and Strategy
5/24/2021	Travis Close	0.4	\$850	\$340	Analyze draft of 30(b)(6) notices and search for operative version of notice for BMU (co-counsel)	Depositions
5/24/2021	Travis Close	0.2	\$850	\$170	Email to BMU re: operative version of 30(b)(6) notice	Depositions
5/24/2021	Travis Close	0.4	\$850	\$340	Email to GBW, MTJ re: next steps for missing building records	Discovery (Non-Deposition)
5/24/2021	Travis Close	0.3	\$850	\$255	Research contact info from Alhambra building department	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/24/2021	Travis Close	0.2	\$850	\$170	Email to access experts re: blueprints now on Dropbox for downloading	Experts (Including Retention)
5/24/2021	Travis Close	0.3	\$850	\$255	Review and analyze latest draft of letter briefs re: ESI and motion for protective order	Pleadings and Motions Re: Pleadings
5/25/2021	Guy Wallace	5.1	\$1,350	\$6,885	revise and edit putative class member declarations	Class Certification
5/25/2021	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ; RLS re putative class member declarations	Class Certification
5/25/2021	Guy Wallace	0.9	\$1,350	\$1,215	com's with MTJ re preparation for deposition re facility construction history and ADA issues; analysis of same	Depositions
5/25/2021	Guy Wallace	0.8	\$1,350	\$1,080	com's with BU; MTJ re preparation for deposition re own or operate issue; legal research re standard for definition of same under Title III of the ADA	Discovery (Non-Deposition)
5/25/2021	Mark Johnson	1.8	\$1,150	\$2,070	coms w/ GBW (x4) re class member decs, ltr briefs, discovery issues, expert reports	Class Certification
5/25/2021	Mark Johnson	1.2	\$1,150	\$1,380	review / edit class member decs iso class cert	Class Certification
5/25/2021	Mark Johnson	0.9	\$1,150	\$1,035	research re owner / operator liability under ADA	Class Certification
5/25/2021	Mark Johnson	0.7	\$1,150	\$805	call w/ Brian U., GBW re topic 3 of 30b6 depo re ownership	Depositions
5/25/2021	Mark Johnson	0.4	\$1,150	\$460	review outline from BSU re topic 3 owner/operator depo; com w/ BSU re Bowman declaration and rogs on same issue	Depositions
5/25/2021	Mark Johnson	0.4	\$1,150	\$460	draft emails to ADA experts re info re construction history, stip re typicality of untis	Experts (Including Retention)
5/25/2021	Mark Johnson	0.7	\$1,150	\$805	final review of missing ESI ltr brief and protective order ltrb brief; draft email to OC re same and arrange for filing.	Other Motions
5/25/2021	Rachel Steyer	0.4	\$750	\$300	editing and reviewing class member declaration, incorporating MTJ edits	Class Certification
5/25/2021	Rachel Steyer	0.7	\$750	\$525	editing and revising class member declaration	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/25/2021	Rachel Steyer	0.3	\$750	\$225	editing adn revising class member declaration in preparation to send to GBW and MTJ for further review	Class Certification
5/25/2021	Rachel Steyer	0.3	\$750	\$225	editing and revising class member declaration before sending to MTJ and GBW for further review	Class Certification
5/25/2021	Rachel Steyer	0.7	\$750	\$525	editing and revising class member declaration before sending to GBW and MTJ for review	Class Certification
5/25/2021	Rachel Steyer	0.4	\$750	\$300	editing and revising class member declaration to send to GBW and MTJ for review	Class Certification
5/25/2021	Rachel Steyer	0.7	\$750	\$525	phone call with class member declarant to review a few additional questions while revising declaration, review process of finalizing declaration	Class Outreach and Contact
5/25/2021	Rachel Steyer	0.3	\$750	\$225	email to RBGG co-counsel re finalizing declarations project and info to provide to declarants re arbitration status	Class Outreach and Contact
5/25/2021	Travis Close	1.6	\$850	\$1,360	Review/analyze architectural drawings produced by Brookdale for references to ADA & accessibility standards	Case Organization, Planning and Strategy
5/25/2021	Travis Close	0.7	\$850	\$595	Review and analyze draft report from Jeff Mastin (expert) re: boilerplate accessibility items & opportunity for macros	Class Certification
5/25/2021	Travis Close	1.3	\$850	\$1,105	Review and analyze complaints by Plaintiffs/class members filed to Sue Ramsey at Fountaingrove facility during her tenure there	Class Certification
5/25/2021	Travis Close	0.6	\$850	\$510	Analyze correspondance between plaintiffs and Shawn cull re: emergency evacuation plans at san ramon	Class Certification
5/25/2021	Travis Close	0.9	\$850	\$765	Analyze records of Jean Schilling between November-December 2016, including complaint to management followed by her death several days later	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/25/2021	Travis Close	1.0	\$850	\$850	Continue chart of List of Key Facts for Class cert (family and resident council complaints)	Class Certification
5/25/2021	Travis Close	0.8	\$850	\$680	Continue filling in chart of List of Key Facts for Class cert (admissions by former EDs re: service alignment)	Class Certification
5/25/2021	Travis Close	0.4	\$850	\$340	Review and analyze final version of Ds motion for protective order on discovery + exhibits	Discovery (Non-Deposition)
5/26/2021	Guy Wallace	1.1	\$1,350	\$1,485	revise and edit draft class member declarations; com's with MTJ; RLS re same	Class Certification
5/26/2021	Guy Wallace	1.8	\$1,350	\$2,430	preparation of topics and questions for Rule 30(b)(6) depo re ADA	Depositions
5/26/2021	Guy Wallace	0.6	\$1,350	\$810	com's with Waters; MTJ; TCC; EPO re preparation of construction history re alterations to Brookdale's assisted living facilities	Discovery (Non-Deposition)
5/26/2021	Guy Wallace	0.8	\$1,350	\$1,080	com's with Waters; Mastin; GG; MTJ re preparation of draft facilities reports	Experts (Including Retention)
5/26/2021	Guy Wallace	0.6	\$1,350	\$810	revise and edit draft letter re Service Alignment databases; com's with MTJ re same	Other Motions
5/26/2021	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ re MTCs re employment-related documents; training materials; operations plans	Other Motions
5/26/2021	Mark Johnson	2.8	\$1,150	\$3,220	review and comment on / edit drat class member declarations	Class Certification
5/26/2021	Mark Johnson	0.6	\$1,150	\$690	call w GBW, GCG and experts Waters and Mastin re status of inspection reports, reporting methodology and technical support	Experts (Including Retention)
5/26/2021	Mark Johnson	0.4	\$1,150	\$460	review memo and report templates from Mastin for conference call	Experts (Including Retention)
5/26/2021	Mark Johnson	2.3	\$1,150	\$2,645	draft/revise ltr brief section on data reports and underlying data	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/26/2021	Mark Johnson	1.2	\$1,150	\$1,380	review D section of ltr brief on job descriptions, bonus materials and performance reviews; revise P section to address arguments; email exchanges w/ OC re same; email to COC for input.	Other Motions
5/26/2021	Rachel Steyer	0.4	\$750	\$300	editing and revising draft KDL class member declaration	Case Organization, Planning and Strategy
5/26/2021	Rachel Steyer	1.2	\$750	\$900	editing and revising draft KAJ class member declaration	Class Certification
5/26/2021	Rachel Steyer	0.3	\$750	\$225	editing class member declaration before sending to GBW/MTJ for further review	Class Certification
5/26/2021	Rachel Steyer	0.2	\$750	\$150	received call back from class member declarant, explained finalization process	Class Certification
5/26/2021	Rachel Steyer	0.7	\$750	\$525	editing and revising class member declaration before sending to GBW/MTJ for further review	Class Certification
5/26/2021	Rachel Steyer	0.6	\$750	\$450	editing and revising class member declaration before sending to GBW and MTJ for further review	Class Certification
5/26/2021	Rachel Steyer	0.5	\$750	\$375	editing and revising class member declaration before sending to GBW and MTJ for further review	Class Certification
5/26/2021	Rachel Steyer	0.5	\$750	\$375	editing and revising draft KAJ class member declaration	Class Certification
5/26/2021	Rachel Steyer	0.2	\$750	\$150	received call back from class member, schedule time to continue intake started by RVR	Class Outreach and Contact
5/26/2021	Travis Close	1.1	\$850	\$935	Review and analyze resident council minutes from Brookdale Windsor re: bad food and understaffing concerns	Case Organization, Planning and Strategy
5/26/2021	Travis Close	0.9	\$850	\$765	Begin organizing records of alterations found in Chris Odmark custodial documents	Case Organization, Planning and Strategy
5/26/2021	Travis Close	1.5	\$850	\$1,275	Review and analyze documents cited from Defendants' amended responses to interrogatories re: records showing new construction and alteration	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/26/2021	Travis Close	0.3	\$850	\$255	Analyze PCR/capital plan for San Ramon facility, and items to be completed in 2021-2024	Case Organization, Planning and Strategy
5/26/2021	Travis Close	0.8	\$850	\$680	Analyze results for Brookdale's Requisition Approval System by asset management; organization and capabilities; data points and whether alterations are included	Case Organization, Planning and Strategy
5/26/2021	Travis Close	0.4	\$850	\$340	Analyze recent hot documents found by JMP re: Service alignment. understaffing concerns	Class Certification
5/26/2021	Travis Close	0.3	\$850	\$255	Email to EPO re: new assignment in analyzing new construction and alterations data found in building records	Class Certification
5/26/2021	Travis Close	0.4	\$850	\$340	Review and analyze property condition report & capital plan for Brookdale Citrus Heights facility (including planned alterations)	Class Certification
5/26/2021	Travis Close	1.2	\$850	\$1,020	Analyze records produced for Kevin T Wallace (senior director fo capital planning) re building alterations	Class Certification
5/26/2021	Travis Close	0.4	\$850	\$340	Analyze scope of work for Pauling Creek facility Jan 2020 rennovation, including for any alterations performed	Class Certification
5/26/2021	Travis Close	0.6	\$850	\$510	Analyze spreadsheet showing rennovations completed and descriptions of rennovations for all Brookdale CA facilities	Class Certification
5/27/2021	Guy Wallace	0.3	\$1,350	\$405	com's with RLS; TB re putative class member outreach and declarations	Class Certification
5/27/2021	Guy Wallace	1.7	\$1,350	\$2,295	preparation of topics, questions and exhibits re Rule 30(b)(6) depo re ADA compliance	Depositions
5/27/2021	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of chart of D's construction since 1999; com's with MTJ; TCC re same	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/27/2021	Guy Wallace	0.8	\$1,350	\$1,080	com's with CC re documents re D's construction; surveys of facilities	Discovery (Non-Deposition)
5/27/2021	Guy Wallace	1.5	\$1,350	\$2,025	legal research and analysis re successor liability for new construction and alterations; com's with JRA; MTJ re same	Misc. Research
5/27/2021	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ re MTCs and meet and confer efforts re outstanding discovery items	Other Motions
5/27/2021	Mark Johnson	1.3	\$1,150	\$1,495	calls w/ GBW (x5) re motions to compel, discovery issues, rog responses relying on Rule 33(d)	Case Organization, Planning and Strategy
5/27/2021	Mark Johnson	0.2	\$1,150	\$230	emails w/ GBW re training depo scheduling; review and forward past email to OC re production of training materials and depo	Depositions
5/27/2021	Mark Johnson	0.3	\$1,150	\$345	email exchanges w. OC re depo on topic 16, history of past correspondence and positions re same.	Depositions
5/27/2021	Mark Johnson	0.5	\$1,150	\$575	review consolidated renovation spreadsheet found by TCC; raise ownership issues from same and review memo frm TCC re consolidated ownership	Discovery (Non-Deposition)
5/27/2021	Mark Johnson	0.3	\$1,150	\$345	email exchanges w/ OC GLM and /Vick re rog responses on alterations, meeting and conferring re same	Discovery (Non-Deposition)
5/27/2021	Mark Johnson	0.4	\$1,150	\$460	revise, finalize and send draft section of joint letter on data to OC with cover letter.,	Other Motions
5/27/2021	Mark Johnson	0.4	\$1,150	\$460	review edits from OC to draft ltr brief re employee related docs; email coms w/ GBW re same; email to OC re final approval, coms w/ LEC re filing	Other Motions
5/27/2021	Mark Johnson	5.8	\$1,150	\$6,670	work on draft section of brief on training, review discovery request and responses and documents for same	Other Motions
5/27/2021	Rachel Steyer	0.5	\$750	\$375	editing and revising class member declaration before sending to GBW and MTJ for review	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/27/2021	Rachel Steyer	0.5	\$750	\$375	editing and revising draft class member declaration before sending to GBW and MTJ for further review	Class Certification
5/27/2021	Rachel Steyer	0.7	\$750	\$525	editing and revising draft class member declaration prior to sending to GBW and MTJ for further review	Class Certification
5/27/2021	Rachel Steyer	0.6	\$750	\$450	editing and revising draft class member declaration before sending to GBW and MTJ for further review	Class Certification
5/27/2021	Rachel Steyer	0.4	\$750	\$300	editing and revising draft class member declaration before sending to GBW and MTJ for further review	Class Certification
5/27/2021	Rachel Steyer	0.5	\$750	\$375	editing and revising draft class member declaration before sending to GBW and MTJ for further review	Class Certification
5/27/2021	Rachel Steyer	0.4	\$750	\$300	editing and revising draft class member declaration before sending to GBW and MTJ for further review	Class Certification
5/27/2021	Rachel Steyer	0.2	\$750	\$150	editing draft declaration template to incorporate general formatting and stylistic edits/feedback from GBW	Class Certification
5/27/2021	Rachel Steyer	0.6	\$750	\$450	editing and revising class member declaration before sending to GBW and MTJ for review	Class Certification
5/27/2021	Rachel Steyer	0.5	\$750	\$375	editing and reviewing draft KAJ class member declaration	Class Certification
5/27/2021	Rachel Steyer	0.2	\$750	\$150	incorporating GBW and MTJ edits in declaration	Class Certification
5/27/2021	Rachel Steyer	0.3	\$750	\$225	reviewing and updating declaration, incorporating MTJ edits	Class Certification
5/27/2021	Rachel Steyer	0.2	\$750	\$150	reviewing and incorporating GBW and MTJ edits to declaration	Class Certification
5/27/2021	Rachel Steyer	0.2	\$750	\$150	incorporating MTJ edits into draft declaration	Class Certification
5/27/2021	Rachel Steyer	0.5	\$750	\$375	editing and revising class member declaration before sending to GBW and MTJ for further review	Class Certification
5/27/2021	Rachel Steyer	0.4	\$750	\$300	reviewing total number of declarations and status of drafts	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/27/2021	Travis Close	0.2	\$850	\$170	email to EPO re: status of identifying alterations at facilities between 2014-2019	Case Organization, Planning and Strategy
5/27/2021	Travis Close	0.2	\$850	\$170	Call with GBW re: alterations identification assignment	Case Organization, Planning and Strategy
5/27/2021	Travis Close	0.6	\$850	\$510	Email to MTJ, GBW re: definition and analysis of use of the term "consolidated" as used in asset management documents	Case Organization, Planning and Strategy
5/27/2021	Travis Close	1.3	\$850	\$1,105	Continue analyzing results for "consolidated" and "unconsolidated" in asset management documents under custodian Christopher Odmark	Case Organization, Planning and Strategy
5/27/2021	Travis Close	1.5	\$850	\$1,275	Analyze Brookdale's financial statements and press releases for 2014-present for use of the term "consolidated ventures" vs unconsolidated	Case Organization, Planning and Strategy
5/27/2021	Travis Close	0.4	\$850	\$340	Review and analyze draft revised letter brief re: training materials	Class Certification
5/27/2021	Travis Close	1.6	\$850	\$1,360	Analyze spreadsheet showing renovations at Brookdale facilities for alterations between 2014-2019	Discovery (Non-Deposition)
5/27/2021	Travis Close	0.4	\$850	\$340	Review and analyze amended draft of joint letter brief with Def's section added re: employee bonus documents	Discovery (Non-Deposition)
5/27/2021	Travis Close	0.8	\$850	\$680	Analyze prior correspondence between parties re: corrective action documents requested	Discovery (Non-Deposition)
5/27/2021	Travis Close	1.1	\$850	\$935	Analyze results for "consolidated" and "unconsolidated" in asset management documents under custodian Christopher Odmark	Discovery (Non-Deposition)
5/28/2021	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of draft class member declarations; com's with RLS re same	Class Certification
5/28/2021	Guy Wallace	0.3	\$1,350	\$405	review and analysis of draft declaration of BBK re DSS citations	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/28/2021	Guy Wallace	0.7	\$1,350	\$945	team ZOOM re preparation for class certification, including MTCs, preparation of class member declarations; access experts and facility evaluations	Class Certification
5/28/2021	Guy Wallace	0.8	\$1,350	\$1,080	prepare for and participate in team meeting re document review and analysis for Rule 30(b)(6) depositions	Discovery (Non-Deposition)
5/28/2021	Guy Wallace	0.9	\$1,350	\$1,215	com's with JRA re successor liability issue re newly constructed or altered facilities; review and analysis of district court decisions re same, including decisions from J. Breyer and J. Walker	Misc. Research
5/28/2021	Guy Wallace	0.4	\$1,350	\$540	review and analysis of discovery Order from MJ Beeler; com's with MTJ re same	Other Motions
5/28/2021	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re strategy for meet and confer call with OC re topic 5 depo; plans for team mtg next week	Case Organization, Planning and Strategy
5/28/2021	Mark Johnson	0.8	\$1,150	\$920	calls (x4) w/ GBW re results of meet and confer re topic 5 and plan for ltr brief, other discovery mtns, discovery order from judge Beeler and other issues	Case Organization, Planning and Strategy
5/28/2021	Mark Johnson	0.6	\$1,150	\$690	weekly team meeting re status/strategy/assignments - declaration status, outstanding motions and discovery issues	Case Organization, Planning and Strategy
5/28/2021	Mark Johnson	0.9	\$1,150	\$1,035	telephonic meet and confer w/ OC Vick and Riley re depo on topic 5 and alternative mechanism for resolving potential disputes.	Depositions
5/28/2021	Mark Johnson	0.2	\$1,150	\$230	prep for call w/ OC re topic 5 meet and confer - review prior emails re timing of related communications, review subtopics for topic 5	Depositions
5/28/2021	Mark Johnson	1.5	\$1,150	\$1,725	review and begin revising outline for 30b6 depo topic on ownership issues.	Depositions
5/28/2021	Mark Johnson	0.5	\$1,150	\$575	team meeting re doc review assignments, status, needs for depos, personnel reports	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/28/2021	Rachel Steyer	0.6	\$750	\$450	weekly RBGG and SWCK Brookdale meeting	Case Organization, Planning and Strategy
5/28/2021	Rachel Steyer	0.2	\$750	\$150	incorporating MTJ and GBW edits into draft declaration	Class Certification
5/28/2021	Rachel Steyer	0.2	\$750	\$150	reviewing and incorporating GBW edits to draft declaration	Class Certification
5/28/2021	Rachel Steyer	0.4	\$750	\$300	editing and revising class member declaration before sending to GBW for review	Class Certification
5/28/2021	Rachel Steyer	0.3	\$750	\$225	phone call with class member declarant to review declaration finalizing process, set up time to review	Class Certification
5/28/2021	Rachel Steyer	0.3	\$750	\$225	phone call with class member to discuss declaration finalization process, scheduled call next week	Class Certification
5/28/2021	Rachel Steyer	0.2	\$750	\$150	received call back from declarant, reviewed process of finalizing declaration	Class Certification
5/28/2021	Rachel Steyer	0.8	\$750	\$600	phone call with class member declarant, conducted read through of declaration	Class Certification
5/28/2021	Rachel Steyer	0.6	\$750	\$450	editing and updating draft class member declaration after call with declarant	Class Certification
5/28/2021	Rachel Steyer	0.5	\$750	\$375	editing and revising class member declaration before sending to GBW and MTJ for further review	Class Certification
5/28/2021	Rachel Steyer	0.2	\$750	\$150	phone call with class member to review declaration process	Class Certification
5/28/2021	Travis Close	0.5	\$850	\$425	Analyze renovation spreadsheet for potentially missing (divested) facilities, as pointed out by exper	Case Organization, Planning and Strategy
5/28/2021	Travis Close	0.2	\$850	\$170	email to JM (expert) re: consolidated facilities in renovation spreadsehet	Case Organization, Planning and Strategy
5/28/2021	Travis Close	1.1	\$850	\$935	Weekly doc review meeting w/ SWCK team, RBGG co-counsel, and BMU discussing motions to compel, expert reports, declarations, and class cert strategy	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/28/2021	Travis Close	1.6	\$850	\$1,360	Locate all master renovation spreadsheet and analyze for relevant facilities during class period	Case Organization, Planning and Strategy
5/28/2021	Travis Close	0.4	\$850	\$340	Analyze planned alterations found for Brookdale Folsom facility	Case Organization, Planning and Strategy
5/28/2021	Travis Close	0.4	\$850	\$340	Email to jeff mastin re: definition of 'consolidated' and background on complex ownership of facilities	Case Organization, Planning and Strategy
5/28/2021	Travis Close	0.5	\$850	\$425	Review/revise draft joint letter brief on emergency evacuation & plans of operation	Class Certification
5/28/2021	Travis Close	0.2	\$850	\$170	Review and analyze court's discovery order	Discovery (Non-Deposition)
5/28/2021	Travis Close	0.3	\$850	\$255	Analyze planned alterations found for Brookdale Citrus Heights facility	Discovery (Non-Deposition)
5/29/2021	Guy Wallace	1.1	\$1,350	\$1,485	revise and edit draft class member declarations	Class Certification
5/29/2021	Guy Wallace	0.9	\$1,350	\$1,215	legal research and analysis re successor liability re non-compliant new construction or alterations	Misc. Research
5/30/2021	Guy Wallace	1.2	\$1,350	\$1,620	revise and edit draft class member declarations	Class Certification
5/30/2021	Guy Wallace	1.3	\$1,350	\$1,755	legal research and analysis re CLRA and UCL claims and reliance; materiality; commonality	Class Certification
5/30/2021	Mark Johnson	3.2	\$1,150	\$3,680	work on outline for ownership 30b6 depo; email B Umpierre re same	Depositions
5/31/2021	Guy Wallace	2.7	\$1,350	\$3,645	revise and edit draft class member declarations	Class Certification
5/31/2021	Guy Wallace	0.6	\$1,350	\$810	review and analysis of depo outline for Rule 30(b)(6) depo re own or operate facilities in CA	Depositions
5/31/2021	Mark Johnson	1.0	\$1,150	\$1,150	review emials, notes and prior correspondence and prepare status memo on discovery, motions, meet and confer history	Case Organization, Planning and Strategy
5/31/2021	Mark Johnson	1.5	\$1,150	\$1,725	review prior correspondence and prepare time chart for 30b6 mc history, task time study mc history and timekeeping docs mc history	Case Organization, Planning and Strategy
5/31/2021	Mark Johnson	0.9	\$1,150	\$1,035	review and revise class member declaration and com w/ RLS re same	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/31/2021	Mark Johnson	2.4	\$1,150	\$2,760	revise, add to P section of joint ltr brief re tas time studies ,etc,	Other Motions
5/31/2021	Mark Johnson	2.7	\$1,150	\$3,105	work on draft section of ltr brief for topic 5 30b6 scheduling	Other Motions
5/31/2021	Rachel Steyer	0.2	\$750	\$150	reviewing and incorporating MTJ edits to draft declaration	Class Certification
5/31/2021	Rachel Steyer	0.2	\$750	\$150	editing and revising class member declaration incorporating GBW comments	Class Certification
6/1/2021	Guy Wallace	1.4	\$1,350	\$1,890	revise and edit putative class member declarations; com's with RLS re same	Class Certification
6/1/2021	Guy Wallace	1.6	\$1,350	\$2,160	team meeting re document analysis, class member declaration outreach, expert declarations, deposition preparation, discovery motions including assignments and interim deadlines re same	Class Certification
6/1/2021	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of Brookdale's construction history spreadsheets, including date of construction of facilities and alterations history	Depositions
6/1/2021	Guy Wallace	0.2	\$1,350	\$270	com's with Marks; MTJ re Dr. Flores and class cert declaration	Experts (Including Retention)
6/1/2021	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re meet and confer efforts and MTC's to be filed	Other Motions
6/1/2021	Mark Johnson	1.7	\$1,150	\$1,955	team mtg to discuss strategy, status of class cert projects, discovery, assignments	Case Organization, Planning and Strategy
6/1/2021	Mark Johnson	0.3	\$1,150	\$345	meet and confer w/ Curley, Jacobsen re rog 10 re alterations	Discovery (Non-Deposition)
6/1/2021	Mark Johnson	1.6	\$1,150	\$1,840	work on drafting P section of letter brief on rog 10 re alterations	Other Motions
6/1/2021	Mark Johnson	4.5	\$1,150	\$5,175	work on ltr brief re 30b6 depo, topic 5	Other Motions
6/1/2021	Rachel Steyer	1.5	\$750	\$1,125	meeting with GBW, MTJ, TCC, RAB, LCC to discuss outstanding tasks for class certification	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/1/2021	Rachel Steyer	0.4	\$750	\$300	editing and reviewing draft declaration before sending to GBW and MTJ for review	Class Certification
6/1/2021	Rachel Steyer	0.3	\$750	\$225	editing and revising class declaration before sending to GBW and MTJ for further review	Class Certification
6/1/2021	Rachel Steyer	0.3	\$750	\$225	editing and revising draft declaration before sending to GBW and MTJ for further review	Class Certification
6/1/2021	Rachel Steyer	0.9	\$750	\$675	editing and revising class member declaration before sending to GBW and MTJ for further review, reviewing corresponding documents in esi production	Class Certification
6/1/2021	Rachel Steyer	0.3	\$750	\$225	phone call with class member to review declaration finalizing process, scheduled time to do so	Class Certification
6/1/2021	Rachel Steyer	0.2	\$750	\$150	phone call with class member declarant to review declaration finalizing process, set up follow up phone call	Class Certification
6/1/2021	Rachel Steyer	0.4	\$750	\$300	phone call with class member to discuss aspects of declaration	Class Certification
6/1/2021	Rachel Steyer	0.6	\$750	\$450	editing and revising KDL draft declaration	Class Certification
6/1/2021	Rachel Steyer	0.2	\$750	\$150	editing and incorporating GBW edits into draft declarations	Class Certification
6/1/2021	Rachel Steyer	0.4	\$750	\$300	editing and revising class member declaration before sending to MTJ and GBW for review	Class Certification
6/1/2021	Rachel Steyer	0.2	\$750	\$150	email to TRB with outreach update	Class Outreach and Contact
6/1/2021	Rachel Steyer	0.3	\$750	\$225	received call back from class member declarant, explained declaration finalization process to her and that RBGG will finalize w/her	Class Outreach and Contact
6/1/2021	Travis Close	0.2	\$850	\$170	Email to team re: today's in person meeting at office	Case Organization, Planning and Strategy
6/1/2021	Travis Close	1.3	\$850	\$1,105	Analyze/reformat 3 year renovation chart (excerpt from BKD2652169) showing alterations at all West facilities	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/1/2021	Travis Close	0.3	\$850	\$255	Review/analyze draft declaration of class member Mike Weaver	Class Certification
6/1/2021	Travis Close	1.7	\$850	\$1,445	Team meeting w/ GBW, MTJ, RLS, RAB, LEC re: priotization of class certification topics	Class Certification
6/2/2021	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of revisions to draft class member declarations; preparation of further memo re guidelines for same	Class Certification
6/2/2021	Guy Wallace	2.9	\$1,350	\$3,915	review and analysis of building department file from Hemet; com's with Waters; MTJ; RAB re preparation of construction history based on building department files (1.1)	Discovery (Non-Deposition)
6/2/2021	Guy Wallace	0.5	\$1,350	\$675	com's with GG; KAS; MTJ re settlement	Settlement
6/2/2021	Mark Johnson	0.4	\$1,150	\$460	calls w/ GBW (x3) re settlement inquires raised by Stebner, discovery motion issues, responses to Maatman proposals	Case Organization, Planning and Strategy
6/2/2021	Mark Johnson	0.7	\$1,150	\$805	call w/ BU to discuss depo strategy on topic 3 re ownership of facilities.	Depositions
6/2/2021	Mark Johnson	0.3	\$1,150	\$345	review depo demonstrative from OC - detailed chart of ownership / management / lease of faiclities.	Depositions
6/2/2021	Mark Johnson	0.6	\$1,150	\$690	follow up call w/ BU re topic 3 30b6 depo after review of chart from OC re strategy for exam re same	Depositions
6/2/2021	Mark Johnson	0.5	\$1,150	\$575	call w/ GBW re strategy for completing review of construction history documents for expert reports	Experts (Including Retention)
6/2/2021	Mark Johnson	0.6	\$1,150	\$690	follow up call w/ RAB and then w/ GBW re docs produced pursuant to subpoenas to city's and plan for identifying and tracking construction histories from same.	Experts (Including Retention)
6/2/2021	Mark Johnson	3.8	\$1,150	\$4,370	work on ltr brief re alterations to facilities	Other Motions
6/2/2021	Rachel Steyer	1.4	\$750	\$1,050	phone call with class member declarant to conduct final read through of declaration and finalize	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/2/2021	Rachel Steyer	0.3	\$750	\$225	phone call with KAJ to discuss and review questions about draft declaration	Class Certification
6/2/2021	Rachel Steyer	0.5	\$750	\$375	editing and revising KAJ draft declaration	Class Certification
6/2/2021	Rachel Steyer	0.2	\$750	\$150	phone call with class member declarant, reviewing finalization process, setting up call	Class Certification
6/2/2021	Rachel Steyer	0.6	\$750	\$450	conducted final read through call with declarant	Class Certification
6/2/2021	Rachel Steyer	0.5	\$750	\$375	editing and revising KDL draft class member declaration	Class Certification
6/2/2021	Rachel Steyer	0.2	\$750	\$150	email to co-counsel at RBGG and GBW, TCC, MTJ re potential declarants	Class Outreach and Contact
6/2/2021	Rachel Steyer	0.2	\$750	\$150	email to GBW and MTJ with question re intake and drafting potential class member declaration	Class Outreach and Contact
6/2/2021	Travis Close	0.9	\$850	\$765	Research whether additional asset management spreadsheets/databases appear in emails from Christopher Galante	Case Organization, Planning and Strategy
6/2/2021	Travis Close	0.4	\$850	\$340	Review/analyze draft dec of Ann Mauro for potential concerns re: dementia	Class Certification
6/2/2021	Travis Close	0.3	\$850	\$255	Review email correspondence from team & co-counsel centered around concerns of class member declarants Mauro and Anna Baum	Class Certification
6/2/2021	Travis Close	0.4	\$850	\$340	Verify language of building records subpoenas & whether it could be interpreted to be limited in scope to documents after Jan 26, '92	Discovery (Non-Deposition)
6/2/2021	Travis Close	0.3	\$850	\$255	Email to GBW, MTJ re: whether building records subpoenas arguably contained language limiting scope of request to docs after Jan 26 '92	Discovery (Non-Deposition)
6/2/2021	Travis Close	1.3	\$850	\$1,105	Research duties/activities of Christopher Galante, connected to custodian Christopher Odmark (asset management), re: building maintenance and upkeep	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/2/2021	Travis Close	0.7	\$850	\$595	Review/analyze examples of Unit Turn Over (UTO) reports and which types of info (e.g. alterations and capital improvements) can be gleaned from them	Discovery (Non-Deposition)
6/2/2021	Travis Close	0.7	\$850	\$595	Search for term E-Pro (possible maintenance program) in docs produced under custodian Christopher Odmark	Discovery (Non-Deposition)
6/2/2021	Travis Close	0.4	\$850	\$340	Review and analyze Brookdale's 2020 10-k (Annual Report) to determine number of mentions of "Operating" and "Operate"	Discovery (Non-Deposition)
6/3/2021	Guy Wallace	1.3	\$1,350	\$1,755	further review of revised class member declarations; preparation of revised notes for team re editing same and com's with co-counsel re same	Class Certification
6/3/2021	Guy Wallace	1.8	\$1,350	\$2,430	analysis of D's "licensee" chart produced on June 2, 2021 and Bowman testimony re same; com's with BU; MTJ; TCC re same and legal and factual counterarguments re same	Depositions
6/3/2021	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of Hemet building department file re Hemet Sunwest; com's with Waters re same (.3)	Discovery (Non-Deposition)
6/3/2021	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ; CC re analysis of D's construction history documents; review and analysis of report re San Juan Capistrano facility, constructed in 1998	Discovery (Non-Deposition)
6/3/2021	Guy Wallace	1.3	\$1,350	\$1,755	com's with Marks; Thornton; MTJ re data from Brookdale reports and MTC re same; preparation of draft declaration of Dr. Flores	Experts (Including Retention)
6/3/2021	Guy Wallace	0.6	\$1,350	\$810	com's with GG; KAS; MTJ re settlement and D's request for further mediation	Settlement
6/3/2021	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW re facility construction history, strategy for investigating same	Case Management Conferences

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/3/2021	Mark Johnson	0.5	\$1,150	\$575	call w/ GBW re agendas for document reviewer mtg and team strategy meeting, and re ramifications of Bowman's non-ownerwhip testimony	Case Organization, Planning and Strategy
6/3/2021	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW re open discovery issues for class cert, motions, strategy for addressing new non-ownership claims, construction history issues	Class Certification
6/3/2021	Mark Johnson	0.1	\$1,150	\$115	calls w/ Umpierre and Maatman, and email to Maatman re power outage during depo	Depositions
6/3/2021	Mark Johnson	0.3	\$1,150	\$345	call w/ B Umpierre re ownership tesitmony	Depositions
6/3/2021	Mark Johnson	0.5	\$1,150	\$575	call w/ TCC, B Umpierre and GBW re Bowman depo on topic 3 re ownership and ramification same, strategy for addressing	Depositions
6/3/2021	Mark Johnson	2.4	\$1,150	\$2,760	further review and sorting of structured labor detail reports and comparison to individual labor detail reports for same facility / dates	Discovery (Non-Deposition)
6/3/2021	Mark Johnson	0.3	\$1,150	\$345	review and draft response to OC GLM re production of training related documents and draft ltr brief	Discovery (Non-Deposition)
6/3/2021	Mark Johnson	0.4	\$1,150	\$460	draft email memo to Marks, Thornton re findings on analysis of structured labor detail report and recommendations.	Discovery (Non-Deposition)
6/3/2021	Mark Johnson	0.3	\$1,150	\$345	re-read 5/28 discovery order and underlying brief for disposition of mtn re job descriptions, bonus plans and performance reviews; com w/ GBW re same	Discovery (Non-Deposition)
6/3/2021	Mark Johnson	0.3	\$1,150	\$345	revise chart re status of pending discovery/motion items; review emails for same and com w/ CoC re same	Discovery (Non-Deposition)
6/3/2021	Mark Johnson	1.2	\$1,150	\$1,380	shared screen video conference w/ GBW, Thornton, Marks re Flores declaration scope and timing, structured labor detail reports, other reports.	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/3/2021	Mark Johnson	0.4	\$1,150	\$460	review, finalize and send with cover email draft ltr brief re rog 10 re alterations.	Other Motions
6/3/2021	Mark Johnson	0.4	\$1,150	\$460	call w/ Stebner, Grunfeld, Wallace re response to settlement overture	Settlement
6/3/2021	Rachel Steyer	0.7	\$750	\$525	zoom meeting with class member to review and finalize declaration	Class Certification
6/3/2021	Rachel Steyer	0.2	\$750	\$150	editing draft declaration following call with class member, added in additional info	Class Certification
6/3/2021	Rachel Steyer	0.5	\$750	\$375	phone call with RVR to discuss how outreach is going, updated procedures	Class Outreach and Contact
6/3/2021	Rachel Steyer	0.2	\$750	\$150	outreach call w/class member, set up intake call	Class Outreach and Contact
6/3/2021	Rachel Steyer	0.2	\$750	\$150	outreach call with class member, determined not a good fit for intake/declaration based on brevity of stay	Class Outreach and Contact
6/3/2021	Rachel Steyer	0.4	\$750	\$300	reviewing RVR initial class member intakes for potential declarants, providing comments and feedback to RVR on areas of improvement and further questioning	Class Outreach and Contact
6/3/2021	Rachel Steyer	0.2	\$750	\$150	email to RVR after reviewing intake, feedback	Class Outreach and Contact
6/3/2021	Travis Close	0.6	\$850	\$510	Call with MTJ, GBW, BMU following depo of Kevin Bowman re: next steps in strategies for proving facility ownership and operation by Brookdale	Case Organization, Planning and Strategy
6/3/2021	Travis Close	0.3	\$850	\$255	Review/analyze Emeritus-Brookdale merger agreement for info re: ownership and operation status	Case Organization, Planning and Strategy
6/3/2021	Travis Close	0.3	\$850	\$255	Review and analyze GBW's amended analysis on necessary edits for class member declarations	Case Organization, Planning and Strategy
6/3/2021	Travis Close	0.5	\$850	\$425	Email to GBW, MTJ, BMU re: analysis of Civil Rights Education and Enforcement Center v. Hospitality Properties Trust and implications for establishing commonality at class cert	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/3/2021	Travis Close	0.4	\$850	\$340	Review/analyze Civil Rights Education and Enforcement Center v. Hospitality Properties Trust case decision shared by GBW re: REITs and commonality	Class Certification
6/3/2021	Travis Close	1.2	\$850	\$1,020	Review and analyze prior Brookdale SEC filings for info re: operation of facilities (after testimony from Kevin Bowman that Brookdale does not operate them)	Class Certification
6/3/2021	Travis Close	1.3	\$850	\$1,105	Caselow research on status of operators of REITs and who is responsibility for liability under federal laws	Class Certification
6/3/2021	Travis Close	0.5	\$850	\$425	Analyze examples of Management and Operating Agreements from DSS production, including between REITs and Brookdale subsidiaries, for info re: who is operating facilities	Class Certification
6/3/2021	Travis Close	0.2	\$850	\$170	Email to BMU re: Brookdale's 2014 merger agreement with Emeritus	Depositions
6/3/2021	Travis Close	0.5	\$850	\$425	Review/analyze Brookdale's 2020 10-k for info re: operation of facilities; REIT ownership and co-ventures	Discovery (Non-Deposition)
6/4/2021	Guy Wallace	0.5	\$1,350	\$675	com's with co-counsel re putative class member declarations; material needed by Dr. Flores for review of CDSS citations; owner/operator/manager issue and testimony re same; motions to compel; status of staffing analysis	Class Certification
6/4/2021	Guy Wallace	0.7	\$1,350	\$945	analysis of discovery tasks and preparation of further searches re ADA issues; com's with MTJ; TCC; RAB; CC; EPO re same	Discovery (Non-Deposition)
6/4/2021	Guy Wallace	0.6	\$1,350	\$810	com's with document review team re further searches; review and analysis of building department files re same	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/4/2021	Rachel Steyer	0.6	\$750	\$450	weekly meeting to review strategy and tasks with Brookdale team and cocounsel	Case Organization, Planning and Strategy
6/4/2021	Rachel Steyer	0.3	\$750	\$225	editing and revising class member declaration and updating based on additional documents received from class member	Class Certification
6/4/2021	Rachel Steyer	0.3	\$750	\$225	making final edits to draft declaration to send to GBW and MTJ for review	Class Certification
6/4/2021	Rachel Steyer	0.3	\$750	\$225	editing and revising class member declaration before reviewing and finalizing with declarant	Class Certification
6/4/2021	Rachel Steyer	0.3	\$750	\$225	editing and revising class member declaration before sending to GBW and MTJ for further review	Class Certification
6/4/2021	Rachel Steyer	0.3	\$750	\$225	editing and revising class member declaration before sending to GBW and MTJ for further review	Class Certification
6/4/2021	Rachel Steyer	0.3	\$750	\$225	phone call with declarant to review finalization process, scheduled call to review declaration	Class Certification
6/4/2021	Rachel Steyer	0.4	\$750	\$300	editing and revising KDL draft declaration	Class Certification
6/4/2021	Rachel Steyer	0.2	\$750	\$150	final editing and revisions to KDL draft declaration before sending to GBW and MTJ for final review	Class Certification
6/4/2021	Rachel Steyer	0.4	\$750	\$300	editing and revising class member declaration before sending to GBW and MTJ for final review	Class Certification
6/4/2021	Rachel Steyer	0.2	\$750	\$150	incorporating updated GBW and MTJ edits into draft declaration	Class Certification
6/4/2021	Rachel Steyer	0.4	\$750	\$300	editing and reviewing KDL draft declaration	Class Certification
6/4/2021	Rachel Steyer	0.5	\$750	\$375	phone call with declarant to finalize revisions to declaration before sending for signature	Class Certification
6/4/2021	Rachel Steyer	0.3	\$750	\$225	email to GBW and MTJ with question about possible declarants	Class Outreach and Contact
6/4/2021	Rachel Steyer	1.4	\$750	\$1,050	reviewing prior intakes and residency agreements to determine whether to draft declarations	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/4/2021	Rachel Steyer	0.4	\$750	\$300	reviewing documents (residency agreement, PSPs) for likely declarant	Discovery (Non-Deposition)
6/4/2021	Travis Close	1.2	\$850	\$1,020	Weekly doc review & co-counsel meetings re: revised class cert strategy; doc review projects	Case Organization, Planning and Strategy
6/4/2021	Travis Close	0.5	\$850	\$425	Review and analyze assessment audits shared by opposing counsel re: missing assessment data and move in/move out data	Case Organization, Planning and Strategy
6/4/2021	Travis Close	0.4	\$850	\$340	Analyze 2020/2019 10-K filings (Annual Report) for instances of "Operations" and "Operate"	Case Organization, Planning and Strategy
6/4/2021	Travis Close	0.6	\$850	\$510	Analyze docs produced by City of Citrus Heights for records related to facility at 7375 Stock Ranch Rd; upload and share with experts	Case Organization, Planning and Strategy
6/4/2021	Travis Close	1.2	\$850	\$1,020	Analyze production from Citrus Heights (containing blueprints from 2 facilities nearby on Stock Ranch Rd) to determine, for experts, which blueprints are associated with 7375 Stock Ranch Rd	Case Organization, Planning and Strategy
6/4/2021	Travis Close	0.5	\$850	\$425	Analyze, locate blueprints for 7375 Stock Ranch Rd in City of Citrus Heights production	Case Organization, Planning and Strategy
6/4/2021	Travis Close	0.2	\$850	\$170	Email to GW (expert) re: blueprints and building permits from 7375 Stock Ranch Rd extracted and shared from City production	Case Organization, Planning and Strategy
6/4/2021	Travis Close	0.4	\$850	\$340	Analyze architectural/building differences between 7418 and 7375 Stock Ranch Rd facilities	Class Certification
6/4/2021	Travis Close	0.5	\$850	\$425	Review and analyze spreadsheet by JMP showing types of documents included in each DSS facility production/file: EDs, Residency Agreements, Management/Operating Agreements	Discovery (Non-Deposition)
6/4/2021	Travis Close	0.2	\$850	\$170	Review and analyze draft letter brief from MTJ re: Def's supplemental production of training-related documents	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/4/2021	Travis Close	0.2	\$850	\$170	Email to JMP re: spreadsheet showing management agreements & operation agreements of facilities from DSS production	Discovery (Non-Deposition)
6/4/2021	Travis Close	0.2	\$850	\$170	Email to GBW re: facility ownership memo drafted last year	Discovery (Non-Deposition)
6/5/2021	Guy Wallace	1.6	\$1,350	\$2,160	legal research and analysis re case law re Title III coverage and owns, operates or manages a facility	Misc. Research
6/6/2021	Mark Johnson	1.7	\$1,150	\$1,955	review and analyze transcript of 30b6 deposition (Bowman) re ownership	Depositions
6/7/2021	Guy Wallace	0.5	\$1,350	\$675	com's with JY; AX; MTJ re preparation for Rule 30(b)(6) depositions	Depositions
6/7/2021	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW re pending discovery action items, 30b6 depo re ownership, task time studies document production	Case Organization, Planning and Strategy
6/7/2021	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW re issues for 30b6 depo re budgets, analysis of task time study docs, depo re Kronos data	Case Organization, Planning and Strategy
6/7/2021	Mark Johnson	0.2	\$1,150	\$230	internet research re Brookdale employees Services Corp.	Class Certification
6/7/2021	Mark Johnson	3.5	\$1,150	\$4,025	review and edit/comment on depo outline for budget topic of 30(b)(6) depo; review and analyze potential exhibits for same	Depositions
6/7/2021	Mark Johnson	0.4	\$1,150	\$460	draft e-mail to Ax with suggestions for 30b6 depo on budget issues	Depositions
6/7/2021	Mark Johnson	0.1	\$1,150	\$115	draft email to OC re depo on 6/18/21 re Kronos data	Depositions
6/7/2021	Mark Johnson	0.2	\$1,150	\$230	review and draft response to J Yellin re strategy and options in response to D email concerning Bowman depo	Depositions
6/7/2021	Mark Johnson	0.9	\$1,150	\$1,035	coms w Marks and Thornton re Kronos data depo, assessment data and move-outdata discrepancies and missing data and labor detail reports	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/7/2021	Mark Johnson	1.5	\$1,150	\$1,725	review recently spreadsheets and tiffs re task time studies.	Discovery (Non-Deposition)
6/7/2021	Rachel Steyer	0.2	\$750	\$150	phone call with declarant to discuss finalizing declaration	Class Certification
6/7/2021	Rachel Steyer	0.4	\$750	\$300	editing KDL draft declaration	Class Certification
6/7/2021	Rachel Steyer	0.4	\$750	\$300	editing KDL draft declaration	Class Certification
6/7/2021	Rachel Steyer	0.3	\$750	\$225	editing KDL draft declaration	Class Certification
6/7/2021	Rachel Steyer	0.4	\$750	\$300	editing KDL draft declaration	Class Certification
6/7/2021	Rachel Steyer	0.3	\$750	\$225	editing KDL draft declaration	Class Certification
6/7/2021	Rachel Steyer	0.4	\$750	\$300	editing KDL draft declaration	Class Certification
6/7/2021	Rachel Steyer	0.4	\$750	\$300	editing KDL draft declarations	Class Certification
6/7/2021	Rachel Steyer	0.3	\$750	\$225	editing KDL draft declaration	Class Certification
6/7/2021	Rachel Steyer	0.4	\$750	\$300	editing KDL draft declaration	Class Certification
6/7/2021	Rachel Steyer	0.6	\$750	\$450	editing KAJ draft declaration	Class Certification
6/7/2021	Rachel Steyer	0.8	\$750	\$600	completing draft declaration, highlighting areas for follow up review with declarant	Class Certification
6/7/2021	Rachel Steyer	0.7	\$750	\$525	reviewing co-counsel depo prep outline, added in comments	Depositions
6/7/2021	Travis Close	1.3	\$850	\$1,105	Create spreadsheet for tracking facility record completion & blueprint sending to experts	Case Organization, Planning and Strategy
6/7/2021	Travis Close	0.6	\$850	\$510	Review and analyze status of Carmel Valley facility (DSS, out databases, emails from BKD production)	Case Organization, Planning and Strategy
6/7/2021	Travis Close	0.5	\$850	\$425	Modify master spreadsheet for info re: divestment of Carmel Valley facility; investigation into new management	Case Organization, Planning and Strategy
6/7/2021	Travis Close	0.9	\$850	\$765	Analyze table from BKD's production re topic 3 (ownership) for recently divested facilities	Case Organization, Planning and Strategy
6/7/2021	Travis Close	0.6	\$850	\$510	Investigation into ownership/management change for Rancho Mirage facility	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/7/2021	Travis Close	0.3	\$850	\$255	Modify master facility spreadsheet to add new management info for Rancho Mirage facility	Case Organization, Planning and Strategy
6/7/2021	Travis Close	0.3	\$850	\$255	Modify master facility spreadsheet to add new management info for Salinas facility	Case Organization, Planning and Strategy
6/7/2021	Travis Close	0.4	\$850	\$340	Investigation into ownership/management change for Salinas facility	Case Organization, Planning and Strategy
6/7/2021	Travis Close	0.5	\$850	\$425	Investigation into ownership/management change for San Juan Capistrano facility (review DSS filings, our spreadsheets and recent emails produced by Defs)	Case Organization, Planning and Strategy
6/7/2021	Travis Close	0.2	\$850	\$170	Modify master facility spreadsheet to add new management/ownership info for San Juan Capistrano facility	Case Organization, Planning and Strategy
6/7/2021	Travis Close	0.3	\$850	\$255	Email to RLS re: updated master facility spreadsheet with list of divested facilities	Case Organization, Planning and Strategy
6/7/2021	Travis Close	0.3	\$850	\$255	Investigation into ownership/management change for Elk Grove facility	Case Organization, Planning and Strategy
6/7/2021	Travis Close	0.4	\$850	\$340	Investigation into ownership/management change for Carlsbad facility	Case Organization, Planning and Strategy
6/7/2021	Travis Close	0.2	\$850	\$170	Modify master facility spreadsheet to add new management info for Carlsbad facility	Case Organization, Planning and Strategy
6/7/2021	Travis Close	0.6	\$850	\$510	Review and analyze past correspondence to determine whether citrus heights inspection took place; and if so, when	Depositions
6/7/2021	Travis Close	0.7	\$850	\$595	Review and analyze rough transcript of Kevin Bowman depo (re: topic of ownership) for testimony re: operation/management of facilities	Depositions
6/8/2021	Guy Wallace	0.5	\$1,350	\$675	com's with AX re preparation for Rule 30(b)(6) depo re budgets and related issues	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/8/2021	Guy Wallace	0.8	\$1,350	\$1,080	com's with RLS and review and analysis of Brookdale documents re budget process and corporate control and monitoring of same	Depositions
6/8/2021	Guy Wallace	0.7	\$1,350	\$945	com's with AX; JY; BBK; MTJ re preparation for Rule 30(b)(6) depo re budget topics and preparation of approach to witness, questions and potential obstruction strategies of witness and/or Defendants' counsel	Depositions
6/8/2021	Guy Wallace	0.6	\$1,350	\$810	review and analysis of draft MTC re topic 5 of Rule 30(b)(6) notice; revise and edit same	Other Motions
6/8/2021	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW re outline for budget depo and strategy re same	Depositions
6/8/2021	Mark Johnson	1.8	\$1,150	\$2,070	review various docs identified as potential exhibits for budget depo; research relativity for additional docs and final version of identified email; coms w/ coc re same	Depositions
6/8/2021	Mark Johnson	0.8	\$1,150	\$920	meet and confer session w/ OC Curly and Kristoff and AX re pendant data, training docs and training depo	Discovery (Non-Deposition)
6/8/2021	Mark Johnson	0.6	\$1,150	\$690	coms (x4) w/ GBW re status of outstanding discovery issues, meet and confer w/ OC training materials and pendent data, data reports and underlying data.	Discovery (Non-Deposition)
6/8/2021	Mark Johnson	0.2	\$1,150	\$230	review and respond to COC AX re pendant data issue to be addressed in meet and confer	Discovery (Non-Deposition)
6/8/2021	Mark Johnson	0.8	\$1,150	\$920	draft correspondence to OC re various data reports and underlying data, responding to 6/1 correspondence re same; review notes from call with Marks and Thornton and individual and aggregated data for preparing response.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/8/2021	Mark Johnson	0.1	\$1,150	\$115	follow up email to OC re position on employee related docs (from may 27 letter) and availability to meet and confer	Discovery (Non-Deposition)
6/8/2021	Mark Johnson	0.1	\$1,150	\$115	email to OC re further production of task time study data	Discovery (Non-Deposition)
6/8/2021	Mark Johnson	0.3	\$1,150	\$345	draft follow-up correspondence responding to 6/1 email re missing data from assessment and move out data sets.	Discovery (Non-Deposition)
6/8/2021	Rachel Steyer	0.5	\$750	\$375	phone call with class member declarant to review outstanding questions re his declaration	Class Certification
6/8/2021	Rachel Steyer	1.3	\$750	\$975	editing and finishing draft declaration	Class Certification
6/8/2021	Rachel Steyer	1.7	\$750	\$1,275	editing and drafting class member declaration	Class Certification
6/8/2021	Rachel Steyer	0.2	\$750	\$150	phone call with GBW to discuss budget documents in preparation for 30b6 depo	Depositions
6/8/2021	Rachel Steyer	2.8	\$750	\$2,100	document review to locate relevant budget docs for 306b budget depo	Depositions
6/8/2021	Travis Close	0.2	\$850	\$170	Review and analyze Draft Qs re pendant data for today's meet and confer call	Case Organization, Planning and Strategy
6/8/2021	Travis Close	0.2	\$850	\$170	Email to GBW, BBK sharing charts used by Cal DSS licensing analysts providing common regs for citing Brookdale facilities	Case Organization, Planning and Strategy
6/8/2021	Travis Close	0.7	\$850	\$595	Analyze production by City of Carlsbad to organize/extract facility Blueprints	Case Organization, Planning and Strategy
6/8/2021	Travis Close	0.6	\$850	\$510	Analyze production by City of Carlsbad to organize/extract building permits & correspondence	Case Organization, Planning and Strategy
6/8/2021	Travis Close	0.5	\$850	\$425	Analyze production by City of Citrus Heights to organize/extract facility Blueprints	Case Organization, Planning and Strategy
6/8/2021	Travis Close	0.7	\$850	\$595	Analyze production by City of Citrus Heights to organize/extract building records and correspondence for reference in experts' reports	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/8/2021	Travis Close	0.6	\$850	\$510	Analyze production by City of Brentwood (Cortona Park) to organize/extract blueprints for reference in experts' reports	Case Organization, Planning and Strategy
6/8/2021	Travis Close	0.6	\$850	\$510	Analyze production by City of Brentwood (Cortona Park) to organize/extract building permits & correspondence for reference in experts' reports	Case Organization, Planning and Strategy
6/8/2021	Travis Close	0.5	\$850	\$425	Analyze production by City of Danville (Diablo Lodge facility) to organize/extract blueprints for reference in experts' reports	Case Organization, Planning and Strategy
6/8/2021	Travis Close	0.7	\$850	\$595	Analyze production by City of Danville (Diablo Lodge facility) to organize/extract building permits & correspondence for reference in experts' reports	Case Organization, Planning and Strategy
6/8/2021	Travis Close	0.6	\$850	\$510	Edits to inspected facility record completion spreadsheet (references for expert reports)	Case Organization, Planning and Strategy
6/8/2021	Travis Close	0.7	\$850	\$595	Legal research on Statues/regs on requirements for pendant call system at facilities & accessibility of data	Class Certification
6/8/2021	Travis Close	0.8	\$850	\$680	Attend M/C call with AXU, MTJ, and opposing counsel re: deficient production of training materials and pendant data	Discovery (Non-Deposition)
6/9/2021	Guy Wallace	0.6	\$1,350	\$810	com's with CC re Brookdale documents re ADA compliance, including training documents re reasonable accommodations for ee's and BEST standards that do not reference ADA	Depositions
6/9/2021	Guy Wallace	0.6	\$1,350	\$810	com's with RLS; CC; JMP re transportation policies and procedures and preparation of documents re same for review by Cross	Experts (Including Retention)
6/9/2021	Guy Wallace	1.1	\$1,350	\$1,485	revise and edit draft letter brief re MTC re topic 5 of Rule 30(b)(6) notice	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/9/2021	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of D's opposition to P's motion to compel re altered facilities; legal research and analysis re same; com's with MTJ re same	Other Motions
6/9/2021	Guy Wallace	0.7	\$1,350	\$945	further revisions to draft letter re Rule 30(b)(6) depo re topic 5; com's with MTJ re same	Other Motions
6/9/2021	Mark Johnson	1.5	\$1,150	\$1,725	review spreadsheet of CDSS production of management agreements and samples of agreements themselves.	Class Certification
6/9/2021	Mark Johnson	0.4	\$1,150	\$460	research connection btwn some management companies and Brookdale	Class Certification
6/9/2021	Mark Johnson	1.8	\$1,150	\$2,070	review and revise draft declaration re residency agreement analysis, review residency agreements for language for declaration, draft email to R. Bonner re next steps	Class Certification
6/9/2021	Mark Johnson	0.4	\$1,150	\$460	call w/ AX and JY during depo break re strategy for remainder of depo on budget process, etc.	Depositions
6/9/2021	Mark Johnson	0.2	\$1,150	\$230	review summaries of 30b6 deposition re budget from AX and JY	Depositions
6/9/2021	Mark Johnson	0.2	\$1,150	\$230	email exchange w/ JP and others re preliminary review of management agreement and connections to Brookdale	Discovery (Non-Deposition)
6/9/2021	Mark Johnson	0.3	\$1,150	\$345	draft email to OC re position on operations plans production and meet and confer times; com w/ GBW re same	Discovery (Non-Deposition)
6/9/2021	Mark Johnson	0.3	\$1,150	\$345	review and comment on GBW revisions to ltr brief re topic 5 of 30b6 depo and alt dispute mechanism	Other Motions
6/9/2021	Mark Johnson	0.1	\$1,150	\$115	email exchange w/ D Marks re PHV	Other Motions
6/9/2021	Mark Johnson	0.1	\$1,150	\$115	email follow up w/ OC re D section of letter brief on supplemental resins to Rog 10 re alterations.	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/9/2021	Mark Johnson	0.3	\$1,150	\$345	coms via email and phone re D section to letter brief re alterations.	Other Motions
6/9/2021	Mark Johnson	1.0	\$1,150	\$1,150	research re discovery of construction history for response to D section of brief on rog 10.	Other Motions
6/9/2021	Rachel Steyer	0.4	\$750	\$300	drafting class memembr declaration	Case Organization, Planning and Strategy
6/9/2021	Rachel Steyer	0.4	\$750	\$300	reviewing intake of likely declarant, searching for residency agreement to determine POA/signee	Class Certification
6/9/2021	Rachel Steyer	0.2	\$750	\$150	email to KAJ re declaration	Class Certification
6/9/2021	Rachel Steyer	0.3	\$750	\$225	editing and revising class member declaration	Class Certification
6/9/2021	Rachel Steyer	0.2	\$750	\$150	email to NCN with forms to review and sign for outreach	Class Outreach and Contact
6/9/2021	Rachel Steyer	0.2	\$750	\$150	email to LEC reviewing MTJ assignment re organizing depo exhibits and transcripts	Depositions
6/9/2021	Rachel Steyer	0.2	\$750	\$150	reviewing communications from co-counsel summarizing 30b6 budget depo	Depositions
6/9/2021	Rachel Steyer	0.2	\$750	\$150	phone call with GBW to discuss transportation documents	Discovery (Non-Deposition)
6/9/2021	Rachel Steyer	2.6	\$750	\$1,950	researching and reviewing for relevant transportation policies and documents to provide to expert	Experts (Including Retention)
6/9/2021	Travis Close	1.2	\$850	\$1,020	Investigate whether BKD 21 Management Co is subsidairy of Brookdale in SEC filings and our document productions	Class Certification
6/9/2021	Travis Close	0.3	\$850	\$255	Review/analyze revised version of draft Dec of Kevin Marquis (JND) iso class cert	Class Certification
6/9/2021	Travis Close	0.3	\$850	\$255	Review and analyze notes from AXU re: today's 30(b)(6) depo with Kevin Bowman	Depositions
6/9/2021	Travis Close	0.7	\$850	\$595	Analyze production by City of Santa Rosa (Fountaingrove facility) to organize/extract blueprints for reference in experts' reports	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/9/2021	Travis Close	0.6	\$850	\$510	Analyze production by City of Santa Rosa (Fountaingrove facility) to organize/extract permits & correspondence for reference in experts' reports	Experts (Including Retention)
6/9/2021	Travis Close	0.6	\$850	\$510	Analyze production by City of Santa Rosa (Chanate facility) to organize/extract blueprints for reference in experts' reports	Experts (Including Retention)
6/9/2021	Travis Close	0.5	\$850	\$425	Analyze production by City of Santa Rosa (Chanate facility) to organize/extract permits & correspondence for reference in experts' reports	Experts (Including Retention)
6/9/2021	Travis Close	0.6	\$850	\$510	Analyze production by City of San Diego (Carmel Valley facility) to organize/extract blueprints for reference in experts' reports	Experts (Including Retention)
6/9/2021	Travis Close	0.4	\$850	\$340	Analyze production by City of San Diego (Carmel Valley facility) to organize/extract permits & correspondence for reference in experts' reports	Experts (Including Retention)
6/9/2021	Travis Close	0.6	\$850	\$510	Analyze production by City of San Diego (Clairemont facility) to organize/extract blueprints for reference in experts' reports	Experts (Including Retention)
6/9/2021	Travis Close	0.5	\$850	\$425	Analyze production by City of San Diego (Clairemont facility) to organize/extract permits & correspondence for reference in experts' reports	Experts (Including Retention)
6/9/2021	Travis Close	0.4	\$850	\$340	Analyze production by City of Lodi (Lodi facility) to organize/extract blueprints for reference in experts' reports	Experts (Including Retention)
6/9/2021	Travis Close	0.3	\$850	\$255	Analyze production by City of Lodi (Lodi facility) to organize/extract permits & correspondence for reference in experts' reports	Experts (Including Retention)
6/9/2021	Travis Close	0.3	\$850	\$255	Analyze production by City of Lodi (Kettleman Lane facility) to organize/extract blueprints for reference in experts' reports	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/10/2021	Guy Wallace	0.3	\$1,350	\$405	com's with JY; CC re Bowman emails and Rule 30(b)(6) depo re ADA topic	Depositions
6/10/2021	Guy Wallace	0.5	\$1,350	\$675	com's with JRA; MTJ re successor-in-interest liability for new construction and alterations that do not comply with ADA access standards	Misc. Research
6/10/2021	Guy Wallace	1.4	\$1,350	\$1,890	revise and edit draft MTC re D's inadequate interrogatory response re alterations to facilities; com's with MTJ re same	Other Motions
6/10/2021	Mark Johnson	3.0	\$1,150	\$3,450	research informaiton re legal entitiies alleged by Ds to be owenrs/ operators; prepare chart of same; draft email to COC re same and strategy for completing project to show evidence of Brookdale ownership/operation,	Class Certification
6/10/2021	Mark Johnson	5.0	\$1,150	\$5,750	re-write P section of ltr brief on rog 10 re alterations; research re same, discuss w/ GBW, incropate comments/edts from GBW, finalize and conform redline copy and send to OC w/ cover email	Other Motions
6/10/2021	Travis Close	0.3	\$850	\$255	Email to GBW re: judge beeler's order on 30(b)(6) deposes; joint letter brief and exhibits re: same	Case Organization, Planning and Strategy
6/10/2021	Travis Close	0.3	\$850	\$255	Review/analyze revised version of draft letter brief re: ROG number 10 (on facility alterations)	Class Certification
6/10/2021	Travis Close	1.1	\$850	\$935	Legal research re: LA Ordinance 91.106.4.2.2.2 on release of blueprint records without owner's consent; compare to HSC 19851(a)	Discovery (Non-Deposition)
6/10/2021	Travis Close	0.4	\$850	\$340	Email to MTJ, GBW re: LA's objection to sending blueprints in City production from chatsworth, northridge, north and south tarzana facilities	Discovery (Non-Deposition)
6/10/2021	Travis Close	0.5	\$850	\$425	Review/analyze prior correspondance from City of LA and Titan Legal Services re: objections to production of blueprints	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/10/2021	Travis Close	0.3	\$850	\$255	Review/analyze objections from City of Los Angeles to producing blueprints with other BKD facility building records	Discovery (Non-Deposition)
6/10/2021	Travis Close	0.8	\$850	\$680	Analyze production by City of Rancho Mirage (Mirage Inn facility) to organize/extract blueprints for reference in experts' reports	Discovery (Non-Deposition)
6/10/2021	Travis Close	0.7	\$850	\$595	Analyze production by City of Rancho Mirage (Mirage Inn facility) to organize/extract permits & correspondence for reference in experts' reports	Discovery (Non-Deposition)
6/10/2021	Travis Close	0.7	\$850	\$595	Analyze production by City of Rancho Mirage (Rancho Mirage facility) to organize/extract blueprints for reference in experts' reports	Discovery (Non-Deposition)
6/10/2021	Travis Close	0.6	\$850	\$510	Analyze production by City of Rancho Mirage (Rancho Mirage facility) to organize/extract permits & correspondence for reference in experts' reports	Discovery (Non-Deposition)
6/10/2021	Travis Close	0.6	\$850	\$510	Analyze production by City of Fremont (North Fremont facility) to organize/extract permits & correspondence for reference in experts' reports	Discovery (Non-Deposition)
6/10/2021	Travis Close	0.6	\$850	\$510	Analyze production by City of Fremont (North Fremont facility) to organize/extract blueprints for reference in experts' reports	Discovery (Non-Deposition)
6/10/2021	Travis Close	0.6	\$850	\$510	Analyze production by City of Fremont (Fremont facility) to organize/extract blueprints for reference in experts' reports	Discovery (Non-Deposition)
6/10/2021	Travis Close	0.5	\$850	\$425	Analyze production by City of Fremont (Fremont facility) to organize/extract permits & correspondence for reference in experts' reports	Discovery (Non-Deposition)
6/11/2021	Guy Wallace	0.8	\$1,350	\$1,080	com's with team re document and analysis and preparation for motion for class certification and tasks re same	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/11/2021	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re further document analysis and MTC's re D's non-produced categories of documents	Discovery (Non-Deposition)
6/11/2021	Guy Wallace	0.6	\$1,350	\$810	com's with team re further analysis of documents and preparation for Rule 30(b)(6) depositions	Discovery (Non-Deposition)
6/11/2021	Travis Close	1.6	\$850	\$1,360	Weekly doc review & team meetings with MTJ, GBW, RAB, JMP, CAC, and co-counsel discussing efforts to ID facility alterations; blueprints and permits gathered for experts; deposition strategy; and ownership/operation assignment	Case Organization, Planning and Strategy
6/11/2021	Travis Close	0.3	\$850	\$255	Email to EPO re: coordination of analysis of city productions	Case Organization, Planning and Strategy
6/11/2021	Travis Close	0.2	\$850	\$170	Email to MTJ discussing facility ownership complexity & attaching memo	Case Organization, Planning and Strategy
6/11/2021	Travis Close	0.2	\$850	\$170	Email to JY (co-counsel) discussing ownership, operation, and management of facilities	Case Organization, Planning and Strategy
6/11/2021	Travis Close	0.2	\$850	\$170	Email to team re: SEC filings showing subsidiary info for ownership/operation of CA facilities	Case Organization, Planning and Strategy
6/11/2021	Travis Close	0.6	\$850	\$510	Investigate Brookdale subsidiary information from SEC filings	Case Organization, Planning and Strategy
6/11/2021	Travis Close	1.5	\$850	\$1,275	Investigate current status of legal entities associated with Brookdale facilities from Secretary of State website; download and organize Applications and Statements of Information	Case Organization, Planning and Strategy
6/11/2021	Travis Close	1.2	\$850	\$1,020	Investigate Brookdale subsidiary information that is able to be viewed or requested for a fee on State of Delaware's Divison of Corporations	Case Organization, Planning and Strategy
6/11/2021	Travis Close	0.2	\$850	\$170	Email to MTJ re: contact for investigation of subsidiaries/entities of Brookdale facilities	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/11/2021	Travis Close	0.5	\$850	\$425	Review/analyze chart from Asset Management showing ownership, lease, and management status of brookdale facilities	Class Certification
6/11/2021	Travis Close	0.4	\$850	\$340	Review facility ownership memo drafted last year & summarize findings for today's team meeting	Discovery (Non-Deposition)
6/11/2021	Travis Close	0.4	\$850	\$340	Review and analyze updated and verified ROG responses from Defs re: ownership, management, and lease interests of the facilities	Discovery (Non-Deposition)
6/11/2021	Travis Close	0.4	\$850	\$340	Email to MTJ re: initial progress on ownership/operation investigation and attachment of CA SOS filings for sample entity to demonstrate relevance	Discovery (Non-Deposition)
6/13/2021	Mark Johnson	0.4	\$1,150	\$460	emails to OC re training doc and depo, 30b6 topic 5 schedule and disprove resolution process,	Discovery (Non-Deposition)
6/14/2021	Mark Johnson	0.8	\$1,150	\$920	internet research re Brookdale 10k and list of subsidiaries, comparison to list of corporate liicensees; recent facilities divested by Brookdale and DSS info re same	Class Certification
6/14/2021	Mark Johnson	0.1	\$1,150	\$115	email exchanges w/ OC re topic 5 of 30b6 depo and dispute resolution process	Depositions
6/14/2021	Mark Johnson	0.3	\$1,150	\$345	coms w/ OC, K Stilber and D Marks re depo schedulng for topic 16 and training	Depositions
6/14/2021	Mark Johnson	0.4	\$1,150	\$460	pull and send prior meet and confer correspondmence re Kronos data for background for D Marks for depo, drafr email re same and goals of depo	Depositions
6/14/2021	Mark Johnson	2.4	\$1,150	\$2,760	Review TIFFS and natives of 6/13 production of task time related documents.	Discovery (Non-Deposition)
6/14/2021	Mark Johnson	0.5	\$1,150	\$575	call w/ Travis and Jenny re strategy for investigation of corporate liicensees' relationships to Brookdale	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/14/2021	Mark Johnson	0.2	\$1,150	\$230	calls w/ K Stilber re clarification of spreadsheets on personnel reports	Discovery (Non-Deposition)
6/14/2021	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re status of discovery and motions,	Discovery (Non-Deposition)
6/14/2021	Mark Johnson	0.6	\$1,150	\$690	review spreadsheet from K Stilber re production of personnel reports	Discovery (Non-Deposition)
6/14/2021	Mark Johnson	2.7	\$1,150	\$3,105	update discovery chart of status and tasks; research files for same; draft letter to OC re outstanding discovery tasks	Discovery (Non-Deposition)
6/14/2021	Travis Close	1.3	\$850	\$1,105	Lexis/westlaw background searches on Brookdale entities to trace ownership:	Case Organization, Planning and Strategy
6/14/2021	Travis Close	1.5	\$850	\$1,275	Create spreadsheet of managed, leased, & owned CA facilities based on info in BKD2602260	Case Organization, Planning and Strategy
6/14/2021	Travis Close	0.3	\$850	\$255	Email to JY re: sharing materials before call regarding facility ownership assignment	Case Organization, Planning and Strategy
6/14/2021	Travis Close	0.3	\$850	\$255	Email to Team explaining list of facilities recently divested by Brookdale in Californi3	Case Organization, Planning and Strategy
6/14/2021	Travis Close	0.2	\$850	\$170	Email to MTJ re: divestment of Salinas Facility -- not shown on table provided last week for Bowman depo	Case Organization, Planning and Strategy
6/14/2021	Travis Close	0.8	\$850	\$680	Call with JY (co-counsel) and MTJ re: connecting subsidiaries to parent assignment	Case Organization, Planning and Strategy
6/14/2021	Travis Close	0.6	\$850	\$510	Analyze Brookdale's most recent 10-k for references to its relationship with its subsidiaries	Case Organization, Planning and Strategy
6/14/2021	Travis Close	1.5	\$850	\$1,275	Analyze whether legal entity names listed in Ds' amended responses in Carlson ROGs for 91 facilities are also found as subsidiaries in 2020 10-k Ex. 21	Class Certification
6/14/2021	Travis Close	0.3	\$850	\$255	Investigate whether BRE Knight SH Red Bluff LLC is owned/controlled by blackstone real estate	Class Certification
6/14/2021	Travis Close	0.3	\$850	\$255	Review/analyze parties' negotiations correspondence re: 30(b)(6) compromise on further testimony for topic 5	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/15/2021	Guy Wallace	1.6	\$1,350	\$2,160	com's with MTJ re status of discovery; disputes re non-produced materials; potential MTC's re same	Discovery (Non-Deposition)
6/15/2021	Mark Johnson	2.0	\$1,150	\$2,300	mtg w/ GBW re discovery motions to compel, depo prep and other tasks	Class Certification
6/15/2021	Mark Johnson	0.5	\$1,150	\$575	finalize ltr to OC re multiple outstanding dicoverly issues, incorporate GBW edits and send	Discovery (Non-Deposition)
6/15/2021	Rachel Steyer	0.3	\$750	\$225	reviewing intakes/declaration tracking spreadsheet	Case Organization, Planning and Strategy
6/15/2021	Rachel Steyer	0.4	\$750	\$300	meeting with NCN to discuss declaration drafting	Class Certification
6/15/2021	Rachel Steyer	0.4	\$750	\$300	reviewing and preparing final draft declarations to send out via HelloSign to declarants for signature	Class Certification
6/15/2021	Rachel Steyer	0.3	\$750	\$225	reviewing notes from co-counsel w/potential former employee declaration	Class Outreach and Contact
6/15/2021	Rachel Steyer	1.4	\$750	\$1,050	reviewing newer ESI productions for ADA depositions	Discovery (Non-Deposition)
6/15/2021	Travis Close	0.3	\$850	\$255	Email to MTJ re: regulation requiring personnel reports be reported to Cal DSS	Case Organization, Planning and Strategy
6/15/2021	Travis Close	0.2	\$850	\$170	Email to RAB re: updated list of facilities for while city productions are complete	Case Organization, Planning and Strategy
6/15/2021	Travis Close	0.5	\$850	\$425	Edits to spreadsheet created by RAB listing facilities for which we have a complete city production & bates numbers	Case Organization, Planning and Strategy
6/15/2021	Travis Close	0.3	\$850	\$255	Email to team re: analysis of ownership interest in facility legal entity names disclosed in Carlson ROG responses	Case Organization, Planning and Strategy
6/15/2021	Travis Close	0.6	\$850	\$510	Search for Brookdale's legal entity names from remaining facilities in earlier SEC filings (2010-2018)	Case Organization, Planning and Strategy
6/15/2021	Travis Close	1.8	\$850	\$1,530	Analyze RCFE and Community Care Licensing regulations for references to and requirements for personnel reports (LIC 500)	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/15/2021	Travis Close	0.3	\$850	\$255	Meet with MTJ, GBW re: proving ownership for four remaining facilities not listed on SEC Exhibit filings	Class Certification
6/15/2021	Travis Close	0.3	\$850	\$255	Email to team re: suggestions for whether to include pendant data testimony in former employee declaration iso class cert	Class Outreach and Contact
6/15/2021	Travis Close	1.2	\$850	\$1,020	Search for and analyze management agreements between HCP Fortuna Opco LLC and BKD Twenty One Management LLC (Fortuna facility)	Discovery (Non-Deposition)
6/15/2021	Travis Close	1.3	\$850	\$1,105	Search for and analyze management agreements between HCP Clearlake OpCo LLC and BKD Twenty One Management LLC (Clearlake facility)	Discovery (Non-Deposition)
6/15/2021	Travis Close	1.4	\$850	\$1,190	Search for and analyze management agreements between HCP Yreka OpCo LLC and BKD Twenty One Management LLC (Yreka facility)	Discovery (Non-Deposition)
6/16/2021	Guy Wallace	4.4	\$1,350	\$5,940	review and analysis of documents re D's transportation policies and procedures, training materials; com's with RLS; RAB; CC re same (.5)	Discovery (Non-Deposition)
6/16/2021	Rachel Steyer	0.3	\$750	\$225	reviewing and gathering job descriptions for co-counsel in preparation for 30b6 depo topic re payroll info	Depositions
6/16/2021	Rachel Steyer	3.6	\$750	\$2,700	document review/searches for requested payroll data and information in preparation for 30b6 payroll depo topic	Depositions
6/16/2021	Rachel Steyer	3.0	\$750	\$2,250	reviewing ongoing documents for transportation and ADA policies	Depositions
6/16/2021	Travis Close	0.3	\$850	\$255	Reeview and analyze dec of class member Lee Asenian iso Ps' motion for class cert	Case Organization, Planning and Strategy
6/16/2021	Travis Close	0.3	\$850	\$255	Review and analyze hot docs found by JMP re: service alignment	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/16/2021	Travis Close	0.3	\$850	\$255	Review and analyze draft dec of Ray Voorgis iso Ps' motion for class cert (signed)	Class Certification
6/16/2021	Travis Close	0.5	\$850	\$425	Review and analyze testimony re: ownership/operation of facilities from Kevin Bowman depo transcript	Depositions
6/16/2021	Travis Close	0.7	\$850	\$595	Review/analyze recent DSS Facility Evaluation Reports and Complaint Investigation Reports for Citrus Heights facility and Serento Rosa (fka Yorba Linda)	Discovery (Non-Deposition)
6/16/2021	Travis Close	0.6	\$850	\$510	Analyze production by City of Los Angeles (Chatsworth facility) to organize/extract blueprints for reference in experts' reports	Discovery (Non-Deposition)
6/16/2021	Travis Close	0.7	\$850	\$595	Analyze production by City of Los Angeles (Northridge facility) to organize/extract permits & correspondence for reference in experts' reports	Discovery (Non-Deposition)
6/16/2021	Travis Close	0.8	\$850	\$680	Analyze production by City of Los Angeles (North Tarzana facility) to organize/extract permits & correspondence for reference in experts' reports	Discovery (Non-Deposition)
6/16/2021	Travis Close	0.6	\$850	\$510	Analyze production by City of Los Angeles (South Tarzana facility) to organize/extract permits & correspondence for reference in experts' reports	Discovery (Non-Deposition)
6/16/2021	Travis Close	0.5	\$850	\$425	Analyze production by City of Orangevale (Orangevale facility) to organize/extract permits & correspondence for reference in experts' reports	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/16/2021	Travis Close	0.6	\$850	\$510	Analyze production by City of Orangevale (Orangevale facility) to organize/extract blueprints for reference in experts' reports	Discovery (Non-Deposition)
6/16/2021	Travis Close	0.5	\$850	\$425	Analyze production by City of Roseville (Roseville facility) to organize/extract blueprints for reference in experts' reports	Discovery (Non-Deposition)
6/16/2021	Travis Close	0.6	\$850	\$510	Analyze production by City of Roseville (Roseville facility) to organize/extract permits & correspondence for reference in experts' reports	Discovery (Non-Deposition)
6/16/2021	Travis Close	0.4	\$850	\$340	Analyze production by City of San Jose (San Jose facility) to organize/extract permits & correspondence for reference in experts' reports	Discovery (Non-Deposition)
6/16/2021	Travis Close	0.6	\$850	\$510	Analyze production by City of San Jose (San Jose facility) to organize/extract blueprints for reference in experts' reports	Discovery (Non-Deposition)
6/17/2021	Guy Wallace	2.1	\$1,350	\$2,835	revise and edit draft declaration of former Brookdale DDO; com's with JY re same	Class Certification
6/17/2021	Guy Wallace	2.6	\$1,350	\$3,510	preparation of topics. questions and exhibits for ADA depo	Depositions
6/17/2021	Guy Wallace	3.7	\$1,350	\$4,995	review and analysis of transportation and emergency evacuation policies, procedures and training documents; com's with TCC; RLS re same (.7)	Discovery (Non-Deposition)
6/17/2021	Rachel Steyer	0.2	\$750	\$150	phone call with class member declarant to reschedule call to finalize declaration, preparing teams invite	Class Certification
6/17/2021	Rachel Steyer	0.2	\$750	\$150	phone call with declarant about status of case and declaration	Class Certification
6/17/2021	Rachel Steyer	0.3	\$750	\$225	editing and reviewing KAJ class member declaration	Class Certification
6/17/2021	Rachel Steyer	0.6	\$750	\$450	reviewing and editing NCN draft class member declaration	Class Certification
6/17/2021	Rachel Steyer	0.2	\$750	\$150	email to NCN with draft declaration and comments	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/17/2021	Rachel Steyer	0.4	\$750	\$300	phone call with GBW to discuss transportation docs, communications with expert	Discovery (Non-Deposition)
6/17/2021	Rachel Steyer	0.3	\$750	\$225	preparing email to transportation expert, gathering relevant documents identified	Discovery (Non-Deposition)
6/17/2021	Rachel Steyer	0.2	\$750	\$150	preparing email to GBW with additional transportation and emergency docs/policies	Discovery (Non-Deposition)
6/17/2021	Rachel Steyer	1.1	\$750	\$825	reviewing emergency documents looking for relevant ADA policies	Discovery (Non-Deposition)
6/17/2021	Travis Close	0.2	\$850	\$170	Call with GBW re: searching for supplemental emergency evacuation plans for specific facilities	Case Organization, Planning and Strategy
6/17/2021	Travis Close	0.2	\$850	\$170	Email to June Kailes with attached emergency evaucation & disaster materials for review	Case Organization, Planning and Strategy
6/17/2021	Travis Close	0.2	\$850	\$170	Email to JMP re: analysis of emergency evac & disaster planning materials	Case Organization, Planning and Strategy
6/17/2021	Travis Close	0.2	\$850	\$170	Review/analyze notes from BBK re: today's depo of Kevin Bowman on topic 10	Depositions
6/17/2021	Travis Close	1.7	\$850	\$1,445	Review/analyze supplemental emergency evaucation plans for specific facilities (Fountaingrove, Sunwest, Scotts Valley, Corona, Santa Monica, Santa Monica Gardens, South Tarzana) -- and send results to expert for review	Discovery (Non-Deposition)
6/17/2021	Travis Close	1.5	\$850	\$1,275	Review/analyze emergency evacuation training materials & prepare for expert review	Discovery (Non-Deposition)
6/17/2021	Travis Close	0.6	\$850	\$510	Review community feedback surveys for CA facilities for 2016-2017, focusing on comments re: lack of emergency evaucation and accessibility concerns	Discovery (Non-Deposition)
6/17/2021	Travis Close	0.2	\$850	\$170	Call with GBW re: gathering emergency evacuation policies and procedures for expert	Experts (Including Retention)
6/18/2021	Guy Wallace	0.4	\$1,350	\$540	com's with KES; RLS re revisions to draft class member declarations	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/18/2021	Guy Wallace	2.5	\$1,350	\$3,375	preparation of topics and exhibits for ADA depo; com's with TCC; RLS; CC re same	Depositions
6/18/2021	Guy Wallace	0.3	\$1,350	\$405	com's with Kennedy re preparation of damages declaration	Experts (Including Retention)
6/18/2021	Rachel Steyer	0.2	\$750	\$150	phone call with class member declarant, scheduled final read through call	Class Certification
6/18/2021	Rachel Steyer	0.8	\$750	\$600	review of declaration with declarant, making last minute revisions	Class Certification
6/18/2021	Rachel Steyer	0.2	\$750	\$150	call back from class member to discuss making revisions to declaration	Class Certification
6/18/2021	Rachel Steyer	0.2	\$750	\$150	scheduled follow up/declaration final review call with declarant	Class Certification
6/18/2021	Rachel Steyer	0.2	\$750	\$150	phone call w/GBW to discuss construction history documents and safety policy manuals	Discovery (Non-Deposition)
6/18/2021	Rachel Steyer	0.9	\$750	\$675	reviewing 2018 and 2019 safety policy manuals to look for any relevant ADA material	Discovery (Non-Deposition)
6/19/2021	Guy Wallace	3.9	\$1,350	\$5,265	preparation of topics, questions and exhibits for ADA depo	Depositions
6/20/2021	Guy Wallace	4.4	\$1,350	\$5,940	preparation of depo outline and exhibits for ADA depo	Depositions
6/20/2021	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW re pending discovery issues and plan for respoding to OC emails re meeting and conferring	Discovery (Non-Deposition)
6/20/2021	Mark Johnson	0.4	\$1,150	\$460	review emails from GLM re outstanding discovery issues and meeting and conferring; prepare memo re same	Discovery (Non-Deposition)
6/21/2021	Guy Wallace	4.8	\$1,350	\$6,480	preparation of topics, questions and exhibits for ADA depo; com's with RLS; CC re same (.6)	Depositions
6/21/2021	Guy Wallace	3.6	\$1,350	\$4,860	preparation of topics & questions for deposition outline for Rule 30(b)(6) depo re ADA	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/21/2021	Rachel Steyer	0.5	\$750	\$375	editing class member declarant based on feedback/comments from declarant	Class Certification
6/21/2021	Rachel Steyer	1.1	\$750	\$825	editing and revising earlier KAJ draft declaration, reviewing and gathering corresponding class member documents, incorporating info into declaration draft	Class Certification
6/21/2021	Rachel Steyer	0.7	\$750	\$525	editing and revising NCN draft declaration	Class Certification
6/21/2021	Rachel Steyer	0.2	\$750	\$150	email to NCN with comments re draft declaration	Class Certification
6/21/2021	Rachel Steyer	0.3	\$750	\$225	editing KAJ draft declaration	Class Certification
6/21/2021	Rachel Steyer	0.3	\$750	\$225	editing old KAJ draft declaration	Class Certification
6/21/2021	Rachel Steyer	0.5	\$750	\$375	editing and revising old KAJ draft declaration	Class Certification
6/21/2021	Rachel Steyer	0.3	\$750	\$225	responding to co-counsel's email re missing residency agreements	Class Certification
6/21/2021	Rachel Steyer	0.2	\$750	\$150	email to RVR re outreach to declarants	Class Outreach and Contact
6/21/2021	Rachel Steyer	0.6	\$750	\$450	meeting/call with TRB to discuss outreach staffing	Class Outreach and Contact
6/21/2021	Rachel Steyer	0.2	\$750	\$150	email to NCN, RVR, KDL re general outreach, question about intake	Class Outreach and Contact
6/21/2021	Rachel Steyer	1.3	\$750	\$975	reviewing old intakes, identifying partially completed intakes for additional follow up w/class member for potential declaration	Class Outreach and Contact
6/21/2021	Rachel Steyer	0.2	\$750	\$150	email to RVR summarizing tasks and assignments	Class Outreach and Contact
6/21/2021	Rachel Steyer	0.2	\$750	\$150	email to GBW finding info requested in document	Depositions
6/21/2021	Rachel Steyer	0.2	\$750	\$150	preparing email to GBW with documents requested	Discovery (Non-Deposition)
6/21/2021	Travis Close	0.5	\$850	\$425	Final edits to draft joint letter brief re deficient Carlson supplemental ROGs response	Case Organization, Planning and Strategy
6/21/2021	Travis Close	0.3	\$850	\$255	Email to team re: update on evidence of facility ownership from remaining facilities which were not subsidiaries of Brookdale	Case Organization, Planning and Strategy
6/21/2021	Travis Close	0.3	\$850	\$255	Emails to GBW re: Def's responses to ROGs showing new constructed facilities	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/21/2021	Travis Close	0.2	\$850	\$170	Review/analyze joint case management statement filed by parties	Case Organization, Planning and Strategy
6/21/2021	Travis Close	0.9	\$850	\$765	Analyze results for "price per point" (PPP) to determine relationship between acuti and resident pricing	Class Certification
6/21/2021	Travis Close	1.2	\$850	\$1,020	Review/analyze DSS file for Brookdale Fortuna for evidence of third party agreements	Discovery (Non-Deposition)
6/21/2021	Travis Close	0.4	\$850	\$340	Assist LEC in filing joint letter brief	Discovery (Non-Deposition)
6/21/2021	Travis Close	1.4	\$850	\$1,190	Review/analyze results for HCP Fortuna OpCo LLC for evidence of common ownership/management between Brookdale and private equity firm	Discovery (Non-Deposition)
6/21/2021	Travis Close	0.8	\$850	\$680	Review/analyze pendant data in new production from defendants to determine length of wait times	Discovery (Non-Deposition)
6/21/2021	Travis Close	0.5	\$850	\$425	Analyze records of employees in asset management division to determine who is regional director of asset management	Discovery (Non-Deposition)
6/22/2021	Guy Wallace	8.8	\$1,350	\$11,880	preparation of topics; questions; and exhibits for Rule 30(b)(6) depo re ADA; com's with RLS; RAB; CC re same (1.4)	Depositions
6/22/2021	Rachel Steyer	0.9	\$750	\$675	final read through call with class member declarant to review and finalize declaration for signature	Class Certification
6/22/2021	Rachel Steyer	0.2	\$750	\$150	response to co-counsel re declarants and residency agreements	Class Certification
6/22/2021	Rachel Steyer	0.3	\$750	\$225	email response to NCN re follow up about declarations	Class Outreach and Contact
6/22/2021	Rachel Steyer	0.3	\$750	\$225	conducting search for specific documents based on GBW request in preparation for ADA 30b6 depo	Depositions
6/22/2021	Rachel Steyer	0.2	\$750	\$150	email to GBW with questions about potential exhibits in preparation for depo	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/22/2021	Rachel Steyer	0.2	\$750	\$150	phone call with GBW to review documents and exhibits	Depositions
6/22/2021	Rachel Steyer	1.9	\$750	\$1,425	reviewing and analyzing emergency manuals for relevant ADA information in preparation for 30b6 ADA depo	Discovery (Non-Deposition)
6/22/2021	Travis Close	1.5	\$850	\$1,275	Depo prep - review/analyze spreadsheets under custodian Christopher Odmark for historical and planned renovations	Depositions
6/22/2021	Travis Close	0.2	\$850	\$170	Email to GBW re: spreadsheets showing historical and planned renovations/alterations for West region facilities	Depositions
6/22/2021	Travis Close	1.3	\$850	\$1,105	Depo prep - review/analyze spreadsheets under custodian Christopher Odmark for evidence of individual facilities' budgets	Discovery (Non-Deposition)
6/22/2021	Travis Close	1.3	\$850	\$1,105	Analyze production by City of San Juan Capistrano (San Juan Capistrano facility) to organize/extract blueprints for reference in experts' reports	Experts (Including Retention)
6/22/2021	Travis Close	1.1	\$850	\$935	Analyze production by City of San Juan Capistrano (San Juan Capistrano facility) to organize/extract permits & correspondence for reference in experts' reports	Experts (Including Retention)
6/22/2021	Travis Close	0.7	\$850	\$595	Analyze production by City of San Pablo (San Pablo facility) to organize/extract blueprints for reference in experts' reports	Experts (Including Retention)
6/22/2021	Travis Close	0.6	\$850	\$510	Analyze production by City of San Juan Capistrano (San Juan Capistrano facility) to organize/extract permits & correspondence for reference in experts' reports	Experts (Including Retention)
6/23/2021	Guy Wallace	1.1	\$1,350	\$1,485	preparation of topics and questions for Rule 30(b)(6) depo re ADA compliance	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/23/2021	Guy Wallace	7.9	\$1,350	\$10,665	Rule 30(b)(6) depo re D's policies, procedures and practices re ADA compliance	Depositions
6/23/2021	Guy Wallace	0.8	\$1,350	\$1,080	analysis of results of Rule 30(b)(6) depo re ADA policies, procedures and practices; com's with MTJ; RLS re same	Depositions
6/23/2021	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re results of Access 30b6 depo and planning for Sheila Garner depo	Depositions
6/23/2021	Rachel Steyer	6.2	\$750	\$4,650	assisting GBW with deposition exhibits, attending deposition	Depositions
6/23/2021	Rachel Steyer	0.7	\$750	\$525	communications/calls with GBW to discuss documents in between breaks, depo strategy	Depositions
6/23/2021	Rachel Steyer	0.7	\$750	\$525	preparing for depo, reviewing and double checking exhibit list	Depositions
6/24/2021	Guy Wallace	0.9	\$1,350	\$1,215	revise and edit draft class member declarations; com's with JY; RLS re same	Class Certification
6/24/2021	Guy Wallace	0.9	\$1,350	\$1,215	review of potential exhibits and draft outline of topics for Garner depo; com's with MTJ re same	Depositions
6/24/2021	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ re status of discovery; potential issues for further MTCs	Discovery (Non-Deposition)
6/24/2021	Guy Wallace	0.4	\$1,350	\$540	com's with Mastin re preparation of facility reports	Experts (Including Retention)
6/24/2021	Guy Wallace	0.4	\$1,350	\$540	com's with Kennedy and LP re preparation of expert damages model	Experts (Including Retention)
6/24/2021	Rachel Steyer	0.3	\$750	\$225	question to MTJ and GBW re potential declarant and propsoed changes	Class Certification
6/24/2021	Rachel Steyer	0.2	\$750	\$150	phone call with declarant, requested to reschedule/postpone final review call	Class Certification
6/24/2021	Rachel Steyer	0.4	\$750	\$300	editing class member declaration	Class Certification
6/24/2021	Rachel Steyer	0.3	\$750	\$225	editing KDL draft declaration	Class Certification
6/24/2021	Rachel Steyer	0.2	\$750	\$150	reviewing KDL draft declaration	Class Certification
6/24/2021	Rachel Steyer	0.3	\$750	\$225	phone call with declarant, scheduled final review call	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/24/2021	Rachel Steyer	0.4	\$750	\$300	editing and revising draft NCN declaration	Class Certification
6/24/2021	Rachel Steyer	0.2	\$750	\$150	email to NCN with feedback on declaration drafting	Class Certification
6/24/2021	Rachel Steyer	0.5	\$750	\$375	composing email to GBW and MTJ with names of outstanding declarations for review/approval	Class Certification
6/24/2021	Rachel Steyer	0.2	\$750	\$150	editing and revising class member declaration before sending to GBW and MTJ for approval	Class Certification
6/24/2021	Rachel Steyer	0.4	\$750	\$300	editing draft class member declaration for GBW and MTJ final approval	Class Certification
6/24/2021	Rachel Steyer	0.3	\$750	\$225	editing KDL draft declaration	Class Certification
6/24/2021	Rachel Steyer	0.3	\$750	\$225	editing draft class member declaration	Class Certification
6/24/2021	Rachel Steyer	0.2	\$750	\$150	editing class member declaration	Class Certification
6/24/2021	Rachel Steyer	0.2	\$750	\$150	response to co-counsel re outreach	Class Outreach and Contact
6/24/2021	Rachel Steyer	0.3	\$750	\$225	email to RVR with comments on intake	Class Outreach and Contact
6/24/2021	Rachel Steyer	0.3	\$750	\$225	phone call with co-counsel to discuss outreach strategies and troubleshooting sharepoint	Class Outreach and Contact
6/24/2021	Travis Close	1.0	\$850	\$850	Analyze production by City of San Ramon (San Ramon facility) to organize/extract blueprints for reference in experts' reports	Case Organization, Planning and Strategy
6/24/2021	Travis Close	0.9	\$850	\$765	Analyze production by City of San Ramon (San Ramon facility) to organize/extract permits & correspondence for reference in experts' reports	Case Organization, Planning and Strategy
6/24/2021	Travis Close	0.9	\$850	\$765	Analyze production by City of Santa Monica (Santa Monica /Ocean House facility) to organize/extract blueprints for reference in experts' reports	Case Organization, Planning and Strategy
6/24/2021	Travis Close	0.8	\$850	\$680	Analyze production by City of Santa Monica (Santa Monica /Ocean House facility) to organize/extract permits & correspondence for reference in experts' reports	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/24/2021	Travis Close	0.7	\$850	\$595	Analyze production by City of Santa Monica (Santa Monica Gardens facility) to organize/extract blueprints for reference in experts' reports	Case Organization, Planning and Strategy
6/24/2021	Travis Close	0.7	\$850	\$595	Analyze production by City of Santa Monica (Santa Monica Gardens facility) to organize/extract permits & correspondence for reference in experts' reports	Case Organization, Planning and Strategy
6/24/2021	Travis Close	0.5	\$850	\$425	Review & revise draft declaration of Jeanette Algarme iso class certification	Class Certification
6/24/2021	Travis Close	0.5	\$850	\$425	Review and analyze rough draft of yesterday's depo with Kevin Bowman re: ADA policices and procedures	Depositions
6/25/2021	Guy Wallace	0.7	\$1,350	\$945	com's with GG; JY; BBK; AX; MTJ; TCC; RLS; BU re preparation for class certification	Class Certification
6/25/2021	Guy Wallace	1.1	\$1,350	\$1,485	preparation of topics, questions, exhibits for Garner depo; com's with MTJ re same	Depositions
6/25/2021	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ; AX re meet and confer with Defendants on 6/25 and potential motions to compel	Discovery (Non-Deposition)
6/25/2021	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ re document analysis needs and preparation for upcoming Rule 30(b)(6) depositions	Discovery (Non-Deposition)
6/25/2021	Guy Wallace	0.5	\$1,350	\$675	com's with AX; KES; MTJ; TCC; RAB; JMP; EO; Dion; CC re document analysis tasks for class certification	Discovery (Non-Deposition)
6/25/2021	Guy Wallace	0.2	\$1,350	\$270	com's with Waters re draft reports	Experts (Including Retention)
6/25/2021	Mark Johnson	0.8	\$1,150	\$920	call w/ GBW re Garner depo topics, exhibits and prep	Case Organization, Planning and Strategy
6/25/2021	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW re topics for team meeting on document review and strategy	Case Organization, Planning and Strategy
6/25/2021	Mark Johnson	1.3	\$1,150	\$1,495	participate in weekly team mtg on doc review tasks and priorities, deposition recap, strategies on discovery issues and potential motions to compel	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/25/2021	Mark Johnson	0.5	\$1,150	\$575	call w GBW to recap results of meet and confer and strategize on potential motions to compel	Case Organization, Planning and Strategy
6/25/2021	Mark Johnson	0.4	\$1,150	\$460	finalize and send withdrawal of Bowman depo and notice of Rubin depo; draft email cover for latter re failure to meet and confer and motion to compel	Depositions
6/25/2021	Mark Johnson	2.4	\$1,150	\$2,760	review docs for Garner depo and work on outline	Depositions
6/25/2021	Mark Johnson	1.1	\$1,150	\$1,265	meet and confer w/ OC Jacobsen and Riley re outstanding discovery issues per May 5 and June 15 letters.	Discovery (Non-Deposition)
6/25/2021	Rachel Steyer	0.6	\$750	\$450	weekly team meeting to discuss ongoing tasks and assignments for class certification	Case Organization, Planning and Strategy
6/25/2021	Rachel Steyer	0.4	\$750	\$300	reviewing outstanding declarations, which stages of drafting they're in, which ones need to be completed, etc	Case Organization, Planning and Strategy
6/25/2021	Rachel Steyer	0.8	\$750	\$600	reviewing and updating draft declarations, sending to GBW and MTJ for review	Class Certification
6/25/2021	Rachel Steyer	0.3	\$750	\$225	editing and revising class member declaration	Class Certification
6/25/2021	Rachel Steyer	0.2	\$750	\$150	editing and finalizing draft KDL declaration before submitting to GBW and MTJ for approval	Class Certification
6/25/2021	Rachel Steyer	0.3	\$750	\$225	editing and revising declaration for NRD to send for signature	Class Certification
6/25/2021	Rachel Steyer	1.0	\$750	\$750	editing and finalizing remaining KAJ draft declarations before sending to MTJ and GBW for approval	Class Certification
6/25/2021	Rachel Steyer	1.3	\$750	\$975	communications with declarant to review and finalize declaration for signature	Class Certification
6/25/2021	Rachel Steyer	0.3	\$750	\$225	assignments to NCN and NRD re finalizing declarations/tracking down declarants	Class Outreach and Contact
6/25/2021	Rachel Steyer	0.2	\$750	\$150	email to KDL conferring regarding potential declarant	Class Outreach and Contact
6/25/2021	Rachel Steyer	0.2	\$750	\$150	review of email from co-counsel summarizing status of meet and confer with opposing counsel	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/25/2021	Travis Close	1.2	\$850	\$1,020	Doc review meeting & general team meeting re: upcoming depositions, docs to prioritize for document review, expert reports, and info needed for staffing experts	Case Organization, Planning and Strategy
6/25/2021	Travis Close	0.5	\$850	\$425	Analyze discovery requests to determine for which Operations Plans fall under (in advance of M/C with Defs)	Case Organization, Planning and Strategy
6/25/2021	Travis Close	0.2	\$850	\$170	Email to MTJ re: section of proposed joint letter brief on Operations Plans	Case Organization, Planning and Strategy
6/25/2021	Travis Close	1.2	\$850	\$1,020	Review/analyze docs from Carrie Baker (potential declarant & former employee) - # BKD1322956-BKD2319415 (-26 of 58)	Discovery (Non-Deposition)
6/25/2021	Travis Close	1.3	\$850	\$1,105	Review/analyze docs from Carrie Baker (potential declarant & former employee) - # BKD2319415-CDSS007114 (26-58 of 58)	Discovery (Non-Deposition)
6/25/2021	Travis Close	0.9	\$850	\$765	Analyze production by City of Scotts Valley (Scotts Valley facility) to organize/extract blueprints for reference in experts' reports	Experts (Including Retention)
6/25/2021	Travis Close	0.7	\$850	\$595	Analyze production by City of Scotts Valley (Scotts Valley facility) to organize/extract permits & correspondence for reference in experts' reports	Experts (Including Retention)
6/25/2021	Travis Close	0.7	\$850	\$595	Analyze production by City of Tracy (Tracy facility) to organize/extract blueprints for reference in experts' reports	Experts (Including Retention)
6/25/2021	Travis Close	0.6	\$850	\$510	Analyze production by City of Tracy (Tracy facility) to organize/extract permits & correspondence for reference in experts' reports	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/26/2021	Mark Johnson	5.5	\$1,150	\$6,325	prep for Garner depo, including review and add to draft outlines, review exhibits, coms w/ RLS	Depositions
6/26/2021	Rachel Steyer	0.2	\$750	\$150	preparing and sending declaration out for signature	Class Certification
6/26/2021	Rachel Steyer	1.0	\$750	\$750	organizing and gathering exhibits in preparation for upcoming depo	Depositions
6/27/2021	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re preparation of topics, questions and exhibits for Garner depo	Depositions
6/27/2021	Guy Wallace	4.4	\$1,350	\$5,940	review and analysis of emails from and to Garner, Dolcater, Bowman, Belford, Flynt re service alignment, overtime and labor expense controls; preparation of memo to MTJ re same re potential exhibits for Garner depo	Discovery (Non-Deposition)
6/27/2021	Guy Wallace	0.3	\$1,350	\$405	com's with Waters re preparation of draft facility reports	Experts (Including Retention)
6/27/2021	Mark Johnson	4.7	\$1,150	\$5,405	prep for Garner depo, including review of potential exhibits and work on outline, call w/ GBW (.3)	Depositions
6/28/2021	Guy Wallace	0.4	\$1,350	\$540	preparation of outline of MCC	Class Certification
6/28/2021	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re preparation for Garner depo	Depositions
6/28/2021	Mark Johnson	10.5	\$1,150	\$12,075	work on Garner depo, including calls w/ GBW, emails w/ COC for research of facts; working on outline	Depositions
6/28/2021	Mark Johnson	0.2	\$1,150	\$230	call w/ RLS re depo exhibits	Depositions
6/28/2021	Rachel Steyer	0.4	\$750	\$300	editing KDL draft declaration	Class Certification
6/28/2021	Rachel Steyer	0.2	\$750	\$150	reviewing NRD intake	Class Outreach and Contact
6/28/2021	Rachel Steyer	0.6	\$750	\$450	longer phone call with family member of former resident, interested in doing intake, scheduled time	Class Outreach and Contact
6/28/2021	Rachel Steyer	0.3	\$750	\$225	reviewing outstanding declarations to draft, email to NCN and NRD with assigned names	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/28/2021	Travis Close	0.8	\$850	\$680	Analyze production by City of Windsor (Windsor facility) to organize/extract permits & correspondence for reference in experts' reports	Case Organization, Planning and Strategy
6/28/2021	Travis Close	1.3	\$850	\$1,105	Review/analyze docs for class member Mary Irvin (CCRC issue from co-counsel) and whether defendants have produced a non-CCRC residency agreement	Discovery (Non-Deposition)
6/28/2021	Travis Close	0.9	\$850	\$765	Analyze production by City of Windsor (Windsor facility) to organize/extract blueprints for reference in experts' reports	Experts (Including Retention)
6/28/2021	Travis Close	0.7	\$850	\$595	Analyze production by City of Alhambra (Alhambra facility) to organize/extract blueprints for reference in experts' reports	Experts (Including Retention)
6/28/2021	Travis Close	0.6	\$850	\$510	Analyze production by City of Alhambra (Alhambra facility) to organize/extract permits & correspondence for reference in experts' reports	Experts (Including Retention)
6/28/2021	Travis Close	0.7	\$850	\$595	Analyze production by City of Anaheim (Anaheim facility) to organize/extract permits & correspondence for reference in experts' reports	Experts (Including Retention)
6/28/2021	Travis Close	0.7	\$850	\$595	Analyze production by City of Anaheim (Anaheim facility) to organize/extract blueprints for reference in experts' reports	Experts (Including Retention)
6/28/2021	Travis Close	0.6	\$850	\$510	Analyze production by City of Anaheim (Anaheim Hills facility) to organize/extract blueprints for reference in experts' reports	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/28/2021	Travis Close	0.6	\$850	\$510	Analyze production by City of Anaheim (Anaheim Hills facility) to organize/extract permits & correspondence for reference in experts' reports	Experts (Including Retention)
6/29/2021	Guy Wallace	0.4	\$1,350	\$540	com's with BBK; AX; MTJ; RLS re draft declarations of putative class members	Class Certification
6/29/2021	Mark Johnson	0.1	\$1,150	\$115	email LEC re exhibits for Garner depo.	Depositions
6/29/2021	Mark Johnson	8.3	\$1,150	\$9,545	work on depo prep for Garner depo	Depositions
6/29/2021	Mark Johnson	1.0	\$1,150	\$1,150	revise and update chart of status and next steps on outstanding discovery issues.	Discovery (Non-Deposition)
6/29/2021	Rachel Steyer	0.5	\$750	\$375	final read through call with declarant, making final last minute edits and tweaks	Class Certification
6/29/2021	Rachel Steyer	0.5	\$750	\$375	editing and revising draft NRD declaration	Class Certification
6/29/2021	Rachel Steyer	0.2	\$750	\$150	email to NRD with feedback and comments on draft declaration	Class Certification
6/29/2021	Rachel Steyer	0.2	\$750	\$150	phone call with KDL to discuss class member declaration/edits	Class Certification
6/29/2021	Rachel Steyer	0.2	\$750	\$150	editing and reviewing KDL draft declaration	Class Certification
6/29/2021	Rachel Steyer	0.4	\$750	\$300	preparing/combining files for depo	Depositions
6/29/2021	Rachel Steyer	0.3	\$750	\$225	phone call with MTJ to discuss depo prep	Depositions
6/29/2021	Rachel Steyer	0.3	\$750	\$225	updating exhibits for MTJ	Depositions
6/29/2021	Travis Close	0.2	\$850	\$170	Email to RAB re: bates stamped version of Bakersfield production	Case Organization, Planning and Strategy
6/29/2021	Travis Close	0.5	\$850	\$425	Review and analyze chart by MTJ re: status of discovery efforts and upcoming tasks	Discovery (Non-Deposition)
6/29/2021	Travis Close	0.7	\$850	\$595	Analyze production by City of Brea (Brea facility) to organize/extract blueprints for reference in experts' reports	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/29/2021	Travis Close	0.6	\$850	\$510	Analyze production by City of Brea (Brea facility) to organize/extract permits & correspondence for reference in experts' reports	Experts (Including Retention)
6/29/2021	Travis Close	0.6	\$850	\$510	Analyze production by City of Westminster (Brookhurst facility) to organize/extract blueprints for reference in experts' reports	Experts (Including Retention)
6/29/2021	Travis Close	0.5	\$850	\$425	Analyze production by City of Westminster (Brookhurst facility) to organize/extract permits & correspondence for reference in experts' reports	Experts (Including Retention)
6/29/2021	Travis Close	0.6	\$850	\$510	Analyze production by City of Whittier (Central Whittier facility) to organize/extract blueprints for reference in experts' reports	Experts (Including Retention)
6/29/2021	Travis Close	0.6	\$850	\$510	Analyze production by City of Whittier (Central Whittier facility) to organize/extract permits & correspondence for reference in experts' reports	Experts (Including Retention)
6/29/2021	Travis Close	0.5	\$850	\$425	Analyze production by City of Whittier (Uptown Whittier facility) to organize/extract blueprints for reference in experts' reports	Experts (Including Retention)
6/29/2021	Travis Close	0.6	\$850	\$510	Analyze production by City of Whittier (Uptown Whittier facility) to organize/extract permits & correspondence for reference in experts' reports	Experts (Including Retention)
6/30/2021	Guy Wallace	0.3	\$1,350	\$405	revise and edit draft class member declarations	Class Certification
6/30/2021	Guy Wallace	0.8	\$1,350	\$1,080	preparation of tasks for class certification motion	Class Certification
6/30/2021	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ; RLS re Garner depo	Depositions
6/30/2021	Mark Johnson	7.1	\$1,150	\$8,165	depo of Sheila Garner	Depositions
6/30/2021	Mark Johnson	0.5	\$1,150	\$575	review exhibits, outline and coms w/ GBW, RLS during lunch and breads during depo	Depositions
6/30/2021	Mark Johnson	1.6	\$1,150	\$1,840	depo prep prior to depo of Sheila Garner, including review exhibits and outline, minor modifications to outline; coms w/ RLS re exhibits, remote set up.	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/30/2021	Rachel Steyer	0.2	\$750	\$150	phone call w/MTJ during lunch break to discuss depo strategy and exhibits	Depositions
6/30/2021	Rachel Steyer	0.4	\$750	\$300	double checking exhibits prior to start of deposition	Depositions
6/30/2021	Rachel Steyer	7.1	\$750	\$5,325	attending and assisting MTJ with depo, organizing and introducing exhibits	Depositions
6/30/2021	Travis Close	0.6	\$850	\$510	Analyze production by City of Whittier (Casa Whittier facility) to organize/extract blueprints for reference in experts' reports	Experts (Including Retention)
6/30/2021	Travis Close	0.5	\$850	\$425	Analyze production by City of Whittier (Casa Whittier facility) to organize/extract permits & correspondence for reference in experts' reports	Experts (Including Retention)
6/30/2021	Travis Close	0.8	\$850	\$680	Analyze production by City of Corona (Corona facility) to organize/extract blueprints for reference in experts' reports	Experts (Including Retention)
6/30/2021	Travis Close	0.5	\$850	\$425	Analyze production by City of Corona (Corona facility) to organize/extract permits & correspondence for reference in experts' reports	Experts (Including Retention)
6/30/2021	Travis Close	0.6	\$850	\$510	Analyze production by City of Corona (Magnolia facility) to organize/extract blueprints for reference in experts' reports	Experts (Including Retention)
6/30/2021	Travis Close	0.5	\$850	\$425	Analyze production by City of Corona (Magnolia facility) to organize/extract permits & correspondence for reference in experts' reports	Experts (Including Retention)
7/1/2021	Guy Wallace	1.7	\$1,350	\$2,295	revise and edit draft declarations of putative class members; com's with Heywood and RLS re same	Class Certification
7/1/2021	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ re Garner deposition; MTC's; analysis of newly produced documents and ESI	Class Certification
7/1/2021	Guy Wallace	1.4	\$1,350	\$1,890	preparation of detailed outline of MCC	Class Certification
7/1/2021	Guy Wallace	0.6	\$1,350	\$810	analysis of expert issues and tasks; com's with MTJ re same	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/1/2021	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ; TCC re motions to compel re Rubin deposition; notice of corrective action	Other Motions
7/1/2021	Mark Johnson	0.6	\$1,150	\$690	prepare agenda for call with Marks, Thornton, Peters; review docs and prior emails relatd to same; com w/ GBW re same	Class Certification
7/1/2021	Mark Johnson	0.5	\$1,150	\$575	review communiciations re recent productions and update index; emails to staff and co-counsel re scope of same and priorities for review	Discovery (Non-Deposition)
7/1/2021	Rachel Steyer	0.6	\$750	\$450	editing and revising KDL draft declaration, looking for and reviewing resident residency agreement	Class Certification
7/1/2021	Rachel Steyer	0.6	\$750	\$450	editing NCN draft declaration	Class Certification
7/1/2021	Rachel Steyer	0.3	\$750	\$225	editing and revising NRD draft declaration	Class Certification
7/1/2021	Rachel Steyer	0.2	\$750	\$150	editing KDL draft declaration	Class Certification
7/1/2021	Rachel Steyer	0.6	\$750	\$450	reviewing emails forwarded from potential declarant, creating folder	Class Outreach and Contact
7/1/2021	Rachel Steyer	0.3	\$750	\$225	editing and reviewing RVR class member intake	Class Outreach and Contact
7/1/2021	Rachel Steyer	1.2	\$750	\$900	continued intake with class member, scheduled follow up call	Class Outreach and Contact
7/1/2021	Travis Close	0.3	\$850	\$255	Call with GBW re: new assignments - motion to compel depo of Kelly Rubin and corrective actions	Case Organization, Planning and Strategy
7/1/2021	Travis Close	1.3	\$850	\$1,105	Review & analyze recent production of ESI for emails containing Kelly Rubin	Discovery (Non-Deposition)
7/1/2021	Travis Close	1.0	\$850	\$850	Begin motion to compel depo of Kelly Rubin (review previous correspondence with opposing counsel & meet and confer notes	Discovery (Non-Deposition)
7/1/2021	Travis Close	0.8	\$850	\$680	Search for & compile all docs showing corrective actions from recent production	Discovery (Non-Deposition)
7/1/2021	Travis Close	0.9	\$850	\$765	Analyze production by City of Garden Grove (Garden Grove facility) to organize/extract blueprints for reference in experts' reports	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/1/2021	Travis Close	0.7	\$850	\$595	Analyze production by City of Garden Grove (Garden Grove facility) to organize/extract permits & correspondence for reference in experts' reports	Experts (Including Retention)
7/1/2021	Travis Close	0.7	\$850	\$595	Analyze production by City of Garden Grove (Valley View facility) to organize/extract blueprints for reference in experts' reports	Experts (Including Retention)
7/1/2021	Travis Close	0.6	\$850	\$510	Analyze production by City of Garden Grove (Valley View facility) to organize/extract permits & correspondence for reference in experts' reports	Experts (Including Retention)
7/2/2021	Guy Wallace	0.4	\$1,350	\$540	review and analysis of draft Marquis declaration; com's with MTJ re same	Class Certification
7/2/2021	Guy Wallace	1.4	\$1,350	\$1,890	com's with Marks; Ballette; Thornton; Blake; MTJ re preparation of staffing analysis and Flores Declaration	Class Certification
7/2/2021	Guy Wallace	0.6	\$1,350	\$810	com's with RLS; MTJ re preparation of class member declarations	Class Certification
7/2/2021	Guy Wallace	0.6	\$1,350	\$810	com's with JY; KES; MTJ; TCC; RAB; JMP; CC; Dion re document review and analysis, including D's recent production and analysis of Rubin emails	Class Certification
7/2/2021	Guy Wallace	0.5	\$1,350	\$675	com's with JY; KES; MTJ; TCC; RLS; RAB re class member declarations; Rule 30(b)(6) depositions; motions to compel	Class Certification
7/2/2021	Guy Wallace	0.7	\$1,350	\$945	analysis of P's critique of D's policies and practices re emergency evacuation of residents with disabilities	Class Certification
7/2/2021	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of training topic; preparation of questions re same; com's with JY and MTJ re same	Depositions
7/2/2021	Mark Johnson	0.5	\$1,150	\$575	call w/ K Marquis re declaration concerning review of residency agreeents	Class Certification
7/2/2021	Mark Johnson	1.5	\$1,150	\$1,725	conference call w/ expert team Marks, Thornton, Peters, GBW, JB. re staffing analysis, info needed from depositions, etc.	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/2/2021	Mark Johnson	1.0	\$1,150	\$1,150	team mtg re document review status and priorities for depositions; strategids on motions to compel.	Class Certification
7/2/2021	Mark Johnson	2.7	\$1,150	\$3,105	review recently produced docs, including Bowman emails and attachmens, emails re norms, benchmarks	Class Certification
7/2/2021	Mark Johnson	0.5	\$1,150	\$575	call w/ GBW and JY re 30b6 training depo scope, topics, potential exhibits and training	Depositions
7/2/2021	Rachel Steyer	0.5	\$750	\$375	weekly meeting with team and co-counsel to review ongoing assignments for class certificaiton	Case Organization, Planning and Strategy
7/2/2021	Rachel Steyer	0.4	\$750	\$300	ongoing review of sharepoint intakes and declarations	Case Organization, Planning and Strategy
7/2/2021	Rachel Steyer	0.5	\$750	\$375	editing and revising NRD draft declaration	Class Certification
7/2/2021	Rachel Steyer	0.5	\$750	\$375	reviewing and editing older class member declaration	Class Certification
7/2/2021	Rachel Steyer	0.3	\$750	\$225	phone call with GBW to discuss declaration drafting/gathering	Class Certification
7/2/2021	Rachel Steyer	0.3	\$750	\$225	phone call with class member to review and finalize declaration	Class Certification
7/2/2021	Rachel Steyer	1.2	\$750	\$900	editing and writing class member declaration	Class Certification
7/2/2021	Travis Close	0.7	\$850	\$595	Review and analyze prior discovery letters filed & court orders re: depositions	Case Organization, Planning and Strategy
7/2/2021	Travis Close	1.2	\$850	\$1,020	Legal research re: how many depositions are allowed to be taken before class certification	Case Organization, Planning and Strategy
7/2/2021	Travis Close	1.4	\$850	\$1,190	Doc review & general litigation team meetings (re: SA docs. upcoming depositions, motions to compel, declarations, etc	Case Organization, Planning and Strategy
7/2/2021	Travis Close	0.8	\$850	\$680	Analyze organizational charts to determine Kelly Rubin's role in Service Alignment department over time	Case Organization, Planning and Strategy
7/2/2021	Travis Close	1.2	\$850	\$1,020	Draft motion to compel deposition of Kelly Rubin (outline, arguments)	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/2/2021	Travis Close	1.1	\$850	\$935	Analyze prior deposition testimony by Kevin Bowman re: expertise with Brookdale's staffing at corporate level	Depositions
7/2/2021	Travis Close	0.5	\$850	\$425	Analyze depo of Marrie harris for testimony re: corporate control of service alignment	Depositions
7/2/2021	Travis Close	1.4	\$850	\$1,190	Review/analyze emails From Kelly Rubin (including Redacted) in our productions to-date	Discovery (Non-Deposition)
7/3/2021	Guy Wallace	3.8	\$1,350	\$5,130	review and analysis of D's policies and procedures re emergency evacuation; legal research and analysis re same	Class Certification
7/3/2021	Guy Wallace	0.6	\$1,350	\$810	review and analysis of ED training documents; com's with JY; MTJ re same	Class Certification
7/3/2021	Guy Wallace	0.5	\$1,350	\$675	review and analysis of draft class member declarations and RLS emails re same	Class Certification
7/3/2021	Rachel Steyer	0.3	\$750	\$225	editing KDL draft declaration	Class Certification
7/4/2021	Mark Johnson	2.4	\$1,150	\$2,760	review and propose edits to class member decs iso class cert	Class Certification
7/5/2021	Guy Wallace	5.8	\$1,350	\$7,830	revise and edit draft class member declarations	Class Certification
7/5/2021	Mark Johnson	3.5	\$1,150	\$4,025	review and edit multiple draft declarations from class members, coms w/ GBW, RLS re same	Class Certification
7/5/2021	Mark Johnson	5.0	\$1,150	\$5,750	work on outline for topic 5 depo; review related documents including past and potential exhibits, draft 4 page ltr to OC re expectations for testimony	Depositions
7/5/2021	Rachel Steyer	0.7	\$750	\$525	reviewing GBW and MTJ edits to declaration, incorporating and updating drafts	Class Certification
7/6/2021	Guy Wallace	1.6	\$1,350	\$2,160	review and analysis of D's emergency evacuation policies, procedures and plans; analysis of problems re same	Class Certification
7/6/2021	Guy Wallace	1.5	\$1,350	\$2,025	revise and edit draft class member declarations; com's with MTJ; RLS re same	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/6/2021	Guy Wallace	1.2	\$1,350	\$1,620	revise and edit letter to D's re topic 5 deposition; analysis of issues to be covered at deposition; com's with MTJ re same	Depositions
7/6/2021	Guy Wallace	0.9	\$1,350	\$1,215	com's with Cross re transportation issues and preparation of class cert declaration	Experts (Including Retention)
7/6/2021	Guy Wallace	0.4	\$1,350	\$540	review and analysis of transportation access issues; com's with MTJ re same	Experts (Including Retention)
7/6/2021	Mark Johnson	2.3	\$1,150	\$2,645	review and propose edits to class member / rep declarations; facility research re same.	Class Certification
7/6/2021	Mark Johnson	3.3	\$1,150	\$3,795	review and propose edits to declarations of reps of class members; coms w/ RLS, GBW re same	Class Certification
7/6/2021	Mark Johnson	2.4	\$1,150	\$2,760	add to outline on 30b6 topic 5 depo; identify and review exhibits for same	Depositions
7/6/2021	Mark Johnson	0.4	\$1,150	\$460	revise and finalize correspondence to OC re 30b6 topic 5 depo; look up referenced documents for same	Depositions
7/6/2021	Mark Johnson	0.7	\$1,150	\$805	review list of doc categories requested from damages experts; annotate list with info re availability of docs, proposed responses and questions; com w/ GBW re same	Experts (Including Retention)
7/6/2021	Mark Johnson	0.4	\$1,150	\$460	call w/ tcc re motion to compel Rubin depo	Other Motions
7/6/2021	Rachel Steyer	0.2	\$750	\$150	editing and reviewing GBW and MTJ edits to draft declaration, incorporating and updating	Class Certification
7/6/2021	Rachel Steyer	0.6	\$750	\$450	finishing drafting class member declaration to send to GBW and MTJ	Class Certification
7/6/2021	Rachel Steyer	0.2	\$750	\$150	editing and reviewing NRD draft declaration	Class Certification
7/6/2021	Rachel Steyer	0.2	\$750	\$150	editing and incorporating GBW and MTJ edits to draft declaration	Class Certification
7/6/2021	Rachel Steyer	0.5	\$750	\$375	incorporating RVR comments to draft declaration following read through with declarant	Class Certification
7/6/2021	Rachel Steyer	1.8	\$750	\$1,350	drafting class member declaration	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/6/2021	Rachel Steyer	0.2	\$750	\$150	phone call with KDL to review question re declaration, final assignments for the week	Class Certification
7/6/2021	Rachel Steyer	0.6	\$750	\$450	communications on teams with NRD, KDL, NCN regarding outreach assignments, reviewing and finalizing declarations	Class Certification
7/6/2021	Rachel Steyer	0.6	\$750	\$450	editing and revising NCN draft declaration	Class Certification
7/6/2021	Rachel Steyer	1.0	\$750	\$750	editng and writing class member declaration	Class Certification
7/6/2021	Rachel Steyer	0.2	\$750	\$150	editing draft email prepared by NRD to send to declarants	Class Outreach and Contact
7/6/2021	Travis Close	0.3	\$850	\$255	Call with MTJ re: strategy for motion to compel depo of Kelly Rubin	Case Organization, Planning and Strategy
7/6/2021	Travis Close	1.2	\$850	\$1,020	Continue drafting motion to compel depo of Kelly Rubin (argument: highly relevant to staffing claims	Case Organization, Planning and Strategy
7/6/2021	Travis Close	0.9	\$850	\$765	Analyze joint discovery letter briefs submitted to court for refrences to service alignment, staffing & budgets	Class Certification
7/6/2021	Travis Close	1.1	\$850	\$935	Anaylze Ps' RFPs for references to service alignment, staffing & budgets	Class Certification
7/6/2021	Travis Close	1.2	\$850	\$1,020	Legal research re: which type of discovery can be taken before class certification	Class Certification
7/6/2021	Travis Close	1.5	\$850	\$1,275	Continue drafting motion to compel depo of Kelly Rubin (argument: not new discovery)	Class Certification
7/7/2021	Guy Wallace	1.4	\$1,350	\$1,890	revise and edit draft class member declarations; com's with RLS; MTJ re same	Class Certification
7/7/2021	Guy Wallace	1.2	\$1,350	\$1,620	analysis of 2020 Emergency Manual; facility-specific evacuation plans; com's with MTJ and TCC re same	Class Certification
7/7/2021	Guy Wallace	0.9	\$1,350	\$1,215	revise and edit draft class member declarations prepared by RLS	Class Certification
7/7/2021	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ re staffing depo	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/7/2021	Guy Wallace	0.5	\$1,350	\$675	review and analysis of list of facilities from Thornton; selection of sample of six facilities for initial staffing analysis; com's with MTJ re same	Experts (Including Retention)
7/7/2021	Guy Wallace	0.3	\$1,350	\$405	com's with Cross re draft declaration for MCC	Experts (Including Retention)
7/7/2021	Guy Wallace	0.4	\$1,350	\$540	analysis of and com's with MTJ re request for materials from LP; com's with LP re same	Experts (Including Retention)
7/7/2021	Guy Wallace	0.2	\$1,350	\$270	com's with Kailes re analysis of D's emergency evacuation plans	Experts (Including Retention)
7/7/2021	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re input on choices of facilities for staffing analyses and response to email from J Thornton	Class Certification
7/7/2021	Mark Johnson	0.5	\$1,150	\$575	call w/ GBW re categories of docs requested by damages experts, availability of same and response, proposed call	Class Certification
7/7/2021	Mark Johnson	1.4	\$1,150	\$1,610	review and propose edits to declarations from family members of class members	Class Certification
7/7/2021	Mark Johnson	0.2	\$1,150	\$230	call w/ former P sharon Eidler re development and contact with class member	Class Certification
7/7/2021	Mark Johnson	0.6	\$1,150	\$690	call w/ GBW re issues for topic 5 depo - norms, customization and benchmarks	Class Certification
7/7/2021	Mark Johnson	0.2	\$1,150	\$230	email coms w/ /RLS re contacting class member spouse identified from complaint in doc production.	Class Certification
7/7/2021	Mark Johnson	3.2	\$1,150	\$3,680	review document productions purporting to include task time study-related documents	Depositions
7/7/2021	Mark Johnson	0.5	\$1,150	\$575	draft email to doc reviewers re research and doc review assignments for potential depo exhibits for 30b6 depo topic 5	Depositions
7/7/2021	Mark Johnson	1.8	\$1,150	\$2,070	prep for 30b6 topic 5 depo, including review of exhibits, work on outline	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/7/2021	Mark Johnson	0.2	\$1,150	\$230	draft clarifying email to OC re scope of 30b6 depo, topic 5	Depositions
7/7/2021	Rachel Steyer	0.6	\$750	\$450	reviewing and incorporating GBW and MTJ feedback into draft declarations	Class Certification
7/7/2021	Rachel Steyer	0.5	\$750	\$375	completing drafting declaration before sending to GBW and MTJ	Class Certification
7/7/2021	Rachel Steyer	0.9	\$750	\$675	phone call with class mmeber declarnt to review and finalize declaratino	Class Certification
7/7/2021	Rachel Steyer	0.2	\$750	\$150	phone call with NRD to discuss intake and potential declarant	Class Certification
7/7/2021	Rachel Steyer	0.5	\$750	\$375	conducted final read through call with declarant to review and finalize declaration	Class Certification
7/7/2021	Rachel Steyer	0.6	\$750	\$450	follow up call with declarant to review outstanding questions in declaration, scheduled final call for read through	Class Certification
7/7/2021	Rachel Steyer	0.7	\$750	\$525	editing NCN draft declaration	Class Certification
7/7/2021	Rachel Steyer	0.4	\$750	\$300	editing RVR intake	Class Outreach and Contact
7/7/2021	Rachel Steyer	0.3	\$750	\$225	phone call w/potential class member, set up follow up call to discuss case further	Class Outreach and Contact
7/7/2021	Rachel Steyer	0.3	\$750	\$225	reviewing sharepoint and intakes and declarations that need to be drafted/updated/signed	Class Outreach and Contact
7/7/2021	Rachel Steyer	0.2	\$750	\$150	reviewing updated RVR intake, evaluating suitability for declaration	Class Outreach and Contact
7/7/2021	Rachel Steyer	0.5	\$750	\$375	communications on Teams with KDL, NRD, RVR, NCN regarding ongoing outreach assignmetns, declaration drafting	Class Outreach and Contact
7/7/2021	Travis Close	1.3	\$850	\$1,105	Legal research - whether depositions may be taken when duplicative discovery exists	Case Organization, Planning and Strategy
7/7/2021	Travis Close	0.3	\$850	\$255	Review & analyze examples of corrective action docs found by doc reviewers for motion to compel	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/7/2021	Travis Close	0.5	\$850	\$425	Analyze prior correspondence re: facility corrective actions	Case Organization, Planning and Strategy
7/7/2021	Travis Close	1.5	\$850	\$1,275	Continue revising and finalizing first draft of motion to compel depo of Kelly Rubin before sending to team	Discovery (Non-Deposition)
7/7/2021	Travis Close	0.2	\$850	\$170	Call from GBW re: question about content of emergency evacuation plans	Discovery (Non-Deposition)
7/8/2021	Guy Wallace	0.8	\$1,350	\$1,080	revise and edit draft class member declarations	Class Certification
7/8/2021	Guy Wallace	0.3	\$1,350	\$405	analysis of emergency evacuation manuals and problems with same, including but not limited to unlawful policies re transportation	Class Certification
7/8/2021	Guy Wallace	0.5	\$1,350	\$675	com's with JY; MTJ re upcoming Rule 30(b)(6) depositions and schedule for and preparation for same	Depositions
7/8/2021	Guy Wallace	2.9	\$1,350	\$3,915	preparation of objectives; topics; questions for topic 5 of Rule 30(b)(6) deposition	Depositions
7/8/2021	Guy Wallace	0.9	\$1,350	\$1,215	com's with MTJ re meet and confer re authentication issues and topic 5 of Rule 30(b)(6) deposition	Discovery (Non-Deposition)
7/8/2021	Guy Wallace	0.6	\$1,350	\$810	com's with Kennedy; LP; MTJ re materials for damages methodology	Experts (Including Retention)
7/8/2021	Guy Wallace	1.5	\$1,350	\$2,025	legal research and analysis re transportation issues; review and analysis of materials from Doug Cross	Misc. Research
7/8/2021	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of draft letter re MTC of Rubin; revise and edit same	Other Motions
7/8/2021	Guy Wallace	0.5	\$1,350	\$675	analysis of potential range of damages settlement based on ADA and Unruh Act violations	Settlement
7/8/2021	Mark Johnson	0.9	\$1,150	\$1,035	calls (x6) w/ GBW re class declarations, topic 5 deposition, responnding to email from OC re scope of topic 5 deposition	Class Certification
7/8/2021	Mark Johnson	0.9	\$1,150	\$1,035	call w/ GBW re stategy for meet and confer call re depo on topic 5, issues to be addressed on topic 5.	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/8/2021	Mark Johnson	0.3	\$1,150	\$345	coms w/ GBW and JY re rescheduling training 30b6 depo and prep for same	Depositions
7/8/2021	Mark Johnson	5.4	\$1,150	\$6,210	work on prep for topic 5 dep including review of potential exhibits on benchmarks, customization, service alignment enforcement, add to outline	Depositions
7/8/2021	Mark Johnson	0.1	\$1,150	\$115	review email from COC BBK re meet and confer on complaints; email to OC re same	Discovery (Non-Deposition)
7/8/2021	Mark Johnson	0.5	\$1,150	\$575	call w GBW and damages experts re materials they need	Experts (Including Retention)
7/8/2021	Mark Johnson	0.7	\$1,150	\$805	pull pleadings, relevant discovery and other docs for damages experts; coms w/ RAB re identifying and sending other designated documents by FTP	Experts (Including Retention)
7/8/2021	Rachel Steyer	0.2	\$750	\$150	updating and editing declaration for NCN to finalize	Class Certification
7/8/2021	Rachel Steyer	0.4	\$750	\$300	searching records for likely class member declarant	Class Certification
7/8/2021	Rachel Steyer	0.2	\$750	\$150	email to NCN with info and docs re resident for declaration	Class Certification
7/8/2021	Rachel Steyer	0.5	\$750	\$375	final read through call with class member declarant	Class Certification
7/8/2021	Rachel Steyer	0.5	\$750	\$375	editing and updating class member declaration	Class Certification
7/8/2021	Rachel Steyer	1.3	\$750	\$975	drafting class member declaration	Class Certification
7/8/2021	Rachel Steyer	1.9	\$750	\$1,425	drafting class member declaration	Class Certification
7/8/2021	Rachel Steyer	0.2	\$750	\$150	editing NCN draft declaration	Class Certification
7/8/2021	Rachel Steyer	0.2	\$750	\$150	editing NCN draft declaration	Class Certification
7/8/2021	Rachel Steyer	0.3	\$750	\$225	call with BCR to review and update her on outreach assignments and declaration draftgin	Class Outreach and Contact
7/8/2021	Rachel Steyer	0.7	\$750	\$525	communications with BCR, NCN, NRD, KDL, RVR over teams to discuss ongoing outreach and assignments, declaration drafting	Class Outreach and Contact
7/8/2021	Travis Close	0.4	\$850	\$340	Review, Analyze, & organize examples of Corrective Actions produced for motion to compel	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/8/2021	Travis Close	0.8	\$850	\$680	Analyze discovery requests and responses to identify requests under which "corrective actions" could fall	Class Certification
7/8/2021	Travis Close	1.3	\$850	\$1,105	Begin drafting motion to compel corrective actions/action plans	Discovery (Non-Deposition)
7/8/2021	Travis Close	0.5	\$850	\$425	Analyze prior discovery correspondence to determine extent of meet/confer on action plans	Discovery (Non-Deposition)
7/9/2021	Guy Wallace	1.5	\$1,350	\$2,025	revise and edit draft class member declarations	Class Certification
7/9/2021	Guy Wallace	0.5	\$1,350	\$675	com's with KES; RAB; CXC; EAO; JMP; re document review and analysis re Bowman emails; staffing; training	Class Certification
7/9/2021	Guy Wallace	0.8	\$1,350	\$1,080	com's with GG; BBK; JY; AX; MTJ; TCC; RLS re class member declarations; Bowman deposition; expert declarations; preparation for MCC	Class Certification
7/9/2021	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ; RLS re preparation of class member declarations	Class Certification
7/9/2021	Guy Wallace	0.7	\$1,350	\$945	review and analysis of approach re readily achievable barrier removal; com's with GG; Waters re same	Class Certification
7/9/2021	Guy Wallace	1.9	\$1,350	\$2,565	preparation of objectives, questions, exhibits re topic 5 deposition; com's with MTJ re same	Depositions
7/9/2021	Guy Wallace	0.9	\$1,350	\$1,215	com's with Thornton; BBK; MTJ re preparation for Rule 30(b)(6) deposition topic 5; Flores analysis of citations; assessment data information re disability counts	Experts (Including Retention)
7/9/2021	Guy Wallace	1.3	\$1,350	\$1,755	com's with Kailes re D's emergency manuals and evacuation plans	Experts (Including Retention)
7/9/2021	Guy Wallace	0.7	\$1,350	\$945	legal research and analysis re Cal. Health and Safety Code requirements re evacuation of RCFEs; regulations re same	Misc. Research
7/9/2021	Guy Wallace	1.4	\$1,350	\$1,890	revise and edit draft motion to compel deposition of Kelly Rubin; com's with TCC; MTJ re same	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/9/2021	Mark Johnson	1.1	\$1,150	\$1,265	weekly meeting re doc review, depo prep for topic 5, strategy for other tasks.	Class Certification
7/9/2021	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW and RLS to discuss oversight of collection of class declarations; staffing for same,	Class Certification
7/9/2021	Mark Johnson	0.8	\$1,150	\$920	meet and confer w/ MJacobsen, J Riley re scope of depo topic 5 and objections re authenticity.	Depositions
7/9/2021	Mark Johnson	0.3	\$1,150	\$345	prep for meet and confer on scope of topic 5 depo; review correspondence and email and depo notice	Depositions
7/9/2021	Mark Johnson	0.2	\$1,150	\$230	follow-up call w/ GBW re results of meet and confer and strategy for depo.	Depositions
7/9/2021	Rachel Steyer	0.7	\$750	\$525	weekly meeting with RBGG team and SWCK team to discuss ongoing assignments for class cert motion	Case Organization, Planning and Strategy
7/9/2021	Rachel Steyer	0.8	\$750	\$600	final read through call with class member declarant to finalize declaration, making last minute edits and changes to declaration	Class Certification
7/9/2021	Rachel Steyer	0.7	\$750	\$525	phone call with class member declarant to review and finalize declaration	Class Certification
7/9/2021	Rachel Steyer	0.5	\$750	\$375	phone call with GBW and MTJ to discuss declarations	Class Certification
7/9/2021	Rachel Steyer	0.3	\$750	\$225	email to GBW and MTJ with question about declarant and declaration template	Class Certification
7/9/2021	Rachel Steyer	0.4	\$750	\$300	final read through call with clsas member declarant	Class Certification
7/9/2021	Rachel Steyer	0.4	\$750	\$300	phone call with declarant to review and finalize declaration	Class Certification
7/9/2021	Rachel Steyer	0.2	\$750	\$150	editing and updating declaration template	Class Certification
7/9/2021	Rachel Steyer	0.4	\$750	\$300	email to RVR, NCN, NRD, KDL, BCR re updated declaration template	Class Certification
7/9/2021	Rachel Steyer	0.2	\$750	\$150	response to BCR, KDL, TRB regarding KDL's outstanding assignments that will be reassigned to BCR	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/9/2021	Rachel Steyer	0.2	\$750	\$150	email to BCR, RVR, NRD, NCN re updating declarations that are out for declaration but not yet signed	Class Certification
7/9/2021	Rachel Steyer	0.2	\$750	\$150	phone call w/GBW to discuss revised declaration drafting template	Class Certification
7/9/2021	Rachel Steyer	0.3	\$750	\$225	editing and reviewing declaration for NRD	Class Certification
7/9/2021	Rachel Steyer	0.3	\$750	\$225	conversations with KDL, BCR, NRD, NCN re ongoing outreach assignments	Class Outreach and Contact
7/9/2021	Travis Close	1.2	\$850	\$1,020	Weekly doc review & litigation team meetings discussing: SA depo prep; class cert strategy, redactions and files needed under seal, & progress on class members declarations	Case Organization, Planning and Strategy
7/9/2021	Travis Close	1.1	\$850	\$935	Begin drafting motion to compel corrective actions & action plans (review notes from M/C and draft outline)	Case Organization, Planning and Strategy
7/9/2021	Travis Close	0.9	\$850	\$765	Review/analyze emails matching "Service alignment" produced in July -- # BKD2902821-BKD2914858 (1-28 of 78)	Discovery (Non-Deposition)
7/9/2021	Travis Close	1.1	\$850	\$935	Review/analyze emails matching "Service alignment" produced in July -- # BKD2914858-BKD2934935 (28-78 of 78)	Discovery (Non-Deposition)
7/9/2021	Travis Close	1.4	\$850	\$1,190	Continue drafting motion to compel corrective actions and action plans (summary of M/C efforts and argument)	Discovery (Non-Deposition)
7/10/2021	Guy Wallace	1.1	\$1,350	\$1,485	analysis of topics, questions and exhibits re D's staffing procedures and Service Alignment; com's with MTJ re same	Depositions
7/10/2021	Guy Wallace	0.6	\$1,350	\$810	com's with Waters re facility reports and readily achievable barrier removal	Experts (Including Retention)
7/10/2021	Mark Johnson	7.7	\$1,150	\$8,855	prep for 30b6 depo on topic 5	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/11/2021	Guy Wallace	3.8	\$1,350	\$5,130	preparation and drafting of detailed outline re class cert brief	Class Certification
7/11/2021	Guy Wallace	0.8	\$1,350	\$1,080	legal research and analysis re J. Gilliam and class cert decisions	Class Certification
7/11/2021	Guy Wallace	2.2	\$1,350	\$2,970	preparation of topics and questions re Rule 30(b)(6) topic 5 deposition; review and analysis of CXC emails and exhibits re same	Depositions
7/11/2021	Guy Wallace	0.7	\$1,350	\$945	review and analysis of D's 2020 Emergency Manual	Misc. Research
7/11/2021	Mark Johnson	10.0	\$1,150	\$11,500	prepare for 30b6 depo topic 5, including review of new docs, add to outline	Depositions
7/12/2021	Guy Wallace	1.6	\$1,350	\$2,160	preparation of topics; questions for deposition re topic 5; Depositions com's with MTJ re same	Depositions
7/12/2021	Guy Wallace	0.4	\$1,350	\$540	com's with Cross re draft declaration re MCC	Experts (Including Retention)
7/12/2021	Guy Wallace	1.1	\$1,350	\$1,485	com's with Kailes; Thornton; Peters; TCC re counts of residents with mobility, vision and/or hearing impairments; emergency evacuation issues	Experts (Including Retention)
7/12/2021	Mark Johnson	13.2	\$1,150	\$15,180	prep for 30b6 depo on topic 5 re staffing, etc.	Depositions
7/12/2021	Rachel Steyer	0.2	\$750	\$150	reviewing updated declaration drafting template from GBW	Class Certification
7/12/2021	Rachel Steyer	0.5	\$750	\$375	reviewing signed declaration to ensure conformity with newer template	Class Certification
7/12/2021	Rachel Steyer	0.3	\$750	\$225	conversations with NRD, BCR, TRB, NCN on teams re outreach assignments	Class Certification
7/12/2021	Rachel Steyer	0.3	\$750	\$225	emails with co-counsel concerning outreach/contacts with class mmebers	Class Outreach and Contact
7/12/2021	Rachel Steyer	0.8	\$750	\$600	reviewing MTJ depo prpe outline, double checking exhibits and uploading to folder	Depositions
7/12/2021	Rachel Steyer	0.3	\$750	\$225	reviewing previously marked exhibits and answering MTJ question	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/12/2021	Travis Close	0.2	\$850	\$170	Research Judge beeler's standing order re: dates for replying to joint letter brief	Case Organization, Planning and Strategy
7/12/2021	Travis Close	0.8	\$850	\$680	Final revisions to joint letter brief re: kelly rubin deposition before sending over to opposing counsel	Case Organization, Planning and Strategy
7/12/2021	Travis Close	0.5	\$850	\$425	Research cases citing 22 CCR § 87212 (emergency/disaster plan)	Case Organization, Planning and Strategy
7/12/2021	Travis Close	0.5	\$850	\$425	Research cases citing statute § 1569.695. on emergency evacuation and disaster plans	Case Organization, Planning and Strategy
7/12/2021	Travis Close	0.2	\$850	\$170	Email to emergency evac expert re: sharing relevant DSS regulations & class outreach script	Class Certification
7/12/2021	Travis Close	0.2	\$850	\$170	Edits to template class outreach script & send to expert June Kailes	Class Outreach and Contact
7/12/2021	Travis Close	0.2	\$850	\$170	Email to opposing counsel re: draft joint letter compelling kelly rubin for deposition	Depositions
7/12/2021	Travis Close	0.2	\$850	\$170	Email to MTJ re: assistance with depositons tomorrow & Wednesday	Depositions
7/12/2021	Travis Close	0.2	\$850	\$170	Email to MTJ/GBW re: question about how many days until reply due for joint letter brief	Discovery (Non-Deposition)
7/12/2021	Travis Close	1.2	\$850	\$1,020	Research emergency evacu & planning DSS regs for expert June Kailes	Experts (Including Retention)
7/13/2021	Guy Wallace	1.3	\$1,350	\$1,755	legal research and analysis re happy camper declarations and weight to be accorded same; com's with CJH re same	Class Certification
7/13/2021	Guy Wallace	1.6	\$1,350	\$2,160	preparation and drafting of class cert reply brief	Class Certification
7/13/2021	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re topic 5 depositions and Bowman testimony	Depositions
7/13/2021	Guy Wallace	0.6	\$1,350	\$810	com's with Thornton re staffing analysis of AL and MC facilities	Experts (Including Retention)
7/13/2021	Mark Johnson	6.2	\$1,150	\$7,130	topic 5 depo, day 1	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/13/2021	Mark Johnson	1.0	\$1,150	\$1,150	prep and set up before topic 5 depo day 1, including call w/ TCC, RLS	Depositions
7/13/2021	Mark Johnson	5.5	\$1,150	\$6,325	prep for day 2 of topic 5 30b6 depo	Depositions
7/13/2021	Mark Johnson	5.8	\$1,150	\$6,670	prep for topic 12 depo, including review of docs and revision to outline.	Depositions
7/13/2021	Rachel Steyer	0.5	\$750	\$375	ongoing communuciations with NRD, BCR, NCN re finalizing and updating declarations, updating them, class contact	Class Certification
7/13/2021	Rachel Steyer	6.2	\$750	\$4,650	attended depo and assisted MTJ with presenting and organizing exhibits	Depositions
7/13/2021	Rachel Steyer	1.1	\$750	\$825	preparing and organizing exhibits for deposition, reviewing outline, compiling and reviewing documents	Discovery (Non-Deposition)
7/13/2021	Travis Close	0.6	\$850	\$510	Research resident's right to request records (incl. residency agreement) in RCFE regulations	Case Organization, Planning and Strategy
7/13/2021	Travis Close	0.4	\$850	\$340	Analye Brookdale's obligations re: producing residency agreemnts per Judge Beeler's order	Class Certification
7/14/2021	Guy Wallace	3.1	\$1,350	\$4,185	preparation and drafting of detailed outline of class cert brief	Class Certification
7/14/2021	Guy Wallace	1.7	\$1,350	\$2,295	preparation and drafting of MCC	Class Certification
7/14/2021	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ re deposition testimony of Bowman re topic 5	Depositions
7/14/2021	Guy Wallace	0.3	\$1,350	\$405	com's with CC re documents re community customization and advanced customization require approval from senior Brookdale officials	Discovery (Non-Deposition)
7/14/2021	Guy Wallace	0.3	\$1,350	\$405	review and analysis of summary of preliminary expert opinions from Cross	Experts (Including Retention)
7/14/2021	Guy Wallace	1.8	\$1,350	\$2,430	review and analysis of draft expert facility report re Brentwood facility	Experts (Including Retention)
7/14/2021	Mark Johnson	0.7	\$1,150	\$805	debrief and planning call w/ GBW re topic 5 30b6 depo testmiony follwing conclsn of depo	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/14/2021	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW during lunch break in 30b6 topic 5 depo re testimony and suggested questions	Depositions
7/14/2021	Mark Johnson	0.3	\$1,150	\$345	talk to TCC re depo testimony from 30b6 witness on topic 5	Depositions
7/14/2021	Mark Johnson	6.7	\$1,150	\$7,705	day 2 of 30b6 depo on topic 5	Depositions
7/14/2021	Rachel Steyer	0.2	\$750	\$150	email to BCR outlining ongoing tasks and assignments	Class Certification
7/14/2021	Rachel Steyer	0.3	\$750	\$225	ongoing communication on Teams with NRD, BCR, NCN, TRB re outreach and assignments	Class Certification
7/14/2021	Rachel Steyer	6.6	\$750	\$4,950	attended and assisted MTJ with exhibits in continuation of 30b6 topic 5 depo	Depositions
7/14/2021	Travis Close	0.2	\$850	\$170	Email to MTJ re: which subsidiaries in Ownership chart are also BKD subsidiaries	Case Organization, Planning and Strategy
7/14/2021	Travis Close	0.2	\$850	\$170	Email to MTJ re: notes from today/yesterday's depo	Case Organization, Planning and Strategy
7/14/2021	Travis Close	0.2	\$850	\$170	Analyze status of claims for class member Bonita Hall	Class Outreach and Contact
7/14/2021	Travis Close	0.2	\$850	\$170	email to MTJ re: recent 10-ks for use in depo; concern about separate filings of Ex. 21	Depositions
7/14/2021	Travis Close	0.4	\$850	\$340	Research which licensees listed in Ownership Chart (produced by Defs are also subsidiaries of Brookdale	Depositions
7/15/2021	Guy Wallace	0.5	\$1,350	\$675	com's with Marks re preparation of MCC	Class Certification
7/15/2021	Guy Wallace	0.3	\$1,350	\$405	com's with GG re preparation of MCC	Class Certification
7/15/2021	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ re motion for class certification and tasks re same	Class Certification
7/15/2021	Guy Wallace	2.8	\$1,350	\$3,780	preparation of motion for class certification	Class Certification
7/15/2021	Guy Wallace	0.4	\$1,350	\$540	com's with BBK; RLS re preparation of class representative; class member declarations re MCC	Class Certification
7/15/2021	Guy Wallace	0.9	\$1,350	\$1,215	revise and edit detailed outline of class cert brief	Class Certification
7/15/2021	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ re Rubin deposition and MTC re same; draft Declaration of Lindstrom; preparation of statement of facts for MCC	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/15/2021	Guy Wallace	0.3	\$1,350	\$405	com's with Waters; Mastin re preparation of draft facility reports	Experts (Including Retention)
7/15/2021	Rachel Steyer	0.3	\$750	\$225	phoen call with GBW to discuss status of class member declarations	Class Certification
7/15/2021	Rachel Steyer	0.4	\$750	\$300	reviewing and editing NRD draft declaration	Class Certification
7/15/2021	Rachel Steyer	0.4	\$750	\$300	editing and revising NCN class member declaration	Class Certification
7/15/2021	Rachel Steyer	0.6	\$750	\$450	editing and revising NCN class member declarations	Class Certification
7/15/2021	Rachel Steyer	1.9	\$750	\$1,425	reviewing status of KDL draft declarations, updating accordingly	Class Certification
7/15/2021	Rachel Steyer	0.3	\$750	\$225	call with BCR to review outreach assignments	Class Outreach and Contact
7/15/2021	Rachel Steyer	0.3	\$750	\$225	communications with NRD, NCN, TRB, BCR, RVR, RAG on teams to review ongoing assignments	Class Outreach and Contact
7/15/2021	Rachel Steyer	0.5	\$750	\$375	reviewing and updating sharepoint assignments	Class Outreach and Contact
7/15/2021	Rachel Steyer	0.2	\$750	\$150	email to court reporter providing exhibits	Depositions
7/15/2021	Travis Close	1.3	\$850	\$1,105	Analyze undefined terms & acronyms in Emergency Manual for expert	Case Organization, Planning and Strategy
7/15/2021	Travis Close	0.6	\$850	\$510	Call with June Kailes re: working through issues in emergency evacuation plan & supplemental plans; outline for moving forward	Experts (Including Retention)
7/16/2021	Guy Wallace	1.1	\$1,350	\$1,485	tc with GG; BBK; JY; AX; EH; MTJ; TCC; RLS re class member declarations; Waters and Mastin Declarations; Cross and Kailes Declarations; deposition preparation and analysis; draft brief	Class Certification
7/16/2021	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ; RLS re preparation of class member declarations	Class Certification
7/16/2021	Guy Wallace	0.4	\$1,350	\$540	com's with GG; MTJ re media strategy	Class Certification
7/16/2021	Guy Wallace	0.7	\$1,350	\$945	preparation and drafting of SOF for class cert brief	Class Certification
7/16/2021	Guy Wallace	1.2	\$1,350	\$1,620	tc with Marks; JT; MTJ re testimony of Bowman; Flynt; Rubin re Brookdale staffing policies and procedures; benchmarks; staffing analysis	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/16/2021	Guy Wallace	0.7	\$1,350	\$945	prepare for and participate in document review and analysis to re further projects for class certification with AX; MTJ; TCC; RAB; JMP; CXC; EAO re same	Discovery (Non-Deposition)
7/16/2021	Guy Wallace	0.6	\$1,350	\$810	com's with Kailes; TCC; JMP re transportation contract; fire drill reports	Experts (Including Retention)
7/16/2021	Guy Wallace	0.4	\$1,350	\$540	com's with Waters; Mastin re preparation of facility reports	Experts (Including Retention)
7/16/2021	Rachel Steyer	1.2	\$750	\$900	weekly meeting with SWCK and RBGG co counsel to review and discuss ongoing assignments in preparation for class certification	Case Organization, Planning and Strategy
7/16/2021	Rachel Steyer	0.3	\$750	\$225	editing NRD draft declaration	Class Certification
7/16/2021	Rachel Steyer	0.2	\$750	\$150	phone call with GBW to discuss declarations	Class Certification
7/16/2021	Rachel Steyer	0.2	\$750	\$150	phone call with NCN to discuss status of drafts	Class Certification
7/16/2021	Rachel Steyer	3.1	\$750	\$2,325	reviewing partially drafted intakes and outstanding declarations for additional leads	Class Certification
7/16/2021	Rachel Steyer	0.2	\$750	\$150	phone call with NRD to review declaration status	Class Outreach and Contact
7/16/2021	Rachel Steyer	0.2	\$750	\$150	email to BCR re outreach and intake	Class Outreach and Contact
7/16/2021	Rachel Steyer	0.4	\$750	\$300	assigning additional contacts in sharepoint to TPC	Class Outreach and Contact
7/16/2021	Rachel Steyer	0.2	\$750	\$150	communications internally with TRB, BCR, NCN, NRD, RAG re ongoing assignments	Class Outreach and Contact
7/16/2021	Travis Close	1.3	\$850	\$1,105	Weekly doc review & team meeting discussing: depositions and depo transcript organization; training materials, pendant data, class member depositions, and expert reports	Case Organization, Planning and Strategy
7/16/2021	Travis Close	0.2	\$850	\$170	Email to JMP re: emergency evac drills examples needed	Case Organization, Planning and Strategy
7/16/2021	Travis Close	0.1	\$850	\$85	Email to opposing counsel re: section of joint letter brief needed	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/16/2021	Travis Close	0.5	\$850	\$425	Research/analyze where to find spreadsheets showing info on amounts paid by class members for damages experts	Experts (Including Retention)
7/17/2021	Guy Wallace	2.8	\$1,350	\$3,780	review and analysis of draft class member and class representative declarations; revise and edit same	Class Certification
7/17/2021	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ; RLS re class member declarations; depo re training for ee's; review and analysis of expert facility reports	Class Certification
7/17/2021	Guy Wallace	1.5	\$1,350	\$2,025	preparation and drafting of class cert brief; statement of facts	Class Certification
7/17/2021	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of Waters draft facility reports	Experts (Including Retention)
7/17/2021	Rachel Steyer	0.2	\$750	\$150	double checking declaration before sending to GBW and MTJ for review	Class Certification
7/17/2021	Rachel Steyer	0.8	\$750	\$600	email to MTJ and GBW with update about status of declarations	Class Certification
7/18/2021	Guy Wallace	2.8	\$1,350	\$3,780	revise and edit class member and class representative declarations re MCC; com's with EH; RLS re same	Class Certification
7/18/2021	Guy Wallace	2.6	\$1,350	\$3,510	preparation and drafting of SOF re motion for class cert	Class Certification
7/18/2021	Guy Wallace	0.6	\$1,350	\$810	review and analysis of draft depo outline re Rule 30(b)(6) topic 12 --training; com's with MTJ re same	Depositions
7/18/2021	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of draft facility reports from Waters and Mastin; com's with MTJ re same	Experts (Including Retention)
7/18/2021	Mark Johnson	1.2	\$1,150	\$1,380	calls x4 w/ GBW re class declarations, expert reports, topic 12 depo re training and exhibits for same	Class Certification
7/18/2021	Mark Johnson	3.0	\$1,150	\$3,450	review and enter comments on JM Brookhurst access report	Class Certification
7/18/2021	Mark Johnson	2.7	\$1,150	\$3,105	review and begin to revise draft outline for 30b6 topic 12 depo; review exhibits for same.	Depositions
7/18/2021	Rachel Steyer	0.8	\$750	\$600	editing and revising NCN declarations	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/18/2021	Rachel Steyer	0.5	\$750	\$375	reviewing RAG intakes, comments for follow up, assessing for declarations	Class Outreach and Contact
7/18/2021	Rachel Steyer	0.4	\$750	\$300	email to RAG, RVR, BCR, NRD, NCN, TCP, TRB re outreach assignments	Class Outreach and Contact
7/19/2021	Guy Wallace	5.3	\$1,350	\$7,155	preparation and drafting of statement of facts; class cert brief	Class Certification
7/19/2021	Guy Wallace	0.3	\$1,350	\$405	com's with RLS re draft declarations of putative class members	Class Certification
7/19/2021	Guy Wallace	1.1	\$1,350	\$1,485	preparation of topics, questions and exhibits for topic 12 training depo; com's with MTJ; RAB re same	Depositions
7/19/2021	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ; RAB; CC re materials for topic 12 deposition re training materials and service alignment training modules	Depositions
7/19/2021	Guy Wallace	0.7	\$1,350	\$945	review and analysis of construction history of facilities inspected by P's experts	Discovery (Non-Deposition)
7/19/2021	Guy Wallace	0.4	\$1,350	\$540	com's with Waters re draft facility reports	Experts (Including Retention)
7/19/2021	Guy Wallace	0.6	\$1,350	\$810	review and analysis of preliminary findings from Kailes re emergency evacuation issues	Experts (Including Retention)
7/19/2021	Mark Johnson	0.4	\$1,150	\$460	call w/ TCC (.3) re researching ownership issue; review revised chart of facilities re same	Class Certification
7/19/2021	Mark Johnson	1.0	\$1,150	\$1,150	calls w/ GBW (x6) re training depo, search for specific exhibits, record time on depositions, status of outline of brief	Class Certification
7/19/2021	Mark Johnson	0.7	\$1,150	\$805	coms w/ RAB and other staff re search for exhibits for training depo; depo transcripts, depo exhibit list	Class Certification
7/19/2021	Mark Johnson	6.3	\$1,150	\$7,245	review docs and prep for 30b6 topic 5 depo	Depositions
7/19/2021	Mark Johnson	0.2	\$1,150	\$230	review ltr from OC and com w/ RAB re depo time.	Depositions
7/19/2021	Rachel Steyer	0.4	\$750	\$300	reviewing NCN draft declarations	Class Certification
7/19/2021	Rachel Steyer	0.3	\$750	\$225	reviewing NRD draft declaration	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/19/2021	Rachel Steyer	0.6	\$750	\$450	re-reviewed and conducted another read through call with declarant	Class Certification
7/19/2021	Rachel Steyer	0.2	\$750	\$150	email to GBW and MTJ with declaration for reivew and approval	Class Certification
7/19/2021	Rachel Steyer	0.3	\$750	\$225	editing NCN draft declaration	Class Certification
7/19/2021	Rachel Steyer	0.4	\$750	\$300	phone call with declarant to review changes before resending for signature	Class Certification
7/19/2021	Rachel Steyer	0.2	\$750	\$150	one mor efollow up question with declarant, prepared and resent for signature	Class Certification
7/19/2021	Rachel Steyer	0.2	\$750	\$150	email to class member delcarant with quesiton about declaration, trying to set up time to conduct final read through	Class Certification
7/19/2021	Rachel Steyer	0.2	\$750	\$150	editing NRD draft declaration	Class Certification
7/19/2021	Rachel Steyer	0.5	\$750	\$375	phone call with declarant to review and finalize declaration	Class Certification
7/19/2021	Rachel Steyer	0.2	\$750	\$150	additional phone call with class member to review further questions for declaration	Class Certification
7/19/2021	Rachel Steyer	1.0	\$750	\$750	call with class member declarant to review outstanding questions, updating declaration before sending for signature	Class Certification
7/19/2021	Rachel Steyer	0.4	\$750	\$300	editing NCN draft declaration	Class Certification
7/19/2021	Rachel Steyer	0.2	\$750	\$150	drafting class member declaration	Class Certification
7/19/2021	Rachel Steyer	0.5	\$750	\$375	communications on teams with NCN, NRD, TPC, RAG, TRB, BCR re outreach and assignments	Class Certification
7/19/2021	Rachel Steyer	1.0	\$750	\$750	editing and revising class member declaration following read through call with declarant, checking to review and incorporate GBW and MTJ previous edits	Class Certification
7/19/2021	Rachel Steyer	0.4	\$750	\$300	editing class member declaration and finalizing before sending to GBW and MTJ for review	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/19/2021	Rachel Steyer	0.5	\$750	\$375	editing and revising class member declaration before resending to GBW and MTJ for reiew	Class Certification
7/19/2021	Rachel Steyer	0.2	\$750	\$150	email to GBW and MTJ with draft declarations and explanation	Class Certification
7/19/2021	Rachel Steyer	0.5	\$750	\$375	reviewing and updating assignments in sharepoint	Class Outreach and Contact
7/19/2021	Rachel Steyer	0.2	\$750	\$150	email to RAG with feedback re intakes	Class Outreach and Contact
7/19/2021	Rachel Steyer	0.3	\$750	\$225	reviewing RAG intake, providing feedback	Class Outreach and Contact
7/19/2021	Rachel Steyer	0.3	\$750	\$225	providing new assignments in outreach	Class Outreach and Contact
7/19/2021	Rachel Steyer	0.5	\$750	\$375	reviewing RAG intakes, providing feedback	Class Outreach and Contact
7/19/2021	Rachel Steyer	0.4	\$750	\$300	reviewing TPC compelted intake, providing comments and feedback	Class Outreach and Contact
7/19/2021	Travis Close	0.3	\$850	\$255	Email to LEC re: transcripts for Kevin Bowman depo	Depositions
7/19/2021	Travis Close	0.8	\$850	\$680	Review/analyze latest transcripts of Kevin Bowman for info re: service alignment testimony	Depositions
7/19/2021	Travis Close	1.6	\$850	\$1,360	Revise spreadsheet (30(b)(6) topic 3) showing entity licensee info for facilities to include entities listed on 2020 10-k ex.21	Discovery (Non-Deposition)
7/19/2021	Travis Close	0.3	\$850	\$255	Call with MTJ re: assignment involving revising topic 3 chart	Discovery (Non-Deposition)
7/19/2021	Travis Close	0.6	\$850	\$510	Review and analyze notes/outline by JK (emergency evac expert) in prep for call tomorrow	Experts (Including Retention)
7/20/2021	Guy Wallace	3.6	\$1,350	\$4,860	preparation and drafting of motion for class certification; introduction and SOF	Class Certification
7/20/2021	Guy Wallace	0.8	\$1,350	\$1,080	revise and edit draft declarations of putative class members; com's with MTJ; RLS re same	Class Certification
7/20/2021	Guy Wallace	0.9	\$1,350	\$1,215	com's with Waters re draft facility reports; statement of facts for class cert brief	Experts (Including Retention)
7/20/2021	Guy Wallace	0.6	\$1,350	\$810	review and analysis of D's draft opposition to MTC re Rubin; com's with MTJ re same	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/20/2021	Mark Johnson	4.5	\$1,150	\$5,175	review and edit multiple class declaratoins and coms w/ RLS, GBW re same	Class Certification
7/20/2021	Mark Johnson	0.5	\$1,150	\$575	coms w/ D Marks x3 re info needed for simulation (room numbers, MC configuration, etc.) and coms w/ staff re same	Class Certification
7/20/2021	Mark Johnson	5.8	\$1,150	\$6,670	prep for topic 12 depo, including review of potential exhibits, revisions to outline and coms w/ staff re searches for relevant docs for exhibits.	Depositions
7/20/2021	Rachel Steyer	0.5	\$750	\$375	read through and reviewing declaration with declarant	Class Certification
7/20/2021	Rachel Steyer	0.3	\$750	\$225	phone call with declarant to review declaration, set up follow up review call	Class Certification
7/20/2021	Rachel Steyer	0.3	\$750	\$225	editing NCN draft declaration	Class Certification
7/20/2021	Rachel Steyer	0.3	\$750	\$225	editing NRD draft declaration	Class Certification
7/20/2021	Rachel Steyer	0.3	\$750	\$225	incorporating and reviewing GBW and MTJ comments to draft declaration	Class Certification
7/20/2021	Rachel Steyer	0.2	\$750	\$150	reviewing and incorporating GBW and MTJ edits into class member declaration	Class Certification
7/20/2021	Rachel Steyer	0.7	\$750	\$525	phone call with declarant to review and finalize declaration	Class Certification
7/20/2021	Rachel Steyer	0.6	\$750	\$450	reviewing and editing draft decalration following read through call with declarant and incorporating and double checking before sending to GBW and MTJ for review	Class Certification
7/20/2021	Rachel Steyer	0.3	\$750	\$225	editing and revising class member declaration before submitting to GBW and MTJ for review	Class Certification
7/20/2021	Rachel Steyer	0.3	\$750	\$225	editing NRD draft declaration	Class Certification
7/20/2021	Rachel Steyer	0.3	\$750	\$225	editing and updating draft before sending to class member declarant for review	Class Certification
7/20/2021	Rachel Steyer	0.2	\$750	\$150	response to MTJ and GBW regarding dates in declaration	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/20/2021	Rachel Steyer	0.8	\$750	\$600	final read through with declarant	Class Certification
7/20/2021	Rachel Steyer	0.4	\$750	\$300	follow up phone call with class member declarant to review portion in declaration	Class Certification
7/20/2021	Rachel Steyer	0.2	\$750	\$150	last minute revisions to class member declaration, sending for signature	Class Certification
7/20/2021	Rachel Steyer	0.3	\$750	\$225	updating and revising NRD class member declaration	Class Certification
7/20/2021	Rachel Steyer	0.2	\$750	\$150	email to NRD with comments and questions about draft declaration	Class Certification
7/20/2021	Rachel Steyer	0.2	\$750	\$150	reviewing and editing NCN draft declaration	Class Certification
7/20/2021	Rachel Steyer	0.6	\$750	\$450	re-editing and reviewing NCN draft declarations before submitting to GBW and MTJ for final review	Class Certification
7/20/2021	Rachel Steyer	0.2	\$750	\$150	adding additonal context to class member declaratoiin before resending to MTJ and GBW	Class Certification
7/20/2021	Rachel Steyer	0.2	\$750	\$150	editing and reivewing GBW and MTJ edits and incorporating into NCN drafts/updating accordingly	Class Certification
7/20/2021	Rachel Steyer	0.2	\$750	\$150	reviewing RAG intake, providing feedback and comments	Class Outreach and Contact
7/20/2021	Rachel Steyer	0.3	\$750	\$225	re-reviewing TPC intake with updates and edits	Class Outreach and Contact
7/20/2021	Rachel Steyer	0.2	\$750	\$150	email to TPC with feedback and comments on intake	Class Outreach and Contact
7/20/2021	Rachel Steyer	0.2	\$750	\$150	communications on teams with NCN, RAG, RVR, BCR, TCP, TRB about ongoing outreach assignments	Class Outreach and Contact
7/20/2021	Travis Close	0.7	\$850	\$595	Review sample of pendant data in prep for call with AXU & experts	Case Organization, Planning and Strategy
7/20/2021	Travis Close	1.3	\$850	\$1,105	Analyze Billing Detail by Revenue reports to determine where memory care units were located for Mirage Inn and Brookhurst facilities	Case Organization, Planning and Strategy
7/20/2021	Travis Close	0.3	\$850	\$255	Email to MTJ, staffing experts re: memory care units at Brookhurst/Mirage inn facilities	Case Organization, Planning and Strategy
7/20/2021	Travis Close	0.2	\$850	\$170	Email to MJ (Defendants) re: receiving Def's section of joint letter brief	Communications With Opposing Counsel

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/20/2021	Travis Close	0.5	\$850	\$425	Review and analyze correspondence from Defs re: depo time used and remaining for 30(b)(6); compare to transcript records	Depositions
7/20/2021	Travis Close	0.8	\$850	\$680	Analyzes 30(b)(6) testimony by Kevin Bowman re: pendant data at facilities	Depositions
7/20/2021	Travis Close	0.2	\$850	\$170	Email to GBW re today's meeting with emergency evac expert	Experts (Including Retention)
7/20/2021	Travis Close	1.1	\$850	\$935	Call with June Kailes (emergency evac expert) re: going over notes, working through questions for draft declaration	Experts (Including Retention)
7/20/2021	Travis Close	1.3	\$850	\$1,105	Begin drafting outline of emergency evac report based on notes from JK (expert)	Experts (Including Retention)
7/21/2021	Guy Wallace	1.3	\$1,350	\$1,755	preparation and drafting of introduction to class cert brief	Class Certification
7/21/2021	Guy Wallace	1.8	\$1,350	\$2,430	preparation and drafting of class cert brief; statement of facts	Class Certification
7/21/2021	Guy Wallace	1.2	\$1,350	\$1,620	review and analysis of training materials; preparation for topic 12 training depo	Depositions
7/21/2021	Guy Wallace	3.3	\$1,350	\$4,455	review and analysis of exhibits for topic 12 depo re training; preparation of questions re same; com's with MTJ re same (.4)	Depositions
7/21/2021	Mark Johnson	1.5	\$1,150	\$1,725	review and propose edits for class decs.	Class Certification
7/21/2021	Mark Johnson	8.7	\$1,150	\$10,005	prep for topic 12 training depo under Rule 30b6, including coms w/ GBW and staff re questions and docs; revise outline, locate and review potential exhibits.	Depositions
7/21/2021	Rachel Steyer	0.3	\$750	\$225	editing NCN draft declaration	Class Certification
7/21/2021	Rachel Steyer	0.3	\$750	\$225	editing and reviewing NRD draft declaration	Class Certification
7/21/2021	Rachel Steyer	0.2	\$750	\$150	finalizing class member declaration, preparing and sending for signature	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/21/2021	Rachel Steyer	0.3	\$750	\$225	editing and reviewing NRD draft declaration	Class Certification
7/21/2021	Rachel Steyer	0.2	\$750	\$150	editing NCN draft declaration	Class Certification
7/21/2021	Rachel Steyer	0.4	\$750	\$300	editing and revising NRD draft declaration	Class Certification
7/21/2021	Rachel Steyer	0.3	\$750	\$225	editing and revising class member declaration	Class Certification
7/21/2021	Rachel Steyer	0.3	\$750	\$225	editing and revising class member declaration	Class Certification
7/21/2021	Rachel Steyer	0.3	\$750	\$225	editing and revising class member declaration	Class Certification
7/21/2021	Rachel Steyer	0.4	\$750	\$300	editing class member declaration	Class Certification
7/21/2021	Rachel Steyer	0.5	\$750	\$375	reformatting declarations and resending to GBW and MTJ	Class Certification
7/21/2021	Rachel Steyer	0.2	\$750	\$150	edinting and updating class member declaration for GBW and MTJ	Class Certification
7/21/2021	Rachel Steyer	0.2	\$750	\$150	call with NCN to discuss status of draft declarations	Class Certification
7/21/2021	Rachel Steyer	0.3	\$750	\$225	editing and revising class member declaration	Class Certification
7/21/2021	Rachel Steyer	0.2	\$750	\$150	editing and revising class member declaration before sending to GBW and MTJ for finalizing	Class Certification
7/21/2021	Rachel Steyer	0.6	\$750	\$450	reassigning contacts in sharepoint for outreach	Class Outreach and Contact
7/21/2021	Rachel Steyer	0.3	\$750	\$225	reviewing RVR intakes, providing feedback	Class Outreach and Contact
7/21/2021	Rachel Steyer	0.3	\$750	\$225	call with TPC to go over questions in intake he compelted	Class Outreach and Contact
7/21/2021	Rachel Steyer	0.2	\$750	\$150	reviewing intake completed by TPC	Class Outreach and Contact
7/21/2021	Rachel Steyer	0.4	\$750	\$300	communciations w/in firm on teams with NRD, NCN, RVR, TPC, RAG, BCR re ongoing outreach assignments	Class Outreach and Contact
7/21/2021	Travis Close	1.3	\$850	\$1,105	Analyze sufficiency of production of Billing Detail by Revenue reports for our staffing experts	Case Organization, Planning and Strategy
7/21/2021	Travis Close	0.2	\$850	\$170	Meet w/ MTJ re: docs needed to complete staffing analysis	Case Organization, Planning and Strategy
7/21/2021	Travis Close	0.2	\$850	\$170	Email to RAB re: billing detail by revenue reports for staffing analysis	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/21/2021	Travis Close	0.3	\$850	\$255	Call with staffing expert (DM) re: spreadsheets needed to finish sample analysis	Case Organization, Planning and Strategy
7/21/2021	Travis Close	0.2	\$850	\$170	Email to RAB re: confirmation to retrieve useful reports for experts	Case Organization, Planning and Strategy
7/21/2021	Travis Close	0.2	\$850	\$170	Email to DM, JT (experts) re: reports for calculating memory care units at sample facilities	Case Organization, Planning and Strategy
7/21/2021	Travis Close	0.9	\$850	\$765	Create & organize index of billing detail by revenue reports for sharing with experts	Case Organization, Planning and Strategy
7/21/2021	Travis Close	0.7	\$850	\$595	Review/analyze prior Kelly Rubin depo testimony re: workings of service alignment system	Depositions
7/21/2021	Travis Close	0.2	\$850	\$170	Email to DM (staffing expert) re: docs needed to complete analysis	Experts (Including Retention)
7/22/2021	Guy Wallace	1.3	\$1,350	\$1,755	revise and edit draft class member declarations	Class Certification
7/22/2021	Guy Wallace	5.6	\$1,350	\$7,560	preparation and drafting of class cert brief; statement of facts; com's with MTJ re same (.7)	Class Certification
7/22/2021	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ re preparation for topic 12 depo re training	Depositions
7/22/2021	Guy Wallace	0.4	\$1,350	\$540	com's with Waters re draft facility reports	Experts (Including Retention)
7/22/2021	Mark Johnson	1.2	\$1,150	\$1,380	review and proposed edits for class declarations	Class Certification
7/22/2021	Mark Johnson	10.7	\$1,150	\$12,305	prep for 30b6 topic 12 training depo - review docs, draft outline	Depositions
7/22/2021	Rachel Steyer	0.2	\$750	\$150	editing and reviewing NRD draft declaration	Class Certification
7/22/2021	Rachel Steyer	0.2	\$750	\$150	updating declaration based on declarant's clarifications and resending for signature	Class Certification
7/22/2021	Rachel Steyer	1.0	\$750	\$750	updating declarations based on feedback and edits from GBW and MTJ, updating sharepoint	Class Certification
7/22/2021	Rachel Steyer	0.2	\$750	\$150	reviewing and updating class member declaration	Class Certification
7/22/2021	Rachel Steyer	0.2	\$750	\$150	editing and updating NRD draft declaration	Class Certification
7/22/2021	Rachel Steyer	0.2	\$750	\$150	editing and revising class member declaration before sending to GBW and MTJ for final review	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/22/2021	Rachel Steyer	0.3	\$750	\$225	phone call w/class member declarant to review last minute quesiton in declaration, updating	Class Certification
7/22/2021	Rachel Steyer	0.2	\$750	\$150	re-reviewing and editing class member declaration	Class Certification
7/22/2021	Rachel Steyer	0.2	\$750	\$150	re-reviewing and updating class member declaration	Class Certification
7/22/2021	Rachel Steyer	0.2	\$750	\$150	editing and re-reviewing class member declaration	Class Certification
7/22/2021	Rachel Steyer	0.4	\$750	\$300	editing and re-reviewing declaration before submitting to MTJ and GBW for review	Class Certification
7/22/2021	Rachel Steyer	0.2	\$750	\$150	re-reviewing and editing class member declaration before submitting to GBW and MTJ	Class Certification
7/22/2021	Rachel Steyer	0.8	\$750	\$600	reviewing and updating status of declarations for GBW and MTJ	Class Certification
7/22/2021	Rachel Steyer	0.3	\$750	\$225	re-reviewing and editing clsas member declaration for GBW and MTJ	Class Certification
7/22/2021	Rachel Steyer	0.6	\$750	\$450	communications on teams with TRB, RVR, RAG, NCN, Class Outreach and Contact NRD, TCP concerning ongoing outreach assignments	
7/22/2021	Travis Close	1.2	\$850	\$1,020	Review and analyze emergency evacutations manual for info re: order of evacuation of residents with disabilities	Case Organization, Planning and Strategy
7/22/2021	Travis Close	0.9	\$850	\$765	Review accessible evacuation policies from Brookdale's emergency evacuation manual	Case Organization, Planning and Strategy
7/22/2021	Travis Close	0.7	\$850	\$595	Analyze procedures in evacuation manual for hotel lodging	Case Organization, Planning and Strategy
7/22/2021	Travis Close	0.5	\$850	\$425	Analyze procedures for inclusive events created by JK (expert)	Class Certification
7/22/2021	Travis Close	0.8	\$850	\$680	Review JK (expert) inclusive event procedures for info re: earthquake & other emergency evacuations, best practices	Class Certification
7/22/2021	Travis Close	1.4	\$850	\$1,190	Review & analyze policies for emergency preparednes on June Kailes' webstie for use in draft report	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/22/2021	Travis Close	1.2	\$850	\$1,020	Review examples of fire drills for info re: deficiencies found and steps taken to correct failures	Class Outreach and Contact
7/22/2021	Travis Close	0.7	\$850	\$595	Review/analyze transcript of Audrey Withers depo (Topic 12) for testimony re: training on emergency evacuation and transportation of residents	Depositions
7/23/2021	Guy Wallace	3.3	\$1,350	\$4,455	preparation and drafting of SOF for class cert brief	Class Certification
7/23/2021	Guy Wallace	0.7	\$1,350	\$945	prepare for and participate in team meeting re preparation of motion for class certification	Class Certification
7/23/2021	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ re topic 12 training depo	Depositions
7/23/2021	Guy Wallace	0.5	\$1,350	\$675	prepare for participate in ZOOM with AX; KES; TCC; RAB; JMP re document review and remaining analysis projects for class certification	Discovery (Non-Deposition)
7/23/2021	Mark Johnson	0.5	\$1,150	\$575	post-deposition call w/ GBW to debrief on 30b6 topic 12 re training	Class Certification
7/23/2021	Mark Johnson	0.2	\$1,150	\$230	talk w/ GBW re outcome of team meeting.	Class Certification
7/23/2021	Mark Johnson	4.5	\$1,150	\$5,175	deposition on topic 12 of 30b6 depo - Audrey Withers, including review of notice and docs during breacks and tech troubleshooting.	Depositions
7/23/2021	Mark Johnson	1.5	\$1,150	\$1,725	prep for 30b6 topic 12 depo on training, including finalizing pool of exhibits and revisions to outline before depo	Depositions
7/23/2021	Rachel Steyer	0.2	\$750	\$150	editing and revising NRD class member declaration	Class Certification
7/23/2021	Rachel Steyer	0.4	\$750	\$300	conducted read through of declaration with class member declarant	Class Certification
7/23/2021	Rachel Steyer	0.3	\$750	\$225	reviewing and editing NRD draft declaration	Class Certification
7/23/2021	Rachel Steyer	0.3	\$750	\$225	editing and revising NCN draft declaration	Class Certification
7/23/2021	Rachel Steyer	1.0	\$750	\$750	completed outreach call with class member	Class Outreach and Contact
7/23/2021	Rachel Steyer	0.2	\$750	\$150	communications on teams with NRD, NCN, RAG, BCR re ongoing outreach assignments	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/23/2021	Rachel Steyer	4.0	\$750	\$3,000	attended 30b6 topic 12 depo and assisted MTJ with organizing and presenting exhibits	Depositions
7/23/2021	Travis Close	0.7	\$850	\$595	Team meeting w/ RBGG (co-counsel) , GBW, RAB re: strategy for class cert filings; class member declarations; and expert declarations	Class Certification
7/23/2021	Travis Close	0.8	\$850	\$680	Review and analyze draft class cert brief by GBW	Class Certification
7/23/2021	Travis Close	1.3	\$850	\$1,105	Review and analyze class member declarations for testimony re: emergency evacuation issues	Class Outreach and Contact
7/23/2021	Travis Close	0.2	\$850	\$170	Analyze status of claims for class member Christine Jones	Class Outreach and Contact
7/23/2021	Travis Close	0.5	\$850	\$425	Doc review meeting w/ GBW, AXU, staff attorneys re: progress on depo prep and research	Depositions
7/23/2021	Travis Close	0.3	\$850	\$255	Meet with MTJ re: debrief from deposition	Depositions
7/24/2021	Guy Wallace	1.8	\$1,350	\$2,430	preparation and drafting of motion for class certification, legal argument	Class Certification
7/25/2021	Guy Wallace	4.1	\$1,350	\$5,535	preparation and drafting of MCC; legal argument re propriety of class treatment	Class Certification
7/25/2021	Guy Wallace	1.9	\$1,350	\$2,565	legal research and analysis re class #2 and definition of disability; new construction and alterations claims and class cert decisions re same; emergency evacuation; class certification decisions by Judge Gilliam; com's with MTJ re same (.3)	Class Certification
7/25/2021	Guy Wallace	2.1	\$1,350	\$2,835	legal research and analysis re readily achievable barrier removal; class cert decisions re same	Class Certification
7/26/2021	Guy Wallace	2.6	\$1,350	\$3,510	preparation and drafting of class cert brief; common questions re ADA class	Class Certification
7/26/2021	Guy Wallace	0.6	\$1,350	\$810	legal research and analysis re nondiscrimination requirements under Title III, including equal access to services	Class Certification
7/26/2021	Guy Wallace	0.6	\$1,350	\$810	revise and edit draft class member declarations	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/26/2021	Guy Wallace	1.1	\$1,350	\$1,485	com's with Marks; Thornton; MTJ re staffing analysis and Flores Declaration	Class Certification
7/26/2021	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re MTC re notices of corrective action; staffing analysis and requests for documents re same	Discovery (Non-Deposition)
7/26/2021	Guy Wallace	0.7	\$1,350	\$945	com's with Waters re draft facility reports	Experts (Including Retention)
7/26/2021	Guy Wallace	3.5	\$1,350	\$4,725	review and analysis of draft facility reports; preparation of memo for team re same	Experts (Including Retention)
7/26/2021	Mark Johnson	1.6	\$1,150	\$1,840	review and suggest edits to class decs	Class Certification
7/26/2021	Mark Johnson	1.5	\$1,150	\$1,725	GTM call w/ Thornton, Marks, GBW re staffing analysis, data, depo testimony	Class Certification
7/26/2021	Rachel Steyer	0.6	\$750	\$450	phone call with class member declarant to reivew contents of declaration	Class Certification
7/26/2021	Rachel Steyer	0.8	\$750	\$600	phone call with class member declarant to review and update declaration	Class Certification
7/26/2021	Rachel Steyer	0.5	\$750	\$375	reviewing declarations and incorporating MTJ edits	Class Certification
7/26/2021	Rachel Steyer	0.4	\$750	\$300	editing and revising class member declaration before resending to GBW and MTJ for review	Class Certification
7/26/2021	Rachel Steyer	0.6	\$750	\$450	editing and updating class member declaration following call with class member, reviewing before resending to GBW and MTJ	Class Certification
7/26/2021	Rachel Steyer	0.4	\$750	\$300	reviewing and updating status of declarations form for GBW and MTJ	Class Certification
7/26/2021	Rachel Steyer	0.5	\$750	\$375	ewviewing draft access experts reports with GBW and MTJ comments and edits	Class Certification
7/26/2021	Rachel Steyer	0.2	\$750	\$150	editing NCN draft declaration	Class Certification
7/26/2021	Rachel Steyer	0.4	\$750	\$300	communications on teams with NCN, TPC, RAG, NRD re ongoing outreach assignments and declaration	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/26/2021	Travis Close	1.4	\$850	\$1,190	Review/analyze construction records for Brookhurst and Magnolia Court facilities to determine constrution dates	Case Organization, Planning and Strategy
7/26/2021	Travis Close	0.5	\$850	\$425	Review/analyze presentation on 2018 Budget shared by Cindy Bair to reigional leadership	Class Certification
7/26/2021	Travis Close	1.2	\$850	\$1,020	Continue drafting outline of June Kailes dec iso class cert (staffing requirements for emergencies)	Class Certification
7/26/2021	Travis Close	1.3	\$850	\$1,105	Continue drafting outline of June Kailes dec iso class cert (evacuating people with disabilities)	Class Certification
7/26/2021	Travis Close	0.7	\$850	\$595	Analyze transcript of 30(b)(6) topic 12 deposition for testimony re: training of brookdale employees on emergency evacuation and accessible transportation	Depositions
7/26/2021	Travis Close	0.5	\$850	\$425	Review & analyze updated DSS facility report & complaint investigation report info for Avista Senior Living Magnolia (formerly Brookdale Magnolia)	Discovery (Non-Deposition)
7/26/2021	Travis Close	0.3	\$850	\$255	Review/analyze draft joint letter brief re: motion to compel corrective actions and action plans	Discovery (Non-Deposition)
7/26/2021	Travis Close	0.6	\$850	\$510	Review and analyze best practices by JK (expert) re: locating accessible exits and finding safe areas	Experts (Including Retention)
7/27/2021	Guy Wallace	0.7	\$1,350	\$945	legal research and analysis re nondiscrimination duty and duty to provide equal access to benefits and advantages of services; Title III regulations and Technical Assistance Manual	Class Certification
7/27/2021	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re potential motions to compel; notices of corrective action and plans; non-produced assessment data; alleged maintenance manual	Class Certification
7/27/2021	Guy Wallace	1.6	\$1,350	\$2,160	prepare for and participate in team ZOOM re class cert brief; draft facility reports; class member declarations; potential motions to compel; staffing analysis	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/27/2021	Guy Wallace	0.4	\$1,350	\$540	analysis of content of Kailes declaration re class cert; com's with TCC re same	Class Certification
7/27/2021	Mark Johnson	0.6	\$1,150	\$690	calls (x2) w/ GBW re planning for team mtg; call w/ press, motions to compel corrective action plans and supp data	Class Certification
7/27/2021	Mark Johnson	1.6	\$1,150	\$1,840	prep for and participate in team mtg re allocation of work on brief, motions to compel, review of draft facility reports and class member declarations	Class Certification
7/27/2021	Mark Johnson	2.5	\$1,150	\$2,875	review and comment on class declarations; coms w/ RLS re same	Class Certification
7/27/2021	Mark Johnson	1.5	\$1,150	\$1,725	review and edit depo exhibit list and select depo exhibits for reconcillation and identification of exhibits for class cert	Class Certification
7/27/2021	Mark Johnson	1.3	\$1,150	\$1,495	review and edit draft statement of facts; review GBW guidelines for review of expert access reports	Class Certification
7/27/2021	Mark Johnson	0.3	\$1,150	\$345	revise list of expert access reports and status; make assignments re review of same, email w/ COC re same	Class Certification
7/27/2021	Rachel Steyer	1.6	\$750	\$1,200	internal strategy meeting with MTJ, GBW, TCC and co-counsel to review outstanding assignments in preparation for filing motion	Case Organization, Planning and Strategy
7/27/2021	Rachel Steyer	0.4	\$750	\$300	conducted read through call with class member declarant	Class Certification
7/27/2021	Rachel Steyer	0.2	\$750	\$150	reviewing and incorporating GBW and MTJ edits, preparing and sending for signature	Class Certification
7/27/2021	Rachel Steyer	0.3	\$750	\$225	conducted read throuhg call with class member declarant	Class Certification
7/27/2021	Rachel Steyer	0.7	\$750	\$525	phone call with class member declarant to review and finalize declaration	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/27/2021	Rachel Steyer	0.5	\$750	\$375	phone call with class member declarant, reviewed follow up questions, set up time for read through	Class Certification
7/27/2021	Rachel Steyer	0.2	\$750	\$150	reviewing and editing NCN draft declaration	Class Certification
7/27/2021	Rachel Steyer	0.2	\$750	\$150	reviewing likely class member declarant documents	Class Certification
7/27/2021	Rachel Steyer	0.2	\$750	\$150	editing and reviewing NRD draft declaration	Class Certification
7/27/2021	Rachel Steyer	0.2	\$750	\$150	editing and incorporating MTJ edits into class member declaration	Class Certification
7/27/2021	Rachel Steyer	0.3	\$750	\$225	reviewing and editing class member declaration with MTJ edits, reviewing class member records	Class Certification
7/27/2021	Rachel Steyer	0.2	\$750	\$150	email to RBGG co-counsel re dividing up remaining outreach effort	Class Outreach and Contact
7/27/2021	Rachel Steyer	0.2	\$750	\$150	communications on teams with TRB, RAG, TCP, NCN, NRD re ongoing outreach assignments	Class Outreach and Contact
7/27/2021	Rachel Steyer	1.6	\$750	\$1,200	preparing chart for GBW with basic info concerning named plaintiffs	Misc. Research
7/27/2021	Travis Close	1.6	\$850	\$1,360	Team meeting re: class cert strategy; reviewing expert reports, and expert declarations	Case Organization, Planning and Strategy
7/27/2021	Travis Close	1.3	\$850	\$1,105	Analyze Brookdale's policies in emergency evac manual & policy binder re: accessible transportation, including wheelchairs and scooters	Class Certification
7/27/2021	Travis Close	0.3	\$850	\$255	Email to JK (expert) re: update on status of draft declaration	Class Certification
7/27/2021	Travis Close	0.6	\$850	\$510	Analyze contract with vendor Bus Finders to determine accessible transportation policies	Class Certification
7/27/2021	Travis Close	1.4	\$850	\$1,190	Continue drafting outline for JK dec iso class cert (deficient policies re: transport of residents with disabilities to shelter locations)	Class Certification
7/27/2021	Travis Close	0.9	\$850	\$765	Review GBW's and MTJ's comments on draft expert report reviews for necessary edits/corrections	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/28/2021	Guy Wallace	1.6	\$1,350	\$2,160	legal research and analysis re CLRA requirements and test; ADA cases re reasonable modifications in policy and procedure	Class Certification
7/28/2021	Guy Wallace	3.3	\$1,350	\$4,455	preparation and drafting of motion for class certification; ADA classes	Class Certification
7/28/2021	Guy Wallace	1.6	\$1,350	\$2,160	preparation of sections re predominance for false and misleading statements and omissions class; damages model	Class Certification
7/28/2021	Mark Johnson	2.7	\$1,150	\$3,105	research on scope of disability and individualized inquiry, disability definition.	Class Certification
7/28/2021	Mark Johnson	0.2	\$1,150	\$230	coms w/ EO re narratives on construction history	Class Certification
7/28/2021	Rachel Steyer	0.2	\$750	\$150	editing and reviewing MTJ edits to class member declaration	Class Certification
7/28/2021	Rachel Steyer	0.3	\$750	\$225	reviewing NCN draft declaration	Class Certification
7/28/2021	Rachel Steyer	0.3	\$750	\$225	editing and reviewing NCN draft declaration	Class Certification
7/28/2021	Rachel Steyer	0.3	\$750	\$225	email to GBW and MTJ with lingering questions about declarations	Class Certification
7/28/2021	Rachel Steyer	1.1	\$750	\$825	phone call with class member declarant to read through and review declaration	Class Certification
7/28/2021	Rachel Steyer	0.5	\$750	\$375	editing and drafting class member declaration following conversation with declarant	Class Certification
7/28/2021	Rachel Steyer	0.8	\$750	\$600	preparing email to GBW and MTJ summarizing specific questions in some remaining class member declarations	Class Certification
7/28/2021	Rachel Steyer	0.4	\$750	\$300	editing and reviewing NCN class member declaration	Class Certification
7/28/2021	Rachel Steyer	0.3	\$750	\$225	call with co-counsel to review status of uncontacted/unreached declarants	Class Outreach and Contact
7/28/2021	Rachel Steyer	0.7	\$750	\$525	communications with NCN, NRD, TCP, TRB on teams to discuss ongoing outreach assignments	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/28/2021	Rachel Steyer	0.2	\$750	\$150	reviewing co-counsel email with update of declaration statuses, checking sharepoint	Class Outreach and Contact
7/28/2021	Travis Close	0.5	\$850	\$425	Prep/organize for starting review of expert inspection reports of Brookdale facilities	Case Organization, Planning and Strategy
7/28/2021	Travis Close	0.6	\$850	\$510	Analyze prior Sacramento case (Cal. Found. for Indep. Living Ctrs. v. Cnty. of Sacramento) alleging faulty emergency evacuation plan in violation of ADA	Case Organization, Planning and Strategy
7/28/2021	Travis Close	0.4	\$850	\$340	Analyze docs found by JMP from audrey withers showing OT reduction required from BKD communities	Class Certification
7/28/2021	Travis Close	1.2	\$850	\$1,020	Continue drafting dec of June Kailes iso class cert (qualifications and scope of work)	Class Certification
7/28/2021	Travis Close	1.1	\$850	\$935	Continue drafting dec of June Kailes iso class cert (intro & deficiencies found)	Class Certification
7/28/2021	Travis Close	1.2	\$850	\$1,020	Research prior cases with expert June Kailes to pull declarations for template	Experts (Including Retention)
7/29/2021	Guy Wallace	1.1	\$1,350	\$1,485	legal research and analysis re recent class certification decisions re ADA access and policy-challenge cases	Class Certification
7/29/2021	Guy Wallace	3.7	\$1,350	\$4,995	preparation and drafting of motion for class certification; elder financial abuse claim; damages model	Class Certification
7/29/2021	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ re residents with disabilities class and composition of same	Class Certification
7/29/2021	Guy Wallace	1.7	\$1,350	\$2,295	preparation and drafting of outline of Waters / Mastin declarations; com's with MTJ re same (.2)	Class Certification
7/29/2021	Rachel Steyer	0.2	\$750	\$150	editing and reviewing NCN draft declaration	Class Certification
7/29/2021	Rachel Steyer	0.2	\$750	\$150	recieved call back from class member, scheduled read through call	Class Certification
7/29/2021	Rachel Steyer	0.5	\$750	\$375	condcuted read through call with declarant	Class Certification
7/29/2021	Rachel Steyer	0.3	\$750	\$225	reviewing and editng NRD draft declaration	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/29/2021	Rachel Steyer	0.4	\$750	\$300	conducted final read through with declarant	Class Certification
7/29/2021	Rachel Steyer	0.3	\$750	\$225	reviewing NRD declaration, preparing and sending for signature	Class Certification
7/29/2021	Rachel Steyer	0.4	\$750	\$300	follow up review call with declarant to make minor tweaks, resending	Class Certification
7/29/2021	Rachel Steyer	0.4	\$750	\$300	finalizing declaration following read through call, flagging last minute questions for GBW & MTJ	Class Certification
7/29/2021	Rachel Steyer	0.3	\$750	\$225	finalizing and making last minute changes to class member declaration before sending for signature	Class Certification
7/29/2021	Rachel Steyer	0.3	\$750	\$225	editing and finalizing class member declaration	Class Certification
7/29/2021	Rachel Steyer	0.2	\$750	\$150	email to GBW and MTJ with additional follow up questions	Class Certification
7/29/2021	Rachel Steyer	0.2	\$750	\$150	reviewing intake for possible declaration	Class Outreach and Contact
7/29/2021	Rachel Steyer	0.8	\$750	\$600	communications on teams with Brookdale outreach team (BCR, NRD, NCN, RAG, TCP, RVR, AXS) re ongoing assignments and answering questions	Class Outreach and Contact
7/29/2021	Rachel Steyer	0.2	\$750	\$150	reviewing and looking for declarant residency agreement	Discovery (Non-Deposition)
7/29/2021	Travis Close	0.6	\$850	\$510	Analyze accessible guidelines regarding clear floor or ground space for wheelchairs, including bathrooms and kitchens	Case Organization, Planning and Strategy
7/29/2021	Travis Close	1.8	\$850	\$1,530	Review of Tracy facility inspection report by GW for evidence issues, tolerance issues, abnormalities & grammar (barriers 1-89)	Class Certification
7/29/2021	Travis Close	1.4	\$850	\$1,190	Continue drafting dec of June Kailes iso class cert (advanced planning)	Class Certification
7/29/2021	Travis Close	1.6	\$850	\$1,360	Continue drafting dec of June Kailes iso class cert (evacuation from upper floors)	Class Certification
7/29/2021	Travis Close	0.3	\$850	\$255	Question to team re: access reports not including measurements in reports, but they're in photos	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/30/2021	Guy Wallace	1.2	\$1,350	\$1,620	preparation and drafting of class cert brief; D.'s manager discretion defense	Class Certification
7/30/2021	Guy Wallace	4.7	\$1,350	\$6,345	revise and edit initial draft of class certification brief	Class Certification
7/30/2021	Guy Wallace	0.8	\$1,350	\$1,080	team ZOOM meeting re brief; expert facility reports; class representative and class member declarations; staffing analysis	Class Certification
7/30/2021	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ re revisions to SOF re class cert brief; response to Bowman's perjurious testimony	Class Certification
7/30/2021	Guy Wallace	0.5	\$1,350	\$675	preparation of tasks re expert declarations; putative class member declarations; com's with GG; JY; TCC; RLS re same	Class Certification
7/30/2021	Guy Wallace	0.2	\$1,350	\$270	com's with Waters re preparation of facility reports	Experts (Including Retention)
7/30/2021	Guy Wallace	0.6	\$1,350	\$810	review and analysis of Mastin draft facility reports	Experts (Including Retention)
7/30/2021	Mark Johnson	0.9	\$1,150	\$1,035	team meeting on status of tasks for class cert brief and related items.	Class Certification
7/30/2021	Mark Johnson	0.2	\$1,150	\$230	call w GBW re edits to class cert brief, citations to evidence.	Class Certification
7/30/2021	Mark Johnson	0.9	\$1,150	\$1,035	team mtg re status of work on class cert filings, identification and selection of exhibits / citations to evicence, expert reports, class declarations,	Class Certification
7/30/2021	Mark Johnson	0.6	\$1,150	\$690	calls w/ GBW re class cert brief, deposition testimony from 30b6 witness, strategy for addressing same; evidece supportiing statement of facts in brief.	Class Certification
7/30/2021	Mark Johnson	8.5	\$1,150	\$9,775	work on fact sections of biref iso class cert; review depos and documents for support of statements of fact.	Class Certification
7/30/2021	Rachel Steyer	0.7	\$750	\$525	weekly call with co-counsel and MTJ, GBW, TCC to discuss assignments in preparation for motion for class certification	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/30/2021	Rachel Steyer	1.2	\$750	\$900	conducted final read through call with class member declarant	Class Certification
7/30/2021	Rachel Steyer	0.3	\$750	\$225	editing NCN class member declaration	Class Certification
7/30/2021	Rachel Steyer	0.3	\$750	\$225	editing and revising RAG draft class member declaration	Class Certification
7/30/2021	Rachel Steyer	0.3	\$750	\$225	call with RAG to review residency agreement and discuss declaration drafting	Class Certification
7/30/2021	Rachel Steyer	0.3	\$750	\$225	editing NRD class member declaration	Class Certification
7/30/2021	Rachel Steyer	1.7	\$750	\$1,275	reading through GBW MPA class cert brief	Class Certification
7/30/2021	Rachel Steyer	0.2	\$750	\$150	email to GBW and MTJ with questions about declarations	Class Certification
7/30/2021	Rachel Steyer	0.6	\$750	\$450	communications with outreach team on ongoing assignments, answering questions	Class Outreach and Contact
7/30/2021	Rachel Steyer	0.5	\$750	\$375	reviewing and updating outreach assignments in sharepoint	Class Outreach and Contact
7/30/2021	Rachel Steyer	0.2	\$750	\$150	searching for class member residency agreements	Discovery (Non-Deposition)
7/30/2021	Rachel Steyer	0.2	\$750	\$150	reviewing for class mmeber residency agreement	Discovery (Non-Deposition)
7/30/2021	Rachel Steyer	0.2	\$750	\$150	searching records for class member declarant assessment info	Discovery (Non-Deposition)
7/30/2021	Travis Close	0.9	\$850	\$765	Weekly team meeting discussing class cert strategy, brief page limits, expert report review, expert declarations, class rep and class member declarations	Case Organization, Planning and Strategy
7/30/2021	Travis Close	1.3	\$850	\$1,105	Continue drafting dec of June Kailes iso class cert (accessible transport)	Case Organization, Planning and Strategy
7/30/2021	Travis Close	1.7	\$850	\$1,445	Continue reviewing Tracy facility inspection report by GW for evidence issues, tolerance issues, abnormalities & grammar (barriers 89-160)	Class Certification
7/30/2021	Travis Close	1.2	\$850	\$1,020	Review/analyze supplemental emergency evac plans for info re: accessible transportation	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/30/2021	Travis Close	1.4	\$850	\$1,190	Continue drafting dec of June Kailes iso class cert (missing info re: assembly points, relocation, and shelter locations)	Class Certification
7/30/2021	Travis Close	0.4	\$850	\$340	Finish reivewing/commenting/editing Tracy inspection report (barriers 160-199)	Class Certification
7/30/2021	Travis Close	0.3	\$850	\$255	Review and analyze updated list of depo exhibits + list of transcripts	Depositions
7/31/2021	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re revisions to class cert brief; SOF	Class Certification
7/31/2021	Guy Wallace	1.3	\$1,350	\$1,755	review and analysis of draft site inspections reports prepared by Mastin and JY comments re same	Experts (Including Retention)
7/31/2021	Mark Johnson	0.4	\$1,150	\$460	calls w/ GBW re edits to SOF section of class cert brief; evidentiary support for same.	Class Certification
7/31/2021	Mark Johnson	2.8	\$1,150	\$3,220	continue work on SOF section of class cert brief, location and review of supporting evidence.	Class Certification
7/31/2021	Mark Johnson	2.7	\$1,150	\$3,105	work on Mastin declaration iso class cert	Class Certification
8/1/2021	Guy Wallace	1.3	\$1,350	\$1,755	preparation and drafting of motion for class certification; legal research and analysis re recent cases re class certification under the ADA	Class Certification
8/1/2021	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of Declarations of Ralph Carlson; Joan Carlson; revise and edit same; com's with BBK re same	Class Certification
8/1/2021	Guy Wallace	0.8	\$1,350	\$1,080	revise and edit draft class member declarations; com's with RLS re same	Class Certification
8/1/2021	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re preparation of Waters; Mastin declarations ISO class certification	Class Certification
8/1/2021	Guy Wallace	1.7	\$1,350	\$2,295	review and analysis of draft declaration of Kailes; revise and edit same; com's with TCC re same	Class Certification
8/1/2021	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of draft facility reports; preparation of list of edits re same and com's with GG; JY; MTJ re same	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/1/2021	Guy Wallace	1.2	\$1,350	\$1,620	preparation and drafting of Waters declaration	Class Certification
8/1/2021	Guy Wallace	0.8	\$1,350	\$1,080	com's with GG; JY; MTJ re revisions to draft facility reports	Experts (Including Retention)
8/1/2021	Guy Wallace	0.4	\$1,350	\$540	com's with Waters; Mastin; GG; JY; MTJ; TCC re construction history of D's new facilities; analysis of same	Experts (Including Retention)
8/1/2021	Mark Johnson	0.5	\$1,150	\$575	review and analsis of new construcion nformation and coordinae with inspection list; prepare chart re same.	Class Certification
8/1/2021	Mark Johnson	6.7	\$1,150	\$7,705	work on Mastin declaration and collection of information for same.	Class Certification
8/1/2021	Mark Johnson	0.9	\$1,150	\$1,035	calls w/ GBW re expert reports, dimensional tolerances, Mastin declaration, new construction and alterations, successor liability	Class Certification
8/1/2021	Rachel Steyer	0.2	\$750	\$150	answering GBW question re visual impairment of current class members/residents	Class Certification
8/1/2021	Rachel Steyer	0.2	\$750	\$150	finalizing class member declaration, preparing and sending for signature	Class Certification
8/1/2021	Rachel Steyer	1.3	\$750	\$975	drafting class member declaration	Class Certification
8/2/2021	Guy Wallace	1.4	\$1,350	\$1,890	com's with GG; JY; MTJ; Waters; Mastin re draft facility reports	Class Certification
8/2/2021	Guy Wallace	3.4	\$1,350	\$4,590	preparation and drafting of Declaration of Waters re class certification	Class Certification
8/2/2021	Guy Wallace	1.2	\$1,350	\$1,620	com's with MTJ re preparation of Waters and Mastin Declarations re class certification; construction history of facilities inspected by P's	Class Certification
8/2/2021	Guy Wallace	1.7	\$1,350	\$2,295	review and analysis of draft of class cert brief; revise and edit same; com's with D's re proposed stipulation re page length	Class Certification
8/2/2021	Guy Wallace	0.7	\$1,350	\$945	com's with Waters re draft facility reports; construction history of facilities	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/2/2021	Guy Wallace	0.8	\$1,350	\$1,080	com's with Stebner; GG; MTJ re settlement and com's from Charlie Lee re same	Settlement
8/2/2021	Mark Johnson	0.6	\$1,150	\$690	call w/ GBW re Mastin and Waters declarations, alterations and review of EOs summary of construction history	Class Certification
8/2/2021	Mark Johnson	1.0	\$1,150	\$1,150	conference call w/ GBW, GCG, JY, Mastin and Waters re expert reports, tolerances, bsrriers to exclude from reports, strategy for completion of review and edits of same.	Class Certification
8/2/2021	Mark Johnson	1.0	\$1,150	\$1,150	review and comment on Lane and Frazin class declaratrions	Class Certification
8/2/2021	Mark Johnson	0.6	\$1,150	\$690	further calls (x3) w/GBW re position on overlength brief and communications w/ OC re same, expert declarations; tracking inspections and reports	Class Certification
8/2/2021	Mark Johnson	0.7	\$1,150	\$805	further review and analysis of inspection and report record and com w/ Waters and Wallace re same; revise spreadsheet tracking inspection and report status	Class Certification
8/2/2021	Mark Johnson	0.6	\$1,150	\$690	review and revise depo exhivit lsit	Class Certification
8/2/2021	Mark Johnson	4.7	\$1,150	\$5,405	review of deposition transcripts for testimony on ADA policies, alterations, new construction, surveys, etc. for incorporation into declaration, revise draft declarations re same; review alteration and construction history for same	Class Certification
8/2/2021	Mark Johnson	0.3	\$1,150	\$345	call w/ gBW,, GCG, Stebner re informaiton from D representative Charlie Lee re settlement issues, insuranxe covcorage	Settlement
8/2/2021	Rachel Steyer	0.4	\$750	\$300	rereviewing and updating class member declaration for NRD to conduct read through	Class Certification
8/2/2021	Rachel Steyer	1.3	\$750	\$975	completing drafting of class member declaration	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/2/2021	Rachel Steyer	0.5	\$750	\$375	editing and reviewing TPC draft declaration	Class Certification
8/2/2021	Rachel Steyer	0.2	\$750	\$150	email to TPC with comments on declaration	Class Certification
8/2/2021	Rachel Steyer	0.2	\$750	\$150	editing and updated NCN draft declaration	Class Certification
8/2/2021	Rachel Steyer	0.2	\$750	\$150	reviewing and incorporating MTJ feedback and edits	Class Certification
8/2/2021	Rachel Steyer	0.2	\$750	\$150	updating declaration trackign spreadsheets	Class Certification
8/2/2021	Rachel Steyer	0.2	\$750	\$150	call with PXM to discuss outreach assignments	Class Outreach and Contact
8/2/2021	Rachel Steyer	0.2	\$750	\$150	reviewing partial NRD draft of declaration and intake	Class Outreach and Contact
8/2/2021	Rachel Steyer	0.2	\$750	\$150	email response to NRD re whether to proceed ahead with drafting declaration	Class Outreach and Contact
8/2/2021	Rachel Steyer	0.3	\$750	\$225	communications on teams with TRB, NRD, RAG< TCP, NCN re ongoing outreach and assignments	Class Outreach and Contact
8/2/2021	Rachel Steyer	1.6	\$750	\$1,200	reviewing list of older intakes and evaluating for potential declarant	Class Outreach and Contact
8/2/2021	Rachel Steyer	0.6	\$750	\$450	reviewing old intakes and evaluating for potential declarants	Class Outreach and Contact
8/2/2021	Travis Close	0.7	\$850	\$595	Research prior caselaw on deficient emergency plans due to no guidance for ppl with disabilities getting to ground floor	Class Certification
8/2/2021	Travis Close	0.3	\$850	\$255	Email to GBW re: missing June Kailes dec from ECF of prior case due to trial	Class Certification
8/2/2021	Travis Close	0.4	\$850	\$340	Review and analyze edits to draft dec of June Kails by GBW	Class Certification
8/2/2021	Travis Close	1.7	\$850	\$1,445	Review/analyze all signed class member declarations to cite to class members who lived on upper floors	Class Certification
8/2/2021	Travis Close	0.3	\$850	\$255	Review and analyze requirements in DSS emergency evacuation statute	Class Certification
8/2/2021	Travis Close	1.2	\$850	\$1,020	Review and analyze depo transcripts for testimony re: training on emergency evacuation of people with disabilities down stairs	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/2/2021	Travis Close	0.2	\$850	\$170	Review and analyze status of claims for class member Mark Kelleher	Class Outreach and Contact
8/2/2021	Travis Close	1.6	\$850	\$1,360	Research prior declarations of June Kailes from the cases: communities actively living independent and free v. los angeles; Brooklyn center for independ.v. bloomberg	Experts (Including Retention)
8/2/2021	Travis Close	0.2	\$850	\$170	Email to GBW re: declaration of June Kailes iso MSJ in prior LA case	Experts (Including Retention)
8/2/2021	Travis Close	0.5	\$850	\$425	Review and analyze edits to draft dec of June Kailes by GBW	Experts (Including Retention)
8/2/2021	Travis Close	0.2	\$850	\$170	Email to GBW re: further edits to Kailes declaration	Experts (Including Retention)
8/3/2021	Guy Wallace	3.1	\$1,350	\$4,185	preparation of Waters Declaration re class cert; com's with CC re same and construction history of facilities	Class Certification
8/3/2021	Guy Wallace	0.3	\$1,350	\$405	com's with RLS re putative class member declarations; preparation of summary chart re same	Class Certification
8/3/2021	Guy Wallace	1.3	\$1,350	\$1,755	review and analysis of draft Mastin declaration re class certification; revise and edit same	Class Certification
8/3/2021	Guy Wallace	0.2	\$1,350	\$270	com's with Kennedy; Petite re draft declaration re damages model	Experts (Including Retention)
8/3/2021	Guy Wallace	0.3	\$1,350	\$405	com's with TCC re draft Kailes declaration; Cross declaration re class certification	Experts (Including Retention)
8/3/2021	Guy Wallace	1.6	\$1,350	\$2,160	review and analysis of draft facility reports from Waters and Mastin; revise and edit same; com's with GG; JY; MTJ re same	Experts (Including Retention)
8/3/2021	Mark Johnson	0.9	\$1,150	\$1,035	calls (x5) w/ GBW re use of confidential info from othe case by experts	Class Certification
8/3/2021	Mark Johnson	0.4	\$1,150	\$460	calls w/ GBW (x3) re standard language for expert reports re representative nature of units inspected, stipulatoin	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/3/2021	Mark Johnson	0.4	\$1,150	\$460	email exchange w/ COC Marks re documenets for Flores depo, com w/ staff re collecting same	Class Certification
8/3/2021	Mark Johnson	0.2	\$1,150	\$230	com w/ AX re citations for brief statement of facts	Class Certification
8/3/2021	Mark Johnson	0.7	\$1,150	\$805	legal reseach re expert use of confidential info from prior case.	Class Certification
8/3/2021	Mark Johnson	0.4	\$1,150	\$460	review emails and exemplars re revisions to expert reports.	Class Certification
8/3/2021	Mark Johnson	5.5	\$1,150	\$6,325	review expert reports, construcion history for brookdale cites and revise add portions to Mastin declaration	Class Certification
8/3/2021	Mark Johnson	0.5	\$1,150	\$575	review and propose edits to class declaration	Class Certification
8/3/2021	Rachel Steyer	1.7	\$750	\$1,275	conducted final read through call with class member declarant, added additional language to declaration	Class Certification
8/3/2021	Rachel Steyer	0.3	\$750	\$225	phone call with GBW to discuss status of class mmeber declarations	Class Certification
8/3/2021	Rachel Steyer	1.5	\$750	\$1,125	conducted read through with class member declarant to finalize declaration	Class Certification
8/3/2021	Rachel Steyer	0.7	\$750	\$525	phone call with class member declarant to review and correct details in declaration	Class Certification
8/3/2021	Rachel Steyer	0.3	\$750	\$225	editing and revising NCN class member declaration	Class Certification
8/3/2021	Rachel Steyer	0.7	\$750	\$525	editing and revising RVR draft declaration	Class Certification
8/3/2021	Rachel Steyer	0.3	\$750	\$225	editing and revising NRD draft declaration	Class Certification
8/3/2021	Rachel Steyer	0.3	\$750	\$225	reviewing TPC draft declaration, sending email with comments as to whether or not to proceed ahead with drafting declaration	Class Certification
8/3/2021	Rachel Steyer	0.2	\$750	\$150	editing NCN draft clsas member declaration	Class Certification
8/3/2021	Rachel Steyer	0.4	\$750	\$300	email to TCC, GBW, MTJ and cocounsel listing potential categories for chart to prepare organizing info in declarations	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/3/2021	Rachel Steyer	0.4	\$750	\$300	reviewing and editing BCR intake with class member for possible declaration	Class Outreach and Contact
8/3/2021	Rachel Steyer	0.2	\$750	\$150	email to BCR with feedback on intake	Class Outreach and Contact
8/3/2021	Rachel Steyer	0.2	\$750	\$150	communications on teams with outreach team to discuss ongoing assignments	Class Outreach and Contact
8/3/2021	Rachel Steyer	0.2	\$750	\$150	reviewing documents for class member declarant	Discovery (Non-Deposition)
8/3/2021	Travis Close	0.3	\$850	\$255	Email to June Kailes (expert) re: draft declaration ready for review + transportation contract	Class Certification
8/3/2021	Travis Close	0.3	\$850	\$255	Call with GBW re: declaration needed for expert Doug Cross	Class Certification
8/3/2021	Travis Close	0.9	\$850	\$765	Review and analyze latest draft of class cert brief with edits made by GBW	Class Certification
8/3/2021	Travis Close	0.7	\$850	\$595	Review and analyze draft opinions by transportation expert	Class Certification
8/3/2021	Travis Close	0.4	\$850	\$340	Analyze draft class cert brief for sections related to accessible transportation deficiencies	Class Certification
8/3/2021	Travis Close	0.6	\$850	\$510	Review and analyze draft Intro and Facts Section F (uniform misrepresentation) by AXU of co-counsel	Class Certification
8/3/2021	Travis Close	1.3	\$850	\$1,105	Legal research re: DOT regulations on accessible transportation pursuant to Title II of ADA	Class Certification
8/3/2021	Travis Close	0.2	\$850	\$170	Review and analyze draft dec of GCG iso class cert	Class Certification
8/3/2021	Travis Close	0.3	\$850	\$255	Email to team & co-counsel re: inspections stipulation; whether expert reports are confidential	Class Certification
8/3/2021	Travis Close	0.4	\$850	\$340	Analyze stipulation re: expert inspections to determine if expert reports & photos must be filed under seal	Class Certification
8/3/2021	Travis Close	1.3	\$850	\$1,105	Begin drafting dec of Doug Cross iso Mtn for class cert (transportation policy) (outline)	Class Certification
8/3/2021	Travis Close	0.2	\$850	\$170	Email to GW (expert) re: confirming inspection dates for certain facilities	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/3/2021	Travis Close	1.7	\$850	\$1,445	Further edits to draft dec of June Kailes iso mtn for class cert	Experts (Including Retention)
8/4/2021	Guy Wallace	0.5	\$1,350	\$675	revise and edit draft of Mastin declaration re class certification	Class Certification
8/4/2021	Guy Wallace	0.5	\$1,350	\$675	com's with Maatman; GG; MTJ re proposed stipulation re page length on briefing; analysis of same	Class Certification
8/4/2021	Guy Wallace	0.8	\$1,350	\$1,080	team call re preparation for class certification motion	Class Certification
8/4/2021	Guy Wallace	0.2	\$1,350	\$270	com's with TCC re preparation of declaration of Cross re class cert	Class Certification
8/4/2021	Guy Wallace	0.9	\$1,350	\$1,215	preparation of new guidelines re revisions to draft expert reports based on team call with Waters and Mastin	Experts (Including Retention)
8/4/2021	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re draft facility reports	Experts (Including Retention)
8/4/2021	Guy Wallace	0.4	\$1,350	\$540	com's with Waters re preparation of draft facility reports	Experts (Including Retention)
8/4/2021	Guy Wallace	1.2	\$1,350	\$1,620	review and analysis of chart of CBC standards from 1981 through 2010	Experts (Including Retention)
8/4/2021	Guy Wallace	1.3	\$1,350	\$1,755	prepare for and participate in ZOOM with Waters; Mastin; GG; JY; MTJ re draft facility reports and tolerance issues	Experts (Including Retention)
8/4/2021	Guy Wallace	0.2	\$1,350	\$270	com's with Kailes; TCC re preparation of declaration re class cert	Experts (Including Retention)
8/4/2021	Mark Johnson	0.9	\$1,150	\$1,035	draft stipulation for enlargement of page limitation on class cert brief; coms w/ COC re same	Class Certification
8/4/2021	Mark Johnson	0.4	\$1,150	\$460	coms w/ GBW and OC GLM re proposed stip on page liimints on motion	Class Certification
8/4/2021	Mark Johnson	0.8	\$1,150	\$920	Zoom call w/ COC re status of each component of class cert filing, items that need sealing and assignment of responsibilities.	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/4/2021	Mark Johnson	0.7	\$1,150	\$805	call w/ GBW, JY, CGC re issues on expert reports to be discussed in mtg w/ experts	Class Certification
8/4/2021	Mark Johnson	0.4	\$1,150	\$460	calls w/ GBW re CBC versions and comparison to federal standards, review chart of same	Class Certification
8/4/2021	Mark Johnson	0.2	\$1,150	\$230	call w/ R Stiner re decs iso class certification; mtg to sign same	Class Certification
8/4/2021	Mark Johnson	0.2	\$1,150	\$230	call and emails w/ GCG re strategy for seeking page limit enlargement and form of stip	Class Certification
8/4/2021	Mark Johnson	1.5	\$1,150	\$1,725	work on Stiner declaraion	Class Certification
8/4/2021	Mark Johnson	0.8	\$1,150	\$920	review Stiner doc production for facts for Stiner declaration	Class Certification
8/4/2021	Mark Johnson	1.5	\$1,150	\$1,725	zoom call w/ experts mastin and waters and GBW, JY, GCG re draft facility reports and issues related to tolerances, inclusion of certain items	Experts (Including Retention)
8/4/2021	Mark Johnson	0.5	\$1,150	\$575	calls w/ GBW re expert facility reports	Experts (Including Retention)
8/4/2021	Mark Johnson	1.0	\$1,150	\$1,150	reveiw of portions of expert reports for class cert for discussion w/ team and experts	Experts (Including Retention)
8/4/2021	Rachel Steyer	0.8	\$750	\$600	call with RBGG cocounsel and GBW, TCC, MTJ to discuss outstanding assignments	Class Certification
8/4/2021	Rachel Steyer	0.7	\$750	\$525	editing and revising RVR draft declaration	Class Certification
8/4/2021	Rachel Steyer	0.4	\$750	\$300	reviewing and gathering residency agreement for liekly declarant	Discovery (Non-Deposition)
8/4/2021	Travis Close	0.4	\$850	\$340	Review/analyze DSS email updates where facility status changed to CLOSED (facility divested/change of managemetn)	Case Organization, Planning and Strategy
8/4/2021	Travis Close	0.9	\$850	\$765	Team meeting w/ MTJ, GBW, RLS, and co-counsel re: expert declarations, class member declarations progress for upcoming motion for class cert	Class Certification
8/4/2021	Travis Close	1.3	\$850	\$1,105	Continue drafting declaration of doug cross iso class cert (qualifications)	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/4/2021	Travis Close	1.4	\$850	\$1,190	Continue drafting declaration of doug cross iso class cert (presentations, conferences & significant publications)	Class Certification
8/4/2021	Travis Close	0.9	\$850	\$765	Review history of projects and consultancy for expert Douglas J. Cross	Experts (Including Retention)
8/4/2021	Travis Close	0.4	\$850	\$340	Analyze resume/CV and list of publications and presentations for expert Douglas J. Cross	Experts (Including Retention)
8/4/2021	Travis Close	1.7	\$850	\$1,445	Legal research re: prior cases with appearance by Doug Cross to find examples of his prior declarations	Experts (Including Retention)
8/4/2021	Travis Close	0.2	\$850	\$170	Email to GBW re: prior declarations from expert doug cross	Experts (Including Retention)
8/4/2021	Travis Close	0.2	\$850	\$170	Email to Doug Cross re: sample declaration for review and expectations for work	Experts (Including Retention)
8/4/2021	Travis Close	0.4	\$850	\$340	Call with Doug Cross re: narrative of current work, past experience, and qualifications needed in declaration	Experts (Including Retention)
8/4/2021	Travis Close	0.2	\$850	\$170	Email to GBW re: expert report review of Tracy facility inspection	Experts (Including Retention)
8/5/2021	Guy Wallace	0.7	\$1,350	\$945	preparation and drafting of declaration of Waters re class certification	Class Certification
8/5/2021	Guy Wallace	1.3	\$1,350	\$1,755	preparation of Waters declaration re new construction and facilities constructed between 1977 through 1993	Class Certification
8/5/2021	Guy Wallace	0.9	\$1,350	\$1,215	revise and edit declarations of Stacy Stiner and Rita Stiner	Class Certification
8/5/2021	Guy Wallace	2.4	\$1,350	\$3,240	review and analysis of draft facility reports from Waters and Mastin; revise and edit same	Experts (Including Retention)
8/5/2021	Mark Johnson	0.5	\$1,150	\$575	coms w/ GBW re proposed stip and order for enlargement of page limination; revise to incorporate same and add order; com w/ OC re approval and staff e filing.	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/5/2021	Mark Johnson	0.1	\$1,150	\$115	com w. S Colby re questions coms w/ Brookdale.	Class Certification
8/5/2021	Mark Johnson	0.2	\$1,150	\$230	coms (texts) w/ /R Stiner re declarations and meeting.	Class Certification
8/5/2021	Mark Johnson	4.5	\$1,150	\$5,175	research facts and continue working on client declaratoin	Class Certification
8/5/2021	Mark Johnson	2.3	\$1,150	\$2,645	work on Rita Stiner declaration; review records re same and draft email to COC re same	Class Certification
8/5/2021	Mark Johnson	0.8	\$1,150	\$920	coms (email and calls) w/ GBW and RBGG counsel re issues on expert reports; review excerpts from reports for same.	Experts (Including Retention)
8/5/2021	Rachel Steyer	0.7	\$750	\$525	editing and revising RAG intakes and declarations	Class Certification
8/5/2021	Rachel Steyer	0.2	\$750	\$150	email to RAG with comments re intakes and declarations	Class Certification
8/5/2021	Rachel Steyer	2.9	\$750	\$2,175	reviewing and adding citations from declarations into draft brief	Class Certification
8/5/2021	Rachel Steyer	0.2	\$750	\$150	reviewing ASW intake	Class Outreach and Contact
8/5/2021	Rachel Steyer	0.4	\$750	\$300	email to outreach team (RVR, TCP, BCR, RAG, NRD, NCN, ASW, PX) regarding model declarations and info sought	Class Outreach and Contact
8/5/2021	Rachel Steyer	0.3	\$750	\$225	received phone call from class member, scheduled intake	Class Outreach and Contact
8/5/2021	Rachel Steyer	0.5	\$750	\$375	call with RVR to discuss potential declarant	Class Outreach and Contact
8/5/2021	Rachel Steyer	0.2	\$750	\$150	reviewing ASW partial intake	Class Outreach and Contact
8/5/2021	Rachel Steyer	0.2	\$750	\$150	response to ASW providing commetnary and feedback on partial intake	Class Outreach and Contact
8/5/2021	Rachel Steyer	0.2	\$750	\$150	response to ASW answering questions about communication with family member	Class Outreach and Contact
8/5/2021	Travis Close	0.5	\$850	\$425	Review and analyze edits to draft Kailes dec by JK	Class Certification
8/5/2021	Travis Close	0.2	\$850	\$170	Email to JK re: edits to draft dec for class cert	Class Certification
8/5/2021	Travis Close	0.2	\$850	\$170	Email to JK, GBW re: planning meeting for next Monday	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/5/2021	Travis Close	0.8	\$850	\$680	Expert report review - Review and analyze chart by GBW showing progression of ANSI standards from 1991 through ADAS and ADAAG (2010)	Class Certification
8/5/2021	Travis Close	0.9	\$850	\$765	Expert report review - Review examples found by BBK where CBC standards only apply, or CBC standards and 2010 ADAS	Class Certification
8/5/2021	Travis Close	0.5	\$850	\$425	Analyze 2010 ADAS standards for clear space under tables	Class Certification
8/5/2021	Travis Close	0.7	\$850	\$595	Review/analyze revised draft of class cert brief with additional citations by AXU	Class Certification
8/5/2021	Travis Close	0.2	\$850	\$170	Email to AXU re: adding citations to assigned sections of class cert brief	Class Certification
8/6/2021	Guy Wallace	5.6	\$1,350	\$7,560	preparation and drafting of declaration of Waters re class cert	Class Certification
8/6/2021	Guy Wallace	1.1	\$1,350	\$1,485	com's with Marks; JT; MTJ re preparation of Flores and Schroyer declarations re class cert	Class Certification
8/6/2021	Guy Wallace	0.8	\$1,350	\$1,080	team ZOOM re preparation for class certification and documents to be submitted re same	Class Certification
8/6/2021	Guy Wallace	0.5	\$1,350	\$675	legal research re standards for remediation of federal and state non-compliant construction	Class Certification
8/6/2021	Guy Wallace	3.3	\$1,350	\$4,455	revise and edit draft reports re Cortona Park; Tracy; Whittier; North Fremont; revised versions of notes re editing draft reports; com's with Waters; Mastin; GG; JY; BBK; MTJ; TCC re same (1.1)	Experts (Including Retention)
8/6/2021	Guy Wallace	0.3	\$1,350	\$405	com's with TCC re preparation of declaration of Cross re class cert	Experts (Including Retention)
8/6/2021	Mark Johnson	0.7	\$1,150	\$805	call w/ client to discuss declaration iso mtn for class certification	Class Certification
8/6/2021	Mark Johnson	1.7	\$1,150	\$1,955	mtg w/ client and mother to review draft declaration iso mtn for class certification	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/6/2021	Mark Johnson	1.0	\$1,150	\$1,150	call w/ GBW, J Thornton, D Marks re information needed for Flores declarion	Class Certification
8/6/2021	Mark Johnson	0.8	\$1,150	\$920	team mtg re class certification filing, status of each component	Class Certification
8/6/2021	Rachel Steyer	0.3	\$750	\$225	call with class member declarant to review last minute questions before sending for signature	Class Certification
8/6/2021	Rachel Steyer	0.2	\$750	\$150	editing and revising NCN draft declaration	Class Certification
8/6/2021	Rachel Steyer	0.9	\$750	\$675	weekly meeting with RBGG cocounsel and TCC, MTJ, GBW to discuss assignmetns in preparation for filing motion for class certification	Class Certification
8/6/2021	Rachel Steyer	0.2	\$750	\$150	email to co-counsel and GBW, MTJ, TCC re declarants with visual impairments	Class Certification
8/6/2021	Rachel Steyer	0.3	\$750	\$225	editing RVR draft declaration	Class Certification
8/6/2021	Rachel Steyer	0.2	\$750	\$150	editing NRD class member declaration	Class Certification
8/6/2021	Rachel Steyer	0.4	\$750	\$300	editing and revising NRD draft class member declaration	Class Certification
8/6/2021	Rachel Steyer	0.3	\$750	\$225	editing and reviewing NRD draft declaration	Class Certification
8/6/2021	Rachel Steyer	0.3	\$750	\$225	editing and revising NRD draft class member declaration	Class Certification
8/6/2021	Rachel Steyer	0.3	\$750	\$225	editing and revising NCN draft declaration	Class Certification
8/6/2021	Rachel Steyer	0.5	\$750	\$375	email to GBW, MTJ, TCC and co-counsel following up with GBW re questions about citations and corresponding fact statements in MPA ISO class cert based latest draft circulated	Class Certification
8/6/2021	Rachel Steyer	0.9	\$750	\$675	adding declaration citations to MPA ISO class certification	Class Certification
8/6/2021	Rachel Steyer	0.5	\$750	\$375	reviewing spreadsheet circulated by MTJ of class members with visual impairments, comparing to class list in sharepoint	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/6/2021	Travis Close	0.3	\$850	\$255	Calls to GBW re: issues with facial violations of DOT/DOJ regs in fleet safety policy for Doug Cross report	Case Organization, Planning and Strategy
8/6/2021	Travis Close	0.5	\$850	\$425	Review, analyze, & edit draft declaration of helen fisher iso class cert	Class Certification
8/6/2021	Travis Close	0.6	\$850	\$510	Review, analyze, & edit draft declaration of mary gallagher iso class cert	Class Certification
8/6/2021	Travis Close	0.2	\$850	\$170	Review and analyze draft "cheat cheet" for reference in reviewing expert inspection reports	Class Certification
8/6/2021	Travis Close	0.6	\$850	\$510	Review and analyze GBW edits to draft inspection report for Cortona Park facility to use as template	Class Certification
8/6/2021	Travis Close	0.8	\$850	\$680	Team meeting with co-counsel re: progress on class cert filings: class member declarations, expert declarations and inspection reports, new plaintiff search, etc	Class Certification
8/6/2021	Travis Close	0.3	\$850	\$255	Analyze list of class members with visual impairments created by Marks' team	Class Certification
8/6/2021	Travis Close	0.2	\$850	\$170	Review and anlyze updated filing checklist for class cert motion	Class Certification
8/6/2021	Travis Close	0.5	\$850	\$425	Analyze changes to Brookdale's new fleet safety policy v. old policy	Class Certification
8/6/2021	Travis Close	1.3	\$850	\$1,105	Continue drafting Doug Cross dec iso class cert (background, relevant DOT/DOJ regs at issue)	Class Certification
8/6/2021	Travis Close	1.4	\$850	\$1,190	Continue drafting Doug Cross dec iso class cert (deficiently in policy re scooters)	Class Certification
8/6/2021	Travis Close	0.5	\$850	\$425	Review and analyze depo exhibits to find fleet safety policy	Depositions
8/7/2021	Guy Wallace	4.4	\$1,350	\$5,940	preparation and drafting of Waters declaration re class certification	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/7/2021	Guy Wallace	1.1	\$1,350	\$1,485	revise and edit draft Mastin declaration; com's with MTJ re same	Class Certification
8/7/2021	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of draft facility reports; revise and edit same; com's with co-counsel re same	Experts (Including Retention)
8/8/2021	Guy Wallace	0.5	\$1,350	\$675	review and analysis of further draft of Mastin declaration re class cert; revise and edit same	Class Certification
8/8/2021	Guy Wallace	3.2	\$1,350	\$4,320	review and analysis of draft facility reports; revise and edit same; review and analysis of construction history of Brookdale facilities; com's with Mastin; JY; MTJ re same	Class Certification
8/8/2021	Guy Wallace	1.6	\$1,350	\$2,160	revise and edit draft Waters and Mastin Declarations; com's with Waters; Mastin; MTJ re same	Class Certification
8/8/2021	Guy Wallace	2.9	\$1,350	\$3,915	revise and edit draft class cert brief, statement of facts; com's with MTJ; RLS re same (1.1	Class Certification
8/8/2021	Mark Johnson	0.8	\$1,150	\$920	meet w/ client and mother for final review and execution of decs iso class cert motion	Class Certification
8/8/2021	Rachel Steyer	1.0	\$750	\$750	phone call with GBW to discuss preparing chart and fact citations to brief	Class Certification
8/8/2021	Travis Close	0.5	\$850	\$425	Analyze latest updates to team review process re: inspection reports from team correspondence & cheat sheet	Class Certification
8/9/2021	Guy Wallace	6.6	\$1,350	\$8,910	revise and edit draft of class cert brief	Class Certification
8/9/2021	Guy Wallace	1.4	\$1,350	\$1,890	com's with JT; BBK; MTJ re analysis of DSS citations and most effective means of presenting same to support class certification	Class Certification
8/9/2021	Guy Wallace	0.4	\$1,350	\$540	review and analysis of draft declaration of Cross	Class Certification
8/9/2021	Guy Wallace	0.4	\$1,350	\$540	com's with RLS re preparation of chart analyzing class member experiences	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/9/2021	Guy Wallace	1.3	\$1,350	\$1,755	com's with Waters; Mastin; MTJ; TCC re draft declarations re class cert and construction history; draft facility reports; analysis of construction history of Brookdale facilities	Experts (Including Retention)
8/9/2021	Guy Wallace	0.4	\$1,350	\$540	com's with JT; MTJ re draft declaration of Dr. Flores re class certification	Experts (Including Retention)
8/9/2021	Mark Johnson	0.8	\$1,150	\$920	call w/ JM re Brookhurst report	Class Certification
8/9/2021	Mark Johnson	0.6	\$1,150	\$690	call w/ GBW re brief iso mtn to certify class issues re DSS ciitations and BBK declaration, temporal scope of class #3	Class Certification
8/9/2021	Mark Johnson	0.9	\$1,150	\$1,035	call w/ Thornton, BBK, E Heyward re BBK declaration with DDS citations as exhibits and reference in Flores declaration.	Class Certification
8/9/2021	Mark Johnson	0.1	\$1,150	\$115	cll w/ RLS re status of chart of class member declartions	Class Certification
8/9/2021	Mark Johnson	0.2	\$1,150	\$230	call w/ BBK re scope of exhibits of DSS citations for declsrstion and characterization of same	Class Certification
8/9/2021	Mark Johnson	0.3	\$1,150	\$345	calls x3 w/ GBW re issues for brief iso class cert., expert reports and approach to using CDSS ciitations iso mtn	Class Certification
8/9/2021	Mark Johnson	3.7	\$1,150	\$4,255	review, edit and comment on JM expert report	Experts (Including Retention)
8/9/2021	Rachel Steyer	0.7	\$750	\$525	phone call with class member declarant to review declaration	Class Certification
8/9/2021	Rachel Steyer	0.3	\$750	\$225	phone call with co-counsel to discuss tasks and assisting with finalizing brief	Class Certification
8/9/2021	Rachel Steyer	0.3	\$750	\$225	editing NCN draft class member declaration	Class Certification
8/9/2021	Rachel Steyer	0.5	\$750	\$375	editing and revising NRD draft class member declaration	Class Certification
8/9/2021	Rachel Steyer	0.2	\$750	\$150	phone call with NRD to discuss lingering questions re class member declaration	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/9/2021	Rachel Steyer	0.2	\$750	\$150	response to GBW about fact citations	Class Certification
8/9/2021	Rachel Steyer	0.3	\$750	\$225	editing NRD draft declaration	Class Certification
8/9/2021	Rachel Steyer	0.4	\$750	\$300	checking declaraiton support for fact citations in brief	Class Certification
8/9/2021	Rachel Steyer	0.3	\$750	\$225	reviewing and editing NRD draft declaration	Class Certification
8/9/2021	Rachel Steyer	0.3	\$750	\$225	editing and revising RAG draft class member declaration	Class Certification
8/9/2021	Rachel Steyer	5.1	\$750	\$3,825	preparing and working on chart/appendix summarizing declarations	Class Certification
8/9/2021	Rachel Steyer	0.3	\$750	\$225	reviewing RAG intake	Class Outreach and Contact
8/9/2021	Rachel Steyer	0.4	\$750	\$300	communications with teams with outreach group (TRB, RAG, NCN, TCP, NRD) about ongoing outreach assignments	Class Outreach and Contact
8/9/2021	Travis Close	0.2	\$850	\$170	Email to BBK re: revised cheat sheet for expert inspection reports review	Class Certification
8/9/2021	Travis Close	0.3	\$850	\$255	Review and analyze revised cheat sheet by BBK for expert inspection report review	Class Certification
8/9/2021	Travis Close	1.2	\$850	\$1,020	Brookdale Riverside - research date of construction using Brookdale's records; City-produced documents, and records from Riverside County website	Class Certification
8/10/2021	Guy Wallace	1.6	\$1,350	\$2,160	review and analysis of draft declaration of Flores; revise and edit same; com's with DTM; JT; MTJ re same	Class Certification
8/10/2021	Guy Wallace	4.9	\$1,350	\$6,615	revise and edit draft of class certification brief	Class Certification
8/10/2021	Guy Wallace	2.8	\$1,350	\$3,780	revise and edit draft of class certification brief; statement of facts; com's with MTJ re same (.5)	Class Certification
8/10/2021	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of draft facility reports; com's with Waters; Mastin; TCC re same	Experts (Including Retention)
8/10/2021	Mark Johnson	1.5	\$1,150	\$1,725	doc research for doc addressing question of travel time analysis by D for consideration by expert Dr. Flores	Case / Document Administration

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/10/2021	Mark Johnson	0.4	\$1,150	\$460	emails w/ RAB and GBW (x3) and call w/ GBW re analysis of opt out numbers for Marquis declaration for different time periods.	Class Certification
8/10/2021	Mark Johnson	1.0	\$1,150	\$1,150	review of class declarations iso mtn for class cert and comment on /edit same; coms w/ RLS re same	Class Certification
8/10/2021	Mark Johnson	0.2	\$1,150	\$230	call w/ JY re status and logistics of review of expert reports	Class Certification
8/10/2021	Mark Johnson	0.3	\$1,150	\$345	emails w/ Walker/Thornton and with EO re searches for docs re travel times for caregivers for consideration by Dr. Flores	Class Certification
8/10/2021	Mark Johnson	0.1	\$1,150	\$115	email exchange w/ Marks, Wallace, Thorndon re inclusion in Schroyer dec of statements re MedModel usage in past cases.	Class Certification
8/10/2021	Mark Johnson	0.3	\$1,150	\$345	coms w/ GW re edits to expert report; incorporate edits, remove notes and convey to RBGG for renumbering, finalizing	Class Certification
8/10/2021	Mark Johnson	0.2	\$1,150	\$230	review proposed language for expert declaration re accommodations in staffing, com w/ GBW re same	Class Certification
8/10/2021	Mark Johnson	0.4	\$1,150	\$460	review language from draft brief re CDSS citations and declarations; call w/ GBW and BBK re same and re language for BBK declaration and presentation of DSS citations as exhibits, description of same	Class Certification
8/10/2021	Mark Johnson	1.1	\$1,150	\$1,265	calls (x3) w/ GBW re issues on brief iso class cert mtn, including approach to citng class declarations, use of chart, Steyer declaration as compilation; citations to Bowman depositions	Class Certification
8/10/2021	Mark Johnson	0.3	\$1,150	\$345	review and analysis of Bowman Errata on Access depo (topic 2) and implications of same, com w/ GBW re same	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/10/2021	Mark Johnson	0.2	\$1,150	\$230	review May email from OC re privilege log and clawback; email xchg w COC AX re same	Discovery (Non-Deposition)
8/10/2021	Mark Johnson	0.3	\$1,150	\$345	review email covers for doc productions and certain spreadsheets produced; emails to Marks, Thornton and RAB re supplemental PSS production	Discovery (Non-Deposition)
8/10/2021	Mark Johnson	3.5	\$1,150	\$4,025	complete review, analysis and comment on Waters expert report	Experts (Including Retention)
8/10/2021	Rachel Steyer	0.2	\$750	\$150	adding in and incorporating MTJ edits to NRD declarations	Class Certification
8/10/2021	Rachel Steyer	0.3	\$750	\$225	editing and reviewing NCN draft declaration	Class Certification
8/10/2021	Rachel Steyer	0.2	\$750	\$150	editing and revising RAG draft declaration	Class Certification
8/10/2021	Rachel Steyer	0.2	\$750	\$150	drafting and editing NCN class member declaration	Class Certification
8/10/2021	Rachel Steyer	0.3	\$750	\$225	final review of class member declaration befoer sending out for signature	Class Certification
8/10/2021	Rachel Steyer	4.4	\$750	\$3,300	preparing and updating chart of declaration appendix	Class Certification
8/10/2021	Travis Close	0.2	\$850	\$170	Email to BMU re: prep for tomorrow's team meeting	Case Organization, Planning and Strategy
8/10/2021	Travis Close	0.2	\$850	\$170	Email to GBW re: tomorrow's meeting presenting conflict with meeting with expert	Case Organization, Planning and Strategy
8/10/2021	Travis Close	0.3	\$850	\$255	Review and analyze team correspondence re: whether to include tactile sign barriers	Case Organization, Planning and Strategy
8/10/2021	Travis Close	0.3	\$850	\$255	Call with JY (co-counsel) re: updates to inspection report review progress	Case Organization, Planning and Strategy
8/10/2021	Travis Close	0.3	\$850	\$255	Email to team re: working through issues of resident privacy in expert report photos	Case Organization, Planning and Strategy
8/10/2021	Travis Close	0.4	\$850	\$340	Review and analyze updated visit info (Inspection Reports) from Cal DSS for Garden Grove, Monrovia, North Fremont facilities	Class Certification
8/11/2021	Guy Wallace	0.7	\$1,350	\$945	preparation of motion for class certification; review of expert declarations to be prepared and finalized	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/11/2021	Guy Wallace	4.6	\$1,350	\$6,210	revise and edit draft class cert brief; statement of facts	Class Certification
8/11/2021	Guy Wallace	0.9	\$1,350	\$1,215	team ZOOM with GG; BBK; JY; AX; EH; MTJ; TCC; RLS re preparation of class certification motion	Class Certification
8/11/2021	Guy Wallace	2.6	\$1,350	\$3,510	preparation and drafting of class cert brief; re-draft introduction, revise and edit statement of facts	Class Certification
8/11/2021	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ re revisions to class cert brief; GBW declaration; Flores Declaration	Class Certification
8/11/2021	Guy Wallace	0.9	\$1,350	\$1,215	com's with Kailes; TCC re revisions to draft declaration re class certification	Experts (Including Retention)
8/11/2021	Guy Wallace	0.9	\$1,350	\$1,215	com's with Waters; Mastin; JY; MTJ re preparation of facility reports and declarations re class cert	Experts (Including Retention)
8/11/2021	Guy Wallace	0.6	\$1,350	\$810	com's with Cross; TCC re preparation of draft declaration re class certification	Experts (Including Retention)
8/11/2021	Mark Johnson	0.7	\$1,150	\$805	planning call w/ GBW re brief iso class certification; GBW declaration and approach to identification of and reference to exhibits, Dr. Flores declaration and docs considered by her.	Class Certification
8/11/2021	Mark Johnson	0.9	\$1,150	\$1,035	ZOOM video conference with GG; BBK; JY; AX; EH; MTJ; TCC; RLS re preparation of class certification motion and related documents, including expert reports, declarations and exhibits.	Class Certification
8/11/2021	Mark Johnson	0.9	\$1,150	\$1,035	video conference w GBW, JY, Mastin, Waters re preparation of expert reports and expert declarations, review of same and additional information required.	Class Certification
8/11/2021	Mark Johnson	0.8	\$1,150	\$920	review exhibits and docs for additional evidence iso enforcement of benchmarks; insert citations to passages of brief and coms w/ AX and GBW re same,	Class Certification
8/11/2021	Mark Johnson	3.2	\$1,150	\$3,680	complete review and comment on GW expert barrier report; coms w/ /COC and GW re same	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/11/2021	Mark Johnson	0.4	\$1,150	\$460	coms w/ RLS re content of declaration summarizing class declarations	Class Certification
8/11/2021	Mark Johnson	0.3	\$1,150	\$345	review and rework framework of spreadsheet categorizing testimony from class decs for Steyer declaration.	Class Certification
8/11/2021	Mark Johnson	0.3	\$1,150	\$345	review final version of draft Marquis declaration and coms w/ GBW and RAB re revision to same and getting signature	Class Certification
8/11/2021	Rachel Steyer	0.9	\$750	\$675	meeting with RBGG cocounsel and MTJ, GBW, TCC to discuss and review checklist in preparation for filing	Class Certification
8/11/2021	Rachel Steyer	0.2	\$750	\$150	call with MTJ to discuss updating chart/appendix	Class Certification
8/11/2021	Rachel Steyer	0.3	\$750	\$225	editing and revising NCN draft declaration	Class Certification
8/11/2021	Rachel Steyer	0.3	\$750	\$225	editing and revising NRD draft declaration	Class Certification
8/11/2021	Rachel Steyer	0.2	\$750	\$150	editing and finalizing NCN draft declaration	Class Certification
8/11/2021	Rachel Steyer	0.3	\$750	\$225	editing and revising NRD draft declaration	Class Certification
8/11/2021	Rachel Steyer	0.2	\$750	\$150	call with MTJ to discuss breakdown of chart	Class Certification
8/11/2021	Rachel Steyer	0.3	\$750	\$225	editing RAG draft declaration	Class Certification
8/11/2021	Rachel Steyer	0.2	\$750	\$150	editing and revising NCN draft declaration	Class Certification
8/11/2021	Rachel Steyer	3.0	\$750	\$2,250	editing and updating class member declaration charts/appendices to be used in MPA	Class Certification
8/11/2021	Rachel Steyer	0.3	\$750	\$225	communications on teams with outreach team (TCP, NCN, NRD, ASW, PXM) regarding ongoing outreach assignments	Class Outreach and Contact
8/11/2021	Travis Close	1.0	\$850	\$850	Team class cert meeting with RLS, MTJ, GBW, and co-counsel re: progress on expert declarations, class member decs, inspection report review, etc	Class Certification
8/11/2021	Travis Close	0.7	\$850	\$595	Meet with June Kailes, GBW re: changes and edits to expert declaration	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/11/2021	Travis Close	0.4	\$850	\$340	Call with Doug Cross (transportation expert) re: revisions to declaration in background section; timing for meeting later this week	Class Certification
8/11/2021	Travis Close	0.3	\$850	\$255	Call with GBW re: edits to Doug Cross expert report	Class Certification
8/11/2021	Travis Close	0.2	\$850	\$170	Email to Doug cross, GBW re: meeting for tomorrow to review edits to dec	Class Certification
8/11/2021	Travis Close	0.4	\$850	\$340	Review and analyze edits to draft opinions by Doug Cross (transportation expert)	Class Certification
8/11/2021	Travis Close	1.4	\$850	\$1,190	Further revisions to June Kailes declaration in accordance with today's call	Class Certification
8/11/2021	Travis Close	1.8	\$850	\$1,530	Additional revisions and changes to Doug Cross declaration iso class cert	Class Certification
8/11/2021	Travis Close	0.2	\$850	\$170	Email to Doug Cross re: revised version of declaration and tomorrow's meeting	Class Certification
8/12/2021	Guy Wallace	3.3	\$1,350	\$4,455	revise and edit class cert brief	Class Certification
8/12/2021	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ; TCC re Cross declaration	Class Certification
8/12/2021	Guy Wallace	0.4	\$1,350	\$540	com's with Marks; Thornton re Flores and Schroyer analyses	Class Certification
8/12/2021	Guy Wallace	0.3	\$1,350	\$405	com's with AX; MTJ re preparation of declaration of GBW re class certification	Class Certification
8/12/2021	Guy Wallace	1.4	\$1,350	\$1,890	review and analysis of draft Kennedy Declaration; revise and edit same; com's with LP re same (.1)	Experts (Including Retention)
8/12/2021	Guy Wallace	0.4	\$1,350	\$540	com's with Waters re draft reports and declaration re class cert	Experts (Including Retention)
8/12/2021	Guy Wallace	0.4	\$1,350	\$540	com's with Mastin re draft reports and preparation of class cert declarations	Experts (Including Retention)
8/12/2021	Guy Wallace	1.6	\$1,350	\$2,160	review and analysis of draft of Flores Declaration; revise and edit same; com's with BBK re same	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/12/2021	Mark Johnson	6.5	\$1,150	\$7,475	work on GBW declaration, including review and identification of documentary evidence to be attached as exhibits and depo testimony	Class Certification
8/12/2021	Mark Johnson	0.7	\$1,150	\$805	follow up call w expert D Cross and TCC re issues with declaration	Class Certification
8/12/2021	Mark Johnson	0.6	\$1,150	\$690	zoom call w/ expert D Cross and TCC re declaration	Class Certification
8/12/2021	Mark Johnson	1.3	\$1,150	\$1,495	calls (x5) w/ GBW re class cert tasks and issues including exhibits to GBW declaration, D Cross declaration, expert reports and declarations.	Class Certification
8/12/2021	Mark Johnson	0.8	\$1,150	\$920	review draft D Cross declaration iso class cert and prior memo for same for calls w/ Cross, TCC	Class Certification
8/12/2021	Mark Johnson	3.8	\$1,150	\$4,370	continue working on GBW declaration, including review and identification of documentary evidence to be attached as exhibits and depo testimony	Class Certification
8/12/2021	Rachel Steyer	0.2	\$750	\$150	editing and reviewing NRD draft declaration	Class Certification
8/12/2021	Rachel Steyer	0.2	\$750	\$150	phone call with GBW to discuss preparing chart	Class Certification
8/12/2021	Rachel Steyer	0.5	\$750	\$375	editing and reviewing RAG draft declarations	Class Certification
8/12/2021	Rachel Steyer	0.3	\$750	\$225	editing and finalizing NRD draft declaration	Class Certification
8/12/2021	Rachel Steyer	2.2	\$750	\$1,650	drafting and preparing RLS declaration to introduce appendix/tables summarizing factual citations	Class Certification
8/12/2021	Rachel Steyer	4.7	\$750	\$3,525	updating chart to use to prepare appendix for MPA ISO class cert	Class Certification
8/12/2021	Rachel Steyer	0.3	\$750	\$225	reviewing ASW partial intake	Class Outreach and Contact
8/12/2021	Rachel Steyer	0.3	\$750	\$225	communications on teams with NRD, NCN, TCP, RAG about ongoing outreach assignments	Class Outreach and Contact
8/12/2021	Travis Close	0.2	\$850	\$170	Call with GBW re: replacement for today's meeting with doug cross	Case Organization, Planning and Strategy
8/12/2021	Travis Close	0.2	\$850	\$170	Email to doug cross, MTJ re: scheduling another meeting to discuss issues with declaration	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/12/2021	Travis Close	0.5	\$850	\$425	Review and analyze revised brief iso class cert with edits and additions made by GBW	Class Certification
8/12/2021	Travis Close	0.3	\$850	\$255	Review and analyze edits to dec by Doug Cross	Class Certification
8/12/2021	Travis Close	0.3	\$850	\$255	Review and analyze signed version (ready to be filed) of Stacia Stiner declaration	Class Certification
8/12/2021	Travis Close	0.2	\$850	\$170	Email to DJC re: expectation of draft edits to be received this evening	Class Certification
8/12/2021	Travis Close	0.2	\$850	\$170	Email to MTJ re: meeting with expert this afternoon to go over edits to declaration	Class Certification
8/12/2021	Travis Close	0.4	\$850	\$340	Review and analyze draft dec of Kennedy iso class cert	Class Certification
8/12/2021	Travis Close	0.8	\$850	\$680	Meeting w/ doug cross (transport. expert), MTJ re: further revisions to declaration iso class cert	Class Certification
8/12/2021	Travis Close	0.2	\$850	\$170	Email to EH (co-counsel) re: production of DSS materials to defendants	Discovery (Non-Deposition)
8/12/2021	Travis Close	0.7	\$850	\$595	Meeting with MTJ, doug cross re: reviewing changes to doug cross declaration	Experts (Including Retention)
8/12/2021	Travis Close	0.2	\$850	\$170	Review and analyze updated appendix by Cross & list of docs relied upon in forming opinions	Experts (Including Retention)
8/13/2021	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of key emails from D's senior officials re implementation and enforcement of labor controls and SA; review and analysis of draft GBW Declaration re class certification	Class Certification
8/13/2021	Guy Wallace	2.1	\$1,350	\$2,835	revise and edit class certification brief	Class Certification
8/13/2021	Guy Wallace	0.9	\$1,350	\$1,215	prepare for and participate in go-to-meeting with Marks; JT; BBK; MTJ re Flores and Schroyer Declarations re class certification	Class Certification
8/13/2021	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re preparation of Steyer Declaration re class cert; GBW Declaration re class cert	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/13/2021	Guy Wallace	0.9	\$1,350	\$1,215	team ZOOM re preparation of declarations and brief re class certification	Class Certification
8/13/2021	Guy Wallace	1.3	\$1,350	\$1,755	revise and edit draft of Kailes declaration; com's with TCC re same	Class Certification
8/13/2021	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re preparation of Steyer declaration re class member testimony	Class Certification
8/13/2021	Guy Wallace	0.6	\$1,350	\$810	review and analysis of draft of Bien-Kahn declaration re DSS citations; com's with BBK re same	Class Certification
8/13/2021	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ re Wallace Declaration and potential additional exhibits for same	Class Certification
8/13/2021	Guy Wallace	0.4	\$1,350	\$540	com's with RLS; MTJ re preparation of Steyer Declaration re putative class member and witness testimony	Class Certification
8/13/2021	Guy Wallace	1.2	\$1,350	\$1,620	review and analysis of draft of Schroyer declaration re class certification	Class Certification
8/13/2021	Guy Wallace	0.2	\$1,350	\$270	com's with Waters re class cert declaration	Experts (Including Retention)
8/13/2021	Guy Wallace	0.8	\$1,350	\$1,080	preparation of further draft of Waters declaration re class cert; com's with Waters re same	Experts (Including Retention)
8/13/2021	Mark Johnson	1.1	\$1,150	\$1,265	participate in team zoom mtg w/ COC GBW, AX, GCG, RLS, TCC, BU, JY, BBK, KS and EH re status of each component of class cert filing, sealing and redaction issues, expert reports, brief and citation checking, GBW declaration, expert declarations, etc.	Class Certification
8/13/2021	Mark Johnson	0.8	\$1,150	\$920	GTM call w/ Marks, Thornton, GBW, BKK re Flores declaration, staffing analysis, docs considered, data issues, doc search on travel time, Flores use of BBK dec re CDSS citations	Class Certification
8/13/2021	Mark Johnson	0.6	\$1,150	\$690	review and analysis of Kailes dec re emergency and evacuatio policeis	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/13/2021	Mark Johnson	2.4	\$1,150	\$2,760	review and propose edits to remaining class member ./ family member declarations	Class Certification
8/13/2021	Mark Johnson	0.2	\$1,150	\$230	email coms w/ /COC re approach to filing depo transcripts and confidentiality . sealing issues	Class Certification
8/13/2021	Mark Johnson	3.2	\$1,150	\$3,680	draft Steyer declaration summarizing decs from plaintiffs, class members and family members	Class Certification
8/13/2021	Mark Johnson	0.3	\$1,150	\$345	research prior correspondence w former D counsel re suspension of inspections for exhibit to GBW declaration; coms w/ GBW, EH re same	Class Certification
8/13/2021	Mark Johnson	0.4	\$1,150	\$460	calls and emails RLS re class declarations, declaration summarizing same and tables to declarations	Class Certification
8/13/2021	Mark Johnson	0.1	\$1,150	\$115	email exchanges w D Cross re status of declaration, scheduling mtg.	Class Certification
8/13/2021	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW re GBW declaration, additional exhibits, edits to brief and RLS declarations	Class Certification
8/13/2021	Mark Johnson	0.5	\$1,150	\$575	coms w/ GBW and RLS re RLS declaration summarizing class decs	Class Certification
8/13/2021	Rachel Steyer	0.2	\$750	\$150	email to GBW and MTJ wiht draft declaration for review	Class Certification
8/13/2021	Rachel Steyer	1.1	\$750	\$825	weekly meeting with co-counsel and MTJ, TCC, GBW to discuss preparations for class certification filing	Class Certification
8/13/2021	Rachel Steyer	0.2	\$750	\$150	phone call with GBW to review tables and declaration	Class Certification
8/13/2021	Rachel Steyer	0.2	\$750	\$150	phone call with MTJ to discuss preparing chart and tables	Class Certification
8/13/2021	Rachel Steyer	0.4	\$750	\$300	compiling email to GBW and MTJ detailing number of declarant citations for each category	Class Certification
8/13/2021	Rachel Steyer	0.5	\$750	\$375	preparing appendix of putative class member and fact witness declarations	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/13/2021	Rachel Steyer	0.2	\$750	\$150	email to GBW and MTJ circulating tables to include in appendix	Class Certification
8/13/2021	Rachel Steyer	0.3	\$750	\$225	email to GBW and MTJ providing list of Brookdale facilities represented in declarations	Class Certification
8/13/2021	Rachel Steyer	0.2	\$750	\$150	reviewing and incorporating MTJ edits to draft declarations	Class Certification
8/13/2021	Rachel Steyer	0.3	\$750	\$225	editing and formatting declaration appendix	Class Certification
8/13/2021	Rachel Steyer	4.0	\$750	\$3,000	reviewing declarations and updating spreadsheet/fact chart to correspond to brief fact statements	Class Certification
8/13/2021	Rachel Steyer	1.2	\$750	\$900	preparing tables to accompnay declaration and class member declaration appendix	Class Certification
8/13/2021	Rachel Steyer	0.5	\$750	\$375	updating and reviewing RLS declaration introducing declaration appendix	Class Certification
8/13/2021	Rachel Steyer	0.6	\$750	\$450	communications on teams with NRD, TCP, NCN, PXM re ongonig outreach and assignments	Class Outreach and Contact
8/13/2021	Travis Close	0.2	\$850	\$170	Email to GBW, MTJ re: final version of june kailes declaration forthcoming	Case Organization, Planning and Strategy
8/13/2021	Travis Close	0.4	\$850	\$340	Analyze Kailes cites in brief for insertion of discussion re: supplemental emergency plans	Case Organization, Planning and Strategy
8/13/2021	Travis Close	0.7	\$850	\$595	Analyze supplemental disaster plans to determine whether any procedures for evaucating residents with mobiliy disabilities and vision impairments are included	Case Organization, Planning and Strategy
8/13/2021	Travis Close	0.7	\$850	\$595	Research date of construction for central whittier faciliy using Brookdale production, DSS production, & online records from Whittier Building Department	Case Organization, Planning and Strategy
8/13/2021	Travis Close	1.4	\$850	\$1,190	Further edits to june kailes declaration iso class cert	Class Certification
8/13/2021	Travis Close	0.2	\$850	\$170	Email to June Kailes re: additional edits to declaration iso class cert	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/13/2021	Travis Close	1.0	\$850	\$850	Class cert meeting with MTJ, GBW, RLS, and co-counsel re: litigation strategy, expert declarations progress, brief progress, class member declarations, etc	Class Certification
8/13/2021	Travis Close	0.2	\$850	\$170	Call with GBW re: additional edits made to Kailes declaration re: supp disaster plans	Class Certification
8/13/2021	Travis Close	0.8	\$850	\$680	Additional edits to June Kailes Dec iso class cert (supp emergency and disaster plans)	Class Certification
8/13/2021	Travis Close	0.9	\$850	\$765	Amend section II.B. of brief to add cites and exhibits for GBW declaration	Class Certification
8/13/2021	Travis Close	0.3	\$850	\$255	Review and analyze edits to kailes declaration by bbk	Class Certification
8/13/2021	Travis Close	0.2	\$850	\$170	Review and analyze revisions to Kailes dec from GBW	Experts (Including Retention)
8/13/2021	Travis Close	0.6	\$850	\$510	Additions to list of docs relied upon for Doug Cross declaration	Experts (Including Retention)
8/13/2021	Travis Close	0.2	\$850	\$170	Email to MTJ re: list of docs relied upon by doug cross	Experts (Including Retention)
8/14/2021	Guy Wallace	2.2	\$1,350	\$2,970	review and analysis of Schroyer Declaration; revise and edit same; com's with Marks; JT; MTJ; GG re same	Class Certification
8/14/2021	Guy Wallace	2.4	\$1,350	\$3,240	revise and edit class cert brief	Class Certification
8/14/2021	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of further draft of Flores re class certification	Class Certification
8/14/2021	Guy Wallace	0.7	\$1,350	\$945	review and analysis of draft of proposed class cert order; com's with AX re same	Class Certification
8/14/2021	Mark Johnson	1.0	\$1,150	\$1,150	Video call w/ expert D Cross and TCC re expert declaration iso class cert	Class Certification
8/14/2021	Mark Johnson	0.9	\$1,150	\$1,035	review and edit draft declaration of D Cross iso class certification on transporation issue	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/14/2021	Mark Johnson	1.5	\$1,150	\$1,725	work on alternative language for Cross declartion re transfer requirement based on video call w/ DC, TCC	Class Certification
8/14/2021	Mark Johnson	6.0	\$1,150	\$6,900	work on GBW declaration iso class cert, including location and review of potential exhibits; drafting descriptions and reconciling Bstes numbers.	Class Certification
8/14/2021	Rachel Steyer	1.1	\$750	\$825	reviewing named plaintiff declarations, updating chart to be used for appendix tables	Class Certification
8/14/2021	Rachel Steyer	1.5	\$750	\$1,125	continuing to update and fill in chart and tables for declaration appendix	Class Certification
8/14/2021	Travis Close	0.6	\$850	\$510	Further edits and additions to Kailes declaration in accordance to proposed change by GBW and BBK; final read-through	Case Organization, Planning and Strategy
8/14/2021	Travis Close	0.3	\$850	\$255	Compare changes to 2018 and 2020 Fleet Safety Policies	Class Certification
8/14/2021	Travis Close	0.2	\$850	\$170	Email to AXU re: inclusion of multiple Fleet Safety Policies in Wallace dec	Class Certification
8/14/2021	Travis Close	0.3	\$850	\$255	Review and analyze further edits to Kailes declaration by Kailes	Experts (Including Retention)
8/14/2021	Travis Close	0.7	\$850	\$595	Analyze further edits to Cross declaration by Cross + MTJ	Experts (Including Retention)
8/14/2021	Travis Close	1.0	\$850	\$850	Meeting with doug cross, MTJ re: further revisions to Cross declaration	Experts (Including Retention)
8/14/2021	Travis Close	0.4	\$850	\$340	Revisions to List of Documents Considered for Cross report	Experts (Including Retention)
8/14/2021	Travis Close	0.2	\$850	\$170	Email to MTJ, GBW, DJC re: revised list of Docs considered in expert report	Experts (Including Retention)
8/14/2021	Travis Close	0.2	\$850	\$170	Email to MTJ re: latest CV for doug cross	Experts (Including Retention)
8/15/2021	Guy Wallace	1.9	\$1,350	\$2,565	review and analysis of further draft of Flores declaration re class certification; revise and edit same; com's with DTM and JT re same (.1)	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/15/2021	Guy Wallace	6.1	\$1,350	\$8,235	revise and edit class cert brief	Class Certification
8/15/2021	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ re Cross and Steyer declarations re class cert	Class Certification
8/15/2021	Guy Wallace	0.4	\$1,350	\$540	revise and edit declaration of Marks re class certification	Class Certification
8/15/2021	Guy Wallace	1.2	\$1,350	\$1,620	review and analysis of draft Steyer declaration; revise and edit same; com's with MTJ; RLS re same	Class Certification
8/15/2021	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of proposed edits to class cert brief; statement of facts; com's with MTJ re same (.4)	Class Certification
8/15/2021	Guy Wallace	0.6	\$1,350	\$810	revise and edit proposed Order re class certification; com's with AXI MTJ re same (.1)	Class Certification
8/15/2021	Rachel Steyer	0.6	\$750	\$450	call with class member declarant to finalize declaration, prepared and sent for signature	Class Certification
8/15/2021	Rachel Steyer	0.5	\$750	\$375	phone call with class member declarant, conducted read through, sent for signature	Class Certification
8/15/2021	Rachel Steyer	0.5	\$750	\$375	phone call with class member declarant to review and finalize declaration, sending for signature	Class Certification
8/15/2021	Rachel Steyer	1.2	\$750	\$900	phone call with class member declarant to review and finalize declaration, prepared and sent for signature	Class Certification
8/15/2021	Rachel Steyer	0.6	\$750	\$450	editing and updating declaration to be submitted with MPA ISO class cert brief	Class Certification
8/15/2021	Rachel Steyer	1.0	\$750	\$750	editing and updating declaration tables	Class Certification
8/15/2021	Travis Close	1.1	\$850	\$935	Apply proposed redactions to June Kailes declaration and send to team	Case Organization, Planning and Strategy
8/15/2021	Travis Close	0.2	\$850	\$170	email to MTJ re: sending all three versions of fleet safety policy	Case Organization, Planning and Strategy
8/15/2021	Travis Close	0.9	\$850	\$765	Further revisions to List of Documents Considered in Cross declaration	Class Certification
8/15/2021	Travis Close	0.2	\$850	\$170	Email to MTJ, GBW re: revised List of docs considered + exhibit C	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/15/2021	Travis Close	0.3	\$850	\$255	Call with June Kailes re: signing off on final declaration	Class Certification
8/15/2021	Travis Close	1.4	\$850	\$1,190	Final revisions and edits to Kailes declaration before finalizing and readying for signature	Class Certification
8/15/2021	Travis Close	0.3	\$850	\$255	Email to co-counsel re: ideas and criteria for redactions	Class Certification
8/15/2021	Travis Close	0.4	\$850	\$340	Final review of Doug Cross declaration	Class Certification
8/16/2021	Guy Wallace	6.1	\$1,350	\$8,235	revise and edit motion for class certification	Class Certification
8/16/2021	Guy Wallace	0.7	\$1,350	\$945	team ZOOM re preparation of brief, motion to seal, expert declarations	Class Certification
8/16/2021	Guy Wallace	0.3	\$1,350	\$405	revise and edit Declaration of Marks	Class Certification
8/16/2021	Guy Wallace	0.8	\$1,350	\$1,080	com's with MTJ re preparation of brief; Mastin and Waters draft declarations; proposed edits from Marks; motion to seal	Class Certification
8/16/2021	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of draft Waters and Mastin Declarations; com's with Waters and Mastin re same	Experts (Including Retention)
8/16/2021	Guy Wallace	0.5	\$1,350	\$675	com's with Kennedy and Petite re draft declaration	Experts (Including Retention)
8/16/2021	Mark Johnson	0.8	\$1,150	\$920	team mtg on status docs to be filed as part of mtn iso class cert, assignments and filing logistics.	Class Certification
8/16/2021	Mark Johnson	0.6	\$1,150	\$690	draft edits to introduction to tables to declaration	Class Certification
8/16/2021	Mark Johnson	0.5	\$1,150	\$575	coms (email and phone) w/ RLS and RBGG staff re status and revisions to Steyer declaration and tables, cite checking same.	Class Certification
8/16/2021	Mark Johnson	0.3	\$1,150	\$345	review and analyze draft mtn to seal and declarations iso of motion, com w/ AX re same	Class Certification
8/16/2021	Mark Johnson	10.0	\$1,150	\$11,500	work on revisions and inserts to brief iso mtn for class cert and draft GBW declaration and reconciling cites in brief with references to exhibits in declaration coms w.RBGG staff re same and pulling of exhibits.	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/16/2021	Rachel Steyer	0.7	\$750	\$525	meeting with RBGG cocounsel and TCC, MTJ, GBW to discuss remaining assignmnets for upcomign class cert filing	Class Certification
8/16/2021	Rachel Steyer	0.2	\$750	\$150	call with MTJ regarding finalizing declaration	Class Certification
8/16/2021	Rachel Steyer	0.3	\$750	\$225	phone call with co-counsel to discuss final declaration and cite check	Class Certification
8/16/2021	Rachel Steyer	0.5	\$750	\$375	editing and updating class cert declaration	Class Certification
8/16/2021	Rachel Steyer	0.9	\$750	\$675	reviewing and finalizing declaration	Class Certification
8/16/2021	Rachel Steyer	2.5	\$750	\$1,875	finalizing citation tables, incorporating team's cite checks and updating and reviewing tables for accuracy	Class Certification
8/16/2021	Rachel Steyer	1.1	\$750	\$825	updating and finalzing draft of declaration to incorporate final tally of numbers	Class Certification
8/16/2021	Rachel Steyer	0.3	\$750	\$225	communications on teams with NCN, NRD, TCP, RAG re ongoing outreach assignments, finalizing declarations, cite checks	Class Outreach and Contact
8/16/2021	Travis Close	0.2	\$850	\$170	review and analyze lastest checklist for class cert filing	Case Organization, Planning and Strategy
8/16/2021	Travis Close	0.3	\$850	\$255	review and analyze signed version (final) of dale schroyer	Class Certification
8/16/2021	Travis Close	0.2	\$850	\$170	Review and analyze proposed redactions for Cross declaration	Class Certification
8/16/2021	Travis Close	0.7	\$850	\$595	Team meeting re: progress on class certification: inspection report review, expert declarations, class member decs	Class Certification
8/16/2021	Travis Close	0.4	\$850	\$340	Meet w/ LEC re: assignment for redactions	Class Certification
8/16/2021	Travis Close	0.4	\$850	\$340	Review and analyze proposed additional redactions to Kailes declaration by BMU	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/16/2021	Travis Close	0.6	\$850	\$510	Review and analyze declaration of RLS + table of summarized testimony + appendix of class member declarations	Class Certification
8/16/2021	Travis Close	0.3	\$850	\$255	Review and analyze proposed redactions by BMU and AXU for Schroyer declaration	Class Certification
8/16/2021	Travis Close	0.7	\$850	\$595	Additional edits and revisions to Brookdale Tracy inspection report	Class Certification
8/16/2021	Travis Close	0.2	\$850	\$170	Email to JY re: photo reports for redaction	Class Certification
8/16/2021	Travis Close	0.6	\$850	\$510	Review and analyze photo report for Tracy facility for resident personally identifiable information; redact as appropriate	Class Certification
8/16/2021	Travis Close	0.5	\$850	\$425	Review and analyze draft Wallace dec iso class cert & check exhibits listed for accuracy	Class Certification
8/16/2021	Travis Close	0.2	\$850	\$170	Email to JY re: edits to brookdale tracy inspection report	Experts (Including Retention)
8/17/2021	Guy Wallace	5.9	\$1,350	\$7,965	revise and edit class cert brief	Class Certification
8/17/2021	Guy Wallace	1.8	\$1,350	\$2,430	revise and edit declaration of GBW re class certification	Class Certification
8/17/2021	Guy Wallace	0.7	\$1,350	\$945	review and analysis of further draft of Kennedy Declaration; revise and edit same; com's with LP re same	Class Certification
8/17/2021	Guy Wallace	0.9	\$1,350	\$1,215	team ZOOMs re preparation of brief; declarations; redactions of same	Class Certification
8/17/2021	Guy Wallace	2.3	\$1,350	\$3,105	review and analysis of draft Waters declaration re class certification; revise and edit same; com's with Waters re same (.4)	Class Certification
8/17/2021	Guy Wallace	1.5	\$1,350	\$2,025	review and analysis of draft of Mastin Declaration re class certification; com's with Mastin; JY; MTJ re same (.6)	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/17/2021	Mark Johnson	0.7	\$1,150	\$805	team zoom meeting re status of docs iso class cert mtn, tasks and logistics of filing.	Class Certification
8/17/2021	Mark Johnson	0.5	\$1,150	\$575	review and edit draft GCG declaration iso mtn, review LR and protective order for same; email to COC re same.	Class Certification
8/17/2021	Mark Johnson	1.0	\$1,150	\$1,150	review brief for missing cites to expert declaration, review declaration to identify and enter appropriate cites	Class Certification
8/17/2021	Mark Johnson	10.0	\$1,150	\$11,500	work on edits and cite checks to Mastin Declaration, Wallace Declaration; conferences w COC re logistical issues, sealing motion strategy, other issues.	Class Certification
8/17/2021	Rachel Steyer	0.2	\$750	\$150	revising numebtrs in declaration, saving and combining with tables, recirculating to GBW, MTJ, TCC and cocounsel	Class Certification
8/17/2021	Rachel Steyer	0.6	\$750	\$450	meeting with cocounsel and TCC, GBW, MTJ to review outstanding assignments for filing MPA ISO class cert	Class Certification
8/17/2021	Rachel Steyer	0.2	\$750	\$150	call with co-counsel to double check status of filing	Class Certification
8/17/2021	Rachel Steyer	3.2	\$750	\$2,400	conducting fact checking of citations in MPA ISO class cert, making edits to GBW declaration	Class Certification
8/17/2021	Rachel Steyer	0.2	\$750	\$150	updating declaration incorporating changes to omit reference to FREs, recirculating to cocounsel and GBW, MTJ, TCC	Class Certification
8/17/2021	Rachel Steyer	1.8	\$750	\$1,350	conducting research on applicability of FRE 611(a) and whether appropriate to reference in declaration compiling and introducing tables and citations to putative class member and family member declarations	Class Certification
8/17/2021	Rachel Steyer	0.6	\$750	\$450	meeting with co-counsel and TCC, MTJ, GBW to review final list of tasks and outstanding documents to prepare for filing	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/17/2021	Rachel Steyer	0.2	\$750	\$150	communications on teams with NRD and NCN concerning last minute tasks to assist with reviewing declaration appendix	Class Certification
8/17/2021	Rachel Steyer	0.2	\$750	\$150	conducted bates range check for paragraph in GBW decl as circulated by MTJ, sent edits to GBW, TCC, MTJ and co-counsel	Class Certification
8/17/2021	Travis Close	0.7	\$850	\$595	Team meeting re: class cert filing & finalization -- cite checking, editing declarations, etc	Class Certification
8/17/2021	Travis Close	0.6	\$850	\$510	Review and analyze final draft of Kennedy declaration iso class cert	Class Certification
8/17/2021	Travis Close	0.2	\$850	\$170	Review instructions for cite checking assignment & review attachments	Class Certification
8/17/2021	Travis Close	0.5	\$850	\$425	Review and analyze latest draft of brief iso class cert	Class Certification
8/17/2021	Travis Close	1.8	\$850	\$1,530	Cite-checking brief iso class certification (pages 20-27)	Class Certification
8/17/2021	Travis Close	0.2	\$850	\$170	Review and analyze depo excerpts pulled for brief iso class cert	Class Certification
8/17/2021	Travis Close	0.3	\$850	\$255	Analyze updated comprehensive filing checklist for brief + attachments	Class Certification
8/17/2021	Travis Close	0.6	\$850	\$510	Review and analyze prior versions of Marquis declaration & correspondence to confirm methodology of culling agreements outside of class period	Class Certification
8/17/2021	Travis Close	0.2	\$850	\$170	Email to GBW re: issues with counting residents with mobility & vision disabilities in class	Class Certification
8/17/2021	Travis Close	0.6	\$850	\$510	Team meeting re: redactions issue; progress of Wallace declaration; sealing motion	Class Certification
8/17/2021	Travis Close	0.8	\$850	\$680	Review and analyze errata submitted for Garner deposition	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/17/2021	Travis Close	1.3	\$850	\$1,105	Legal research re: standard for challenging deposition errata changes (ninth circuit)	Depositions
8/17/2021	Travis Close	0.4	\$850	\$340	Analyze Def's ROG responses for number of new facilities constructed	Discovery (Non-Deposition)
8/18/2021	Guy Wallace	2.4	\$1,350	\$3,240	revise and edit motion for class certification	Class Certification
8/18/2021	Guy Wallace	3.5	\$1,350	\$4,725	review and analysis of motion for class certification including brief; Steyer Declaration; Appendix of fact witness declarations; Mastin Declaration; GBW declaration; revise and edit same; com's with team re same	Class Certification
8/18/2021	Mark Johnson	1.0	\$1,150	\$1,150	continue to review brief for missing cites to expert declaration, review declaration to identify and enter appropriate cites	Class Certification
8/18/2021	Rachel Steyer	0.3	\$750	\$225	meeting with co-counsel and GBW, MTJ, TCC to review outstanding tasks before filing class cert motion	Class Certification
8/18/2021	Rachel Steyer	0.2	\$750	\$150	revising list to be used for appendix of declarations	Class Certification
8/18/2021	Rachel Steyer	0.2	\$750	\$150	phone call with MTJ to review updating declaration appendix and formatting	Class Certification
8/18/2021	Travis Close	0.3	\$850	\$255	Review and analyze preliminary redactions made to brief iso class cert	Class Certification
8/18/2021	Travis Close	0.2	\$850	\$170	Analyze revised filing checklist (final)	Class Certification
8/18/2021	Travis Close	0.4	\$850	\$340	Review and analyze latest draft of brief iso class cert (GBW draft)	Class Certification
8/18/2021	Travis Close	0.3	\$850	\$255	Meeting re: class cert filings due today; TOA/TOC; redactions needed;	Class Certification
8/18/2021	Travis Close	0.8	\$850	\$680	Proofread final ver of Dec of GBW to be filed under seal	Class Certification
8/18/2021	Travis Close	0.3	\$850	\$255	Review and analyze proposed order iso class cert w/ classes	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/18/2021	Travis Close	0.4	\$850	\$340	Review and analyze final ver of Dec of David Marks iso class cert	Class Certification
8/18/2021	Travis Close	0.6	\$850	\$510	Review and analyze exhibits to Jeff Mastin dec to verify redactions made to photos	Class Certification
8/18/2021	Travis Close	0.4	\$850	\$340	Review exhibits to Waters declaration to verify redactions were applied	Class Certification
8/19/2021	Guy Wallace	0.5	\$1,350	\$675	review and analysis of proposed order; com's with CJH re same	Class Certification
8/19/2021	Guy Wallace	1.7	\$1,350	\$2,295	preparation of task list re further discovery tasks and steps in anticipation of D's opposition and reply re class certification	Class Certification
8/19/2021	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW re follow up actions after filing class cert motion; expert disclosures, strategies for additonal discovery.	Case Organization, Planning and Strategy
8/19/2021	Mark Johnson	0.7	\$1,150	\$805	download and review as-filed declarations from Waters and Mastin w/ list of docs and data considered. draft email to both describing disclosure obligations and seeking input re same.	Class Certification
8/19/2021	Mark Johnson	0.4	\$1,150	\$460	download and review as-filed class cert brief and D Cross declaration, draft email to same descirbing disclosure obigation and seeking information for same.	Class Certification
8/19/2021	Rachel Steyer	4.0	\$750	\$3,000	reviewing expert witness declarations and compiling expert disclosures	Discovery (Non-Deposition)
8/19/2021	Travis Close	1.3	\$850	\$1,105	Legal research re: timing and content necessary for FRCP rule 26 expert disclosures	Experts (Including Retention)
8/19/2021	Travis Close	1.4	\$850	\$1,190	Begin drafting assignment for completing expert disclosures due next week	Experts (Including Retention)
8/19/2021	Travis Close	0.7	\$850	\$595	Review and analyze decs of Flores, Schroyer, and Marks to compile list of publications in past 10 years	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/19/2021	Travis Close	0.7	\$850	\$595	Review and analyze decs of Mastin, Waters, Cross, and Kailes to compile list of publications in past 10 years	Experts (Including Retention)
8/19/2021	Travis Close	1.2	\$850	\$1,020	Legal research re: what types of "exhibits" created by experts are required to be disclosed	Experts (Including Retention)
8/20/2021	Guy Wallace	0.7	\$1,350	\$945	legal research and analysis re access standards and enforceability through the Unruh Act	Misc. Research
8/20/2021	Mark Johnson	0.8	\$1,150	\$920	email exchanges w/ RLS and TCC re identification of documents cosnidered by experts for declaratioms iso mtn for class cert to be identified and or prodced; review list prepared by RLS and edits by TCC, request additional research	Experts (Including Retention)
8/20/2021	Rachel Steyer	1.6	\$750	\$1,200	reviewing plaintiffs expert witness declarations, updating list of sources and documents informing opinions, circulating to MTJ	Discovery (Non-Deposition)
8/20/2021	Travis Close	1.5	\$850	\$1,275	CA department of justice --- download and start review of addition 7.6 of files inadvertendly left out of previous production by CDSS	Discovery (Non-Deposition)
8/20/2021	Travis Close	0.9	\$850	\$765	Research re: all publications by June Kailes in past 5 years	Experts (Including Retention)
8/20/2021	Travis Close	0.9	\$850	\$765	Edits to outline re: facts and data considered by expert June Kailes in forming opinions	Experts (Including Retention)
8/20/2021	Travis Close	0.2	\$850	\$170	email to RLS re: outline edited with experts' list of facts and material relied upon	Experts (Including Retention)
8/20/2021	Travis Close	1.2	\$850	\$1,020	Leagl research re: meaning of "exhibits" summarized in expert disclosures	Experts (Including Retention)
8/21/2021	Mark Johnson	0.2	\$1,150	\$230	com w/ Thornton and Marks re obligation to produce materials considered by experts and and produce same.	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/23/2021	Guy Wallace	0.7	\$1,350	\$945	com's with DTM; JT; MTJ; RLS re preparation of production to D's of expert witness materials	Discovery (Non-Deposition)
8/23/2021	Mark Johnson	0.5	\$1,150	\$575	conference call w/ June Kailes and TCC re discloswres in connection with class cert declaration	Class Certification
8/23/2021	Mark Johnson	3.8	\$1,150	\$4,370	work on letter to OC re disclosures for each of experts	Class Certification
8/23/2021	Mark Johnson	0.3	\$1,150	\$345	call w/ TCC re expert disclosures for Mastin and Waters re class cert declarations	Experts (Including Retention)
8/23/2021	Mark Johnson	0.9	\$1,150	\$1,035	call w/ Marks, Thornton, Wallace and Styer re disclosures for class cert declarations for Schroyer and Flores	Experts (Including Retention)
8/23/2021	Mark Johnson	1.5	\$1,150	\$1,725	review Flores, Kailes, Kennedy, Cross and Schroyer declarations for prep of ltr to OC identifying docs considered and other disclosures.	Experts (Including Retention)
8/23/2021	Rachel Steyer	0.9	\$750	\$675	meeting with co-counsel to discuss documents and data used by experts in declarations ISO class cert	Experts (Including Retention)
8/23/2021	Rachel Steyer	5.2	\$750	\$3,900	assisting TCC in listing docs for experts	Experts (Including Retention)
8/23/2021	Travis Close	0.5	\$850	\$425	Review and analyze architectural docs produced by Brookdale for North Tarzana facility	Discovery (Non-Deposition)
8/23/2021	Travis Close	0.4	\$850	\$340	Review and analyze architectural documents produced by Brookdale for Oceanside facility	Discovery (Non-Deposition)
8/23/2021	Travis Close	0.4	\$850	\$340	Review and analyze architectural drawings produced by Brookdale for the Riverside facility	Discovery (Non-Deposition)
8/23/2021	Travis Close	0.4	\$850	\$340	Review and analyze construction records produced by Brookdale for San Marcos facility	Discovery (Non-Deposition)
8/23/2021	Travis Close	0.3	\$850	\$255	Review and analyze construction records produced by Brookdale for Valley View facility	Discovery (Non-Deposition)
8/23/2021	Travis Close	0.3	\$850	\$255	Review and analyze construction records produced for Brookdale Walnut	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/23/2021	Travis Close	0.2	\$850	\$170	Email to JK, MTJ, GBW setting up meeting to discuss expert disclosures	Experts (Including Retention)
8/23/2021	Travis Close	0.5	\$850	\$425	Continue expert disclosures outline listing docs reviewed by experts	Experts (Including Retention)
8/23/2021	Travis Close	0.7	\$850	\$595	Meeting with June Kailes, MTJ re: expert disclosures	Experts (Including Retention)
8/23/2021	Travis Close	0.5	\$850	\$425	Call with MTJ re: strategy for gathering docs considered by Jeff and Gary to send list/outline to defendants for expert disclosures	Experts (Including Retention)
8/23/2021	Travis Close	0.4	\$850	\$340	Email to RLS re: assignment for listing docs considered by Jeff and Gary in outline	Experts (Including Retention)
8/24/2021	Guy Wallace	1.1	\$1,350	\$1,485	com's with S. Chan; Maatman; GG; MTJ re 9/15/21 mediation and preparation re same	Settlement
8/24/2021	Guy Wallace	0.8	\$1,350	\$1,080	analysis of P's position re injunctive relief and damages; preparation of letter re settlement	Settlement
8/24/2021	Mark Johnson	0.3	\$1,150	\$345	call w/ J Mastin re expert disclosures for class cert declartion	Class Certification
8/24/2021	Mark Johnson	0.6	\$1,150	\$690	call w/ TCC and RLS re compilation of Bates numbered docs considered by Mastin and Waters for expert opinions on class cert motion.	Class Certification
8/24/2021	Mark Johnson	1.0	\$1,150	\$1,150	calls x2 w/ GBW re upcoming mediation strategy and issues for mediation statment	Settlement
8/24/2021	Rachel Steyer	0.5	\$750	\$375	call with fact witness declarant to discuss possibility of speaking to the press	Class Outreach and Contact
8/24/2021	Rachel Steyer	0.4	\$750	\$300	reviewing spreadsheet circulated by RAB documenting productions	Discovery (Non-Deposition)
8/24/2021	Rachel Steyer	0.6	\$750	\$450	call with MTJ and TCC reviewing reformatting list of documents/disclosures for opposing counsel	Discovery (Non-Deposition)
8/24/2021	Rachel Steyer	0.2	\$750	\$150	double checking and updating expert disclosure documents	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/24/2021	Travis Close	1.1	\$850	\$935	Review and analyze range of blueprints/architectural records disclosed in Def's responses to Stiner ROGs, Set One	Discovery (Non-Deposition)
8/24/2021	Travis Close	0.8	\$850	\$680	Analyze and organize versions of construction history charts & tables sent to experts	Experts (Including Retention)
8/24/2021	Travis Close	1.2	\$850	\$1,020	Compile list of documents sent to both gary/jeff for expert disclosures	Experts (Including Retention)
8/24/2021	Travis Close	1.1	\$850	\$935	Review prior communications to Jeff and Gary to organize docs sent for expert disclosures	Experts (Including Retention)
8/24/2021	Travis Close	0.8	\$850	\$680	Further revisions to Outline of expert disclosures (Jeff Mastin section)	Experts (Including Retention)
8/24/2021	Travis Close	0.7	\$850	\$595	Review, analyze, and revise draft letter to opposing counsel re: expert disclosures	Experts (Including Retention)
8/24/2021	Travis Close	1.5	\$850	\$1,275	Further analysis of whether all docs produced to Jeff and Gary have been identified; email to MTJ re: same	Experts (Including Retention)
8/24/2021	Travis Close	0.6	\$850	\$510	Meet with MTJ, RLS re: strategy for Gary and Jeff's expert disclosures	Experts (Including Retention)
8/24/2021	Travis Close	0.2	\$850	\$170	Email to MTJ, RLS re: edits to expert disclosure outline	Experts (Including Retention)
8/24/2021	Travis Close	0.4	\$850	\$340	Review and analyze Def's motion for admin relief to extend time to file dec iso Ps admin motion to file under seal	Pleadings and Motions Re: Pleadings
8/25/2021	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ re D's notice of errata re depo testimony and Ninth Circuit prohibition on substantive changes to depo testimony; analysis of D's efforts to submit contradictory testimony from Bowman re various issues	Discovery (Non-Deposition)
8/25/2021	Guy Wallace	0.4	\$1,350	\$540	com's with Waters; MTJ re production of expert materials to D's	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/25/2021	Rachel Steyer	0.8	\$750	\$600	meeting with MTJ, TCC, RAB to discuss documents and expert disclosures	Experts (Including Retention)
8/25/2021	Travis Close	0.9	\$850	\$765	Additional revisions and edits to latest draft of expert disclosures outline	Case Organization, Planning and Strategy
8/25/2021	Travis Close	1.3	\$850	\$1,105	research which types of attorney work product assisting experts in reaching opinions must be disclosed per FRCP 26	Experts (Including Retention)
8/25/2021	Travis Close	1.2	\$850	\$1,020	Review and analyze prior email correspondence, firm E: drive, and Relativity for reference to CapEx plan cited in expert declarations	Experts (Including Retention)
8/25/2021	Travis Close	0.9	\$850	\$765	Review and analyze prior email correspondence, firm E: drive, and Relativity for reference to "various Brookdale Renovation status spreadsheets" cited in expert declarations	Experts (Including Retention)
8/25/2021	Travis Close	0.6	\$850	\$510	Review and analyze prior email correspondence, firm E: drive, and Relativity for reference to "2017 budget projects" cited in expert declarations	Experts (Including Retention)
8/25/2021	Travis Close	0.5	\$850	\$425	Email to MTJ, RLS, RAB with analysis of results found for capex, brookdale renovation status spreadsheets, and 2017 budget projects docs cited by experts in declaration	Experts (Including Retention)
8/25/2021	Travis Close	0.8	\$850	\$680	Team meeting w/ MTJ, RLS, RAB re: finalizing expert disclosures	Experts (Including Retention)
8/25/2021	Travis Close	0.8	\$850	\$680	Analyze prior email correspondence to determine whether certain docs were shared with experts: construction history summaries, buildings & alterations spreadsheet, riverside county spreadsheet, & table of building construction dates	Experts (Including Retention)
8/25/2021	Travis Close	0.8	\$850	\$680	Final review of Mastin/Waters city-produced docs to ensure consistency with disclosure sheet to defendants	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/25/2021	Travis Close	0.2	\$850	\$170	Call with MTJ re: reivew of docs sent to Kailes and consistency with expert disclosure list	Experts (Including Retention)
8/25/2021	Travis Close	0.2	\$850	\$170	Call with RLS re: doublechecking docs listed on disclosure sheet for Gary Waters compared to docs sent to him on OneDrive	Experts (Including Retention)
8/26/2021	Rachel Steyer	0.2	\$750	\$150	call with MTJ to discuss process of obtaining authorizations from declarants	Discovery (Non-Deposition)
8/26/2021	Rachel Steyer	0.2	\$750	\$150	call with fact witness declarant about documents needed for authorization	Discovery (Non-Deposition)
8/26/2021	Rachel Steyer	0.2	\$750	\$150	call with fact witness declarant to notify and discuss authorization form	Discovery (Non-Deposition)
8/26/2021	Rachel Steyer	0.4	\$750	\$300	call with class member declarant discussing process of authorization	Discovery (Non-Deposition)
8/26/2021	Rachel Steyer	0.2	\$750	\$150	phone call with class member declarant explaining authorization process	Discovery (Non-Deposition)
8/26/2021	Rachel Steyer	0.2	\$750	\$150	call with class member declarant explaining authorization process	Discovery (Non-Deposition)
8/26/2021	Rachel Steyer	0.2	\$750	\$150	call with declarant discussing authorization process	Discovery (Non-Deposition)
8/26/2021	Rachel Steyer	2.6	\$750	\$1,950	preparing draft authorization request forms for declarants	Discovery (Non-Deposition)
8/26/2021	Travis Close	1.5	\$850	\$1,275	Review and analyze resident records for Jeanette Algarne, Patricia Eidler, Lawrence Quinlan, Ralph Schmidt for evidence re: medical release form; content of resident records	Case Organization, Planning and Strategy
8/26/2021	Travis Close	0.8	\$850	\$680	Resarch statues and regulations under DSS/DHS authorizing requests for resident records at assisted living & memory care facilities	Case Organization, Planning and Strategy
8/26/2021	Travis Close	0.4	\$850	\$340	Research forms under Cal DSS to find medical release form	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/26/2021	Travis Close	0.4	\$850	\$340	Email to RLS with analysis on HSC 1569 (resident rights - release of medical records) & medical release form for class members	Case Organization, Planning and Strategy
8/26/2021	Travis Close	0.2	\$850	\$170	Call to MTJ re: strategy for challenging depo errata designations	Depositions
8/26/2021	Travis Close	1.4	\$850	\$1,190	Caselaw research re: "sham" rule as applied to deposition errata	Depositions
8/26/2021	Travis Close	1.1	\$850	\$935	Legal research re: what constitutes "contradictory" deposition errata changes in the Ninth Circuit	Depositions
8/26/2021	Travis Close	1.5	\$850	\$1,275	Draft memo evaluating Rule30(e) and its applicability to requested errata changes by Defendants for Bowman and Garner transcripts	Depositions
8/26/2021	Travis Close	0.6	\$850	\$510	Review and analyze requested errata changes to Bowman and Garner depositions	Depositions
8/26/2021	Travis Close	0.8	\$850	\$680	Legal research re: how strict is 30-day rule for making depo corrections in FRCP rule 30(e)	Depositions
8/27/2021	Rachel Steyer	0.3	\$750	\$225	reviewing depo errata charts prepared and circulated by TCC	Depositions
8/27/2021	Rachel Steyer	0.2	\$750	\$150	email to GBW and MTJ and cocounsel with questions about preparing and distributing declarant authorization forms	Discovery (Non-Deposition)
8/27/2021	Rachel Steyer	0.3	\$750	\$225	phone call with declarant explaining authorization process	Discovery (Non-Deposition)
8/27/2021	Rachel Steyer	0.2	\$750	\$150	phone call with declarant, explained authorization process	Discovery (Non-Deposition)
8/27/2021	Rachel Steyer	0.4	\$750	\$300	received call back from declarant, discussed authorization process	Discovery (Non-Deposition)
8/27/2021	Rachel Steyer	0.2	\$750	\$150	phone call with declarant, explained authorization process	Discovery (Non-Deposition)
8/27/2021	Rachel Steyer	0.2	\$750	\$150	call with declarant, explained authorization process	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/27/2021	Rachel Steyer	0.3	\$750	\$225	phone call with declarant, explained authorization process	Discovery (Non-Deposition)
8/27/2021	Rachel Steyer	0.2	\$750	\$150	phone call with declarant, discussed authorization process	Discovery (Non-Deposition)
8/27/2021	Rachel Steyer	0.2	\$750	\$150	phone call with declarant, explained authorization process	Discovery (Non-Deposition)
8/27/2021	Rachel Steyer	0.2	\$750	\$150	phone call with declarant, explained authorization process	Discovery (Non-Deposition)
8/27/2021	Rachel Steyer	0.3	\$750	\$225	received call back from declarant, explained authorization process	Discovery (Non-Deposition)
8/27/2021	Rachel Steyer	0.2	\$750	\$150	phone call with declarant to review authorization process	Discovery (Non-Deposition)
8/27/2021	Rachel Steyer	2.3	\$750	\$1,725	preparing declarant authorization request forms	Discovery (Non-Deposition)
8/27/2021	Travis Close	1.4	\$850	\$1,190	Analyze depo errata changes for Kevin Bowman, Topic two depo proposed by Defendants by comparing them to original depo transcript	Depositions
8/27/2021	Travis Close	1.6	\$850	\$1,360	Prepare chart with depo errata changes for Kevin Bowman, Topic two depo proposed by Defendants	Depositions
8/27/2021	Travis Close	1.5	\$850	\$1,275	Analyze depo errata changes for Sheila Garner depo proposed by Defendants by comparing them to original depo transcript and redlining changes proposed	Depositions
8/27/2021	Travis Close	1.3	\$850	\$1,105	Prepare chart with depo errata changes for Sheila Garner, depo proposed by Defendants	Depositions
8/27/2021	Travis Close	0.8	\$850	\$680	Legal research re: whether depo errata is allowed to amend answers to add further explanations	Depositions
8/27/2021	Travis Close	0.3	\$850	\$255	Email to GBW, MTJ, RLS re: findings of depo errata analyses for Bowman topic 2 and Garner	Depositions
8/30/2021	Rachel Steyer	0.2	\$750	\$150	call with declarant concerning possible retaliation	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/30/2021	Rachel Steyer	0.2	\$750	\$150	received call back from declarant, explained authorization process	Discovery (Non-Deposition)
8/30/2021	Rachel Steyer	4.5	\$750	\$3,375	preparing/drafting declarant authorization request forms	Discovery (Non-Deposition)
8/30/2021	Travis Close	1.4	\$850	\$1,190	Legal research re: whether communications with DSS re: emergency evacuation plans and procedures can be obtained through PRA requests	Case Organization, Planning and Strategy
8/30/2021	Travis Close	1.1	\$850	\$935	Analyze resident assessment & census data to determine whether we can calculate number of residents with mobility disabilities on upper floors	Case Organization, Planning and Strategy
8/30/2021	Travis Close	0.8	\$850	\$680	Analyze resident assessment data & reports from damages experts to determine percentage of residents with mobility or vision disabilities	Case Organization, Planning and Strategy
8/30/2021	Travis Close	1.3	\$850	\$1,105	Legal research re: responding to noncompliance in subpoena requests	Discovery (Non-Deposition)
8/30/2021	Travis Close	1.5	\$850	\$1,275	Analyze status of responses to subpoenas for building records & for which jurisdictions we have incomplete information	Discovery (Non-Deposition)
8/30/2021	Travis Close	1.6	\$850	\$1,360	Review and analyze video conference (forwarded from emergency evac expert) on Improving Emergency Responses For California Seniors and People with Disabilities,	Experts (Including Retention)
8/31/2021	Mark Johnson	0.2	\$1,150	\$230	call w/ RLS re process for seeking resident files for declarant depositions; form of request, tracking progress.	Discovery (Non-Deposition)
8/31/2021	Mark Johnson	0.2	\$1,150	\$230	call w/ GCG re approach to obtaining resident files for declarant depositions	Discovery (Non-Deposition)
8/31/2021	Mark Johnson	1.7	\$1,150	\$1,955	draft 5th set of document request (resident files), incorporate input from COC and finalize; serve on Ds	Discovery (Non-Deposition)
8/31/2021	Mark Johnson	0.9	\$1,150	\$1,035	draft authorization for release of resident files	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/31/2021	Mark Johnson	0.3	\$1,150	\$345	research re H&S Code section 1569.269 right to resident files.	Discovery (Non-Deposition)
8/31/2021	Rachel Steyer	0.7	\$750	\$525	meeting with co-counsel and declarant to discuss possible media appearance/interview	Class Outreach and Contact
8/31/2021	Rachel Steyer	0.3	\$750	\$225	call with MTJ about preparing authorization requests and spreadsheets	Discovery (Non-Deposition)
8/31/2021	Rachel Steyer	0.4	\$750	\$300	call with TRB re organizing chart of declarants info	Discovery (Non-Deposition)
8/31/2021	Rachel Steyer	0.2	\$750	\$150	call with TRB to review new spreadsheet	Discovery (Non-Deposition)
8/31/2021	Rachel Steyer	0.2	\$750	\$150	phone call with declarant who called back, discussed authorization process, requested copy of POA	Discovery (Non-Deposition)
8/31/2021	Rachel Steyer	0.3	\$750	\$225	email to TRB, NCN, NRD explaining outreach project for obtaining authorization request forms and POA docs	Discovery (Non-Deposition)
8/31/2021	Rachel Steyer	1.4	\$750	\$1,050	preparing chart for MTJ to include as exhibit in RFP for declarant resident files	Discovery (Non-Deposition)
8/31/2021	Rachel Steyer	0.2	\$750	\$150	email to TRB, NCN, NRD with update about organizing declarant folders/files/documents	Discovery (Non-Deposition)
8/31/2021	Rachel Steyer	2.4	\$750	\$1,800	organizing and compiling declarant documents and communications	Discovery (Non-Deposition)
8/31/2021	Travis Close	1.4	\$850	\$1,190	Review and analyze new documented visits by DSS (facility evaluation reports and complaint investigation report) for the follwoing facilities: Scotts Valley, Tracy, Citrus Heights, Irvine, Nohl Ranch, Oceanhouse, North Tarazana	Case Organization, Planning and Strategy
8/31/2021	Travis Close	1.6	\$850	\$1,360	Updated spreadsheet of Executive Directors/Admins with current EDs at Brookdale Facilities as indicated on DSS website	Case Organization, Planning and Strategy
8/31/2021	Travis Close	0.9	\$850	\$765	Analyze cases cited in GBW letter to Def's re: duty to preserve evidence	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/31/2021	Travis Close	0.8	\$850	\$680	Review client files & Relativity (ESI) for early letters to Brookdale/Defendants' counsel re: preservation of evidence	Discovery (Non-Deposition)
8/31/2021	Travis Close	1.1	\$850	\$935	Review and analyze Brookdale's production of Ambulation and Mobility Evaluation forms (Brookdale + Emeritus) to determine which info was collected at time of admission	Discovery (Non-Deposition)
8/31/2021	Travis Close	1.1	\$850	\$935	Review, analyze, and index new production received from DSS (CDSS0063416-CDSS0063614)	Discovery (Non-Deposition)
9/1/2021	Guy Wallace	2.8	\$1,350	\$3,780	preparation of settlement position re IR and damages; com's with MTJ re same and preparation for 9/15 mediation with MJ Infante	Settlement
9/1/2021	Guy Wallace	0.7	\$1,350	\$945	analysis of information from MTJ re B's financial condition; com's with PK; LP; Paul Regan re same	Settlement
9/1/2021	Mark Johnson	3.5	\$1,150	\$4,025	draft ltr for OC re request for resident files; review and revise authorization and HIPPA release; coms w/ RLS re same	Discovery (Non-Deposition)
9/1/2021	Mark Johnson	1.5	\$1,150	\$1,725	conference w/ GBW re mediation brief and strategy	Settlement
9/1/2021	Rachel Steyer	0.2	\$750	\$150	reviewing draft records release requests prepared and circulated by MTJ	Discovery (Non-Deposition)
9/1/2021	Rachel Steyer	0.2	\$750	\$150	question to MTJ and RAB re SSNs and DOBs of residents for preparing authroization forms	Discovery (Non-Deposition)
9/1/2021	Rachel Steyer	0.2	\$750	\$150	response to MTJ and RAB re question about DOBs/SSNs in HIPPA authorization forms	Discovery (Non-Deposition)
9/1/2021	Rachel Steyer	0.3	\$750	\$225	research on HIPPA authorization form requirements	Discovery (Non-Deposition)
9/1/2021	Rachel Steyer	0.3	\$750	\$225	preparing authorization request forms	Discovery (Non-Deposition)
9/1/2021	Travis Close	1.3	\$850	\$1,105	Analyze and organize floor plans & architectural records produced in new DSS production	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/1/2021	Travis Close	1.3	\$850	\$1,105	Review and analyze new DSS production for complaints by wheelchair users & residents with vision disabilities	Case Organization, Planning and Strategy
9/1/2021	Travis Close	1.4	\$850	\$1,190	Review and analyze Fire Inspection Requests from DSS files for info re: emergency evacuation plans	Class Certification
9/1/2021	Travis Close	1.1	\$850	\$935	Review, analyze, and organize new DSS production received -- # CDSS0058117-CDSS0058861	Discovery (Non-Deposition)
9/1/2021	Travis Close	1.0	\$850	\$850	Review and analyze new DSS production for fire safety evaluations of plans for people with vision disabilities	Discovery (Non-Deposition)
9/2/2021	Guy Wallace	2.3	\$1,350	\$3,105	legal research and analysis re application of Unruh Act of rental properties; Unruh Act standards re affirmative willful misconduct	Misc. Research
9/2/2021	Guy Wallace	1.2	\$1,350	\$1,620	preparation of draft letter to MJ Infante re settlement	Settlement
9/2/2021	Mark Johnson	0.5	\$1,150	\$575	coms w/ GBW, TCC re number of facilities operated by BKD and recent developments, reseawrch re same	Case Organization, Planning and Strategy
9/2/2021	Mark Johnson	0.3	\$1,150	\$345	draft emails x2 to Marks/Thornton re additonal and missing data needed, planning for additiona assesents, planning and information for mediation	Case Organization, Planning and Strategy
9/2/2021	Mark Johnson	1.5	\$1,150	\$1,725	coms w/ RLS re revisions to authorization and HIPPA forms, review finals for two residents; draft email cover for courtesy copies ot Defendants	Discovery (Non-Deposition)
9/2/2021	Mark Johnson	0.7	\$1,150	\$805	review prior emails and doc production for follow up on assessment data and PSP data missing from prior productions; draft email to OC re same	Discovery (Non-Deposition)
9/2/2021	Mark Johnson	3.4	\$1,150	\$3,910	review prior correspondence, doc requests, document producion for development of discovery plan for reply brief and tial.	Discovery (Non-Deposition)
9/2/2021	Mark Johnson	0.6	\$1,150	\$690	call w/ GBW re mediation statement, strategy for mediation, merits of claims	Settlement

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/2/2021	Mark Johnson	0.2	\$1,150	\$230	further call w/ GBW re merits of Unruh Act claim for argument at mediation	Settlement
9/2/2021	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW re injunctive relief issues.	Settlement
9/2/2021	Rachel Steyer	0.2	\$750	\$150	updating HIPAA authorization request form, circulating to MTJ	Discovery (Non-Deposition)
9/2/2021	Rachel Steyer	0.4	\$750	\$300	received call back from declarant, explained and discussed authorization process	Discovery (Non-Deposition)
9/2/2021	Rachel Steyer	0.2	\$750	\$150	email to NRD and NCN with instructions for preparing requests and HIPPA authorization request forms	Discovery (Non-Deposition)
9/2/2021	Rachel Steyer	0.3	\$750	\$225	received call back from declarant, discussed authorization request forms	Discovery (Non-Deposition)
9/2/2021	Rachel Steyer	0.2	\$750	\$150	communications with NRD and NCN on teams to review questions pertaining to declarant authorization requests	Discovery (Non-Deposition)
9/2/2021	Rachel Steyer	0.6	\$750	\$450	phone call with declarant to discuss authorization process	Discovery (Non-Deposition)
9/2/2021	Rachel Steyer	3.2	\$750	\$2,400	preparing declarant authorization forms, sending for signatures	Discovery (Non-Deposition)
9/2/2021	Rachel Steyer	0.3	\$750	\$225	updating co-counsel list of declarants corresponding to Bay Area Brookdale facilities, circulating	Misc. Research
9/2/2021	Travis Close	1.2	\$850	\$1,020	Updates to latest master facility spreadsheet with new facility divestments	Case Organization, Planning and Strategy
9/2/2021	Travis Close	0.9	\$850	\$765	Verify current facility status by checking brookdale-specific websites for each facility	Case Organization, Planning and Strategy
9/2/2021	Travis Close	0.3	\$850	\$255	Call with GCG re: how to use master facility spreadsheet	Case Organization, Planning and Strategy
9/2/2021	Travis Close	1.5	\$850	\$1,275	Analyze & organize personnel reports received in new DSS production	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/2/2021	Travis Close	1.5	\$850	\$1,275	Research new owner, licensees, and/or operators of Brookdale Salinas facility using our records, online records and DSS database	Case Organization, Planning and Strategy
9/2/2021	Travis Close	0.4	\$850	\$340	Email to MTJ re: recently divested Brookdale facilities & background on Salinas facility	Case Organization, Planning and Strategy
9/2/2021	Travis Close	0.4	\$850	\$340	Review and analyze memo by Salinas Valley Memorial re: ownership, background, and lease/sublease of Brookdale Salinas facility	Case Organization, Planning and Strategy
9/2/2021	Travis Close	1.3	\$850	\$1,105	Review, analyze, and organize new DSS production received -- # CDSS0058937-CDSS0059907	Discovery (Non-Deposition)
9/2/2021	Travis Close	0.7	\$850	\$595	Research whether emergency planning provisions must be integrated into all procurement processes under CA emergency evacuation statute (expert report)	Experts (Including Retention)
9/3/2021	Guy Wallace	0.8	\$1,350	\$1,080	legal research and analysis re application of Unruh Act to residential entities	Misc. Research
9/3/2021	Guy Wallace	0.8	\$1,350	\$1,080	com's with MTJ re preparation for mediation; further motion to compel re non-produced data	Settlement
9/3/2021	Guy Wallace	0.4	\$1,350	\$540	review and analysis of memo from LP re Brookdale financial condition; com's with GG; KAS; MTJ re same	Settlement
9/3/2021	Mark Johnson	0.6	\$1,150	\$690	call w GBW re settlement strategy and position on injunctive relief for mediation;	Case Organization, Planning and Strategy
9/3/2021	Mark Johnson	1.7	\$1,150	\$1,955	call w/ Marks and Thornton re analysis of data on HPPD for use in injunctive relief demand; missing or additional data and information needed for further staffing analysis, scope of staffing analysis	Case Organization, Planning and Strategy
9/3/2021	Mark Johnson	0.3	\$1,150	\$345	call and emails w/ RLS re direction on form of requests for resident files and status re same	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/3/2021	Mark Johnson	0.6	\$1,150	\$690	review, finalize and approve package of docs w/ ltr for delivery to OC and BKD seeking production of resident files	Discovery (Non-Deposition)
9/3/2021	Rachel Steyer	0.2	\$750	\$150	preparing drafts of declarant authorization forms to be sent via certified mail, circulated to MTJ, GBW, LEC, TBS	Communications With Opposing Counsel
9/3/2021	Rachel Steyer	0.4	\$750	\$300	preparing and organizing documents to be prepared for letter to opposing counsel	Communications With Opposing Counsel
9/3/2021	Rachel Steyer	0.2	\$750	\$150	email to LEC, MTJ, EAM, TBS finalizing scanned docs to be mailed	Communications With Opposing Counsel
9/3/2021	Rachel Steyer	0.5	\$750	\$375	communications on teams with NRD and NCN concerning preparing declarant authorization forms	Discovery (Non-Deposition)
9/3/2021	Rachel Steyer	3.2	\$750	\$2,400	preparing declarant authorization forms, sending to declarants for signature, updating sharepoint	Discovery (Non-Deposition)
9/3/2021	Rachel Steyer	0.8	\$750	\$600	reviewing NRD and NCN authorization forms to send to declarants	Discovery (Non-Deposition)
9/3/2021	Rachel Steyer	0.2	\$750	\$150	updating MTJ discover letter to OC for future declarant authorization request forms	Discovery (Non-Deposition)
9/3/2021	Rachel Steyer	0.4	\$750	\$300	preparing email to MTJ and LEC with second batch of declarant authorization forms to send to OC	Discovery (Non-Deposition)
9/3/2021	Travis Close	1.2	\$850	\$1,020	Review and analyze emergency evacuation plans produced in new DSS production	Case Organization, Planning and Strategy
9/3/2021	Travis Close	0.8	\$850	\$680	Analyze how to determine ambulatory status from DSS forms required to be completed for each resident	Case Organization, Planning and Strategy
9/3/2021	Travis Close	1.5	\$850	\$1,275	Analyze record of facility resident complaints for elevatory breakage complaints / being left on upper floors	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/3/2021	Travis Close	0.4	\$850	\$340	Review and analyze requests for copies of resident file and other records and docs pursuant to CA H&S Code 1569.269 for Buff/Brezicki, Frazin/Reiner, and Vanderheide-Gerhardt,	Discovery (Non-Deposition)
9/3/2021	Travis Close	1.3	\$850	\$1,105	Review, analyze, and organize new production of DSS files received -- CDSS0059907-CDSS0060925	Discovery (Non-Deposition)
9/3/2021	Travis Close	1.2	\$850	\$1,020	Review, analyze, and organize new production of DSS files received -- CDSS0060925-CDSS0061908	Discovery (Non-Deposition)
9/5/2021	Guy Wallace	1.8	\$1,350	\$2,430	legal research and analysis re Unruh Act and application to residential housing; senior housing; long-term care facilities	Misc. Research
9/5/2021	Guy Wallace	3.9	\$1,350	\$5,265	preparation and drafting of mediation letter brief to MJ Infante; preparation of damages estimates; com's with MTJ re same (.6)	Settlement
9/5/2021	Mark Johnson	0.6	\$1,150	\$690	call w GBW re mediation position, analysis of damages under ADA, anticipation of D's position.	Settlement
9/6/2021	Guy Wallace	1.2	\$1,350	\$1,620	legal research and analysis re Unruh Act and injunctive relief	Misc. Research
9/6/2021	Guy Wallace	1.6	\$1,350	\$2,160	preparation and drafting of letter to MJ Infante re settlement	Settlement
9/6/2021	Guy Wallace	1.5	\$1,350	\$2,025	preparation and drafting of letter to MJ Infante re settlement; section re damages; com's with MTJ re same (.5)	Settlement

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/6/2021	Mark Johnson	0.5	\$1,150	\$575	further discussion w/ GBW re mediation and calculation of maximum damages, strategy for presenting same in mediation brief or at mediation	Settlement
9/6/2021	Rachel Steyer	2.6	\$750	\$1,950	reviewing and organizing declarant documents and records	Discovery (Non-Deposition)
9/6/2021	Rachel Steyer	0.2	\$750	\$150	email to NCN and NRD with instructions for ongoing outreach assignment	Discovery (Non-Deposition)
9/7/2021	Guy Wallace	6.8	\$1,350	\$9,180	preparation and drafting of letter to MJ Infante re settlement	Settlement
9/7/2021	Guy Wallace	1.4	\$1,350	\$1,890	com's with GG; KAS; DTM; MTJ re settlement and preparation for 9/15 mediation with MJ Infante	Settlement
9/7/2021	Mark Johnson	1.6	\$1,150	\$1,840	review, edit draft mediation brief and com w/ GBW re same	Settlement
9/8/2021	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re standard for intentionality re access violations under the Unruh Act	Misc. Research
9/8/2021	Guy Wallace	1.1	\$1,350	\$1,485	legal research and analysis re what standard of intentionality must be proven to establish a claim under the Unruh Act for disability access violations of Title 24 and other CA laws and regulations	Misc. Research
9/8/2021	Guy Wallace	1.6	\$1,350	\$2,160	preparation and drafting of letter to MJ Infante re settlement; revise and edit same; com's with DTM; JY; MTJ re same	Settlement
9/8/2021	Guy Wallace	2.8	\$1,350	\$3,780	revise and edit letter to MJ Infante re settlement	Settlement
9/8/2021	Mark Johnson	0.2	\$1,150	\$230	call from Tom Goodwin, VP litigation re statutory request for resident files.	Discovery (Non-Deposition)
9/8/2021	Mark Johnson	0.3	\$1,150	\$345	call w/ RLS re status of resident file request project, additional authorizations, plan going forward	Discovery (Non-Deposition)
9/8/2021	Mark Johnson	1.0	\$1,150	\$1,150	review authorizations for release of resident files, letter to Brookdale officials, coms w/ Eric Morgan re same and draft letter to OC re same.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/8/2021	Mark Johnson	1.0	\$1,150	\$1,150	draft email to Thornton, Marks re missing assessment data and issues raised by Ds email concerning same. research prior correspondence for same	Discovery (Non-Deposition)
9/8/2021	Mark Johnson	0.4	\$1,150	\$460	draft emails to experts Waters and Mastin re development of construction history, timing of and preparation for depositions	Discovery (Non-Deposition)
9/8/2021	Mark Johnson	2.7	\$1,150	\$3,105	draft section of joint discovery letter on missing assessment data	Other Motions
9/8/2021	Mark Johnson	0.5	\$1,150	\$575	call w/ GBW re mediation statement, edits to same, settlement strategy, damages analysis.	Settlement
9/8/2021	Rachel Steyer	0.3	\$750	\$225	reviewing authorization scans to be sent to opposing counsel	Communications With Opposing Counsel
9/8/2021	Rachel Steyer	0.3	\$750	\$225	call with MTJ to discuss declarant authorization project	Discovery (Non-Deposition)
9/8/2021	Rachel Steyer	0.2	\$750	\$150	call with NRD and NCN to discuss status of authorization project	Discovery (Non-Deposition)
9/8/2021	Rachel Steyer	0.2	\$750	\$150	reviewing NCN prepared authorization forms	Discovery (Non-Deposition)
9/8/2021	Rachel Steyer	0.5	\$750	\$375	reviewing NCN prepared authorization forms	Discovery (Non-Deposition)
9/8/2021	Rachel Steyer	0.2	\$750	\$150	communications on teams with NRD and NCN regarding preparing and finalizing authorization forms	Discovery (Non-Deposition)
9/8/2021	Rachel Steyer	1.1	\$750	\$825	gathering and preparing authorization forms with POAs and updating MTJ cover letter to send to OC	Discovery (Non-Deposition)
9/8/2021	Rachel Steyer	1.2	\$750	\$900	reviewing and organizing declarant documents	Discovery (Non-Deposition)
9/9/2021	Guy Wallace	0.9	\$1,350	\$1,215	preparation of mediation submission; com's with Chan; MTJ; LEC re same	Settlement
9/9/2021	Mark Johnson	0.5	\$1,150	\$575	call w/ GBW re mediation, discovery plan	Case Organization, Planning and Strategy
9/9/2021	Mark Johnson	0.3	\$1,150	\$345	call w/ Stacia Stiner re recent developments at facility, mediation, class cert motion, depo prep	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/9/2021	Mark Johnson	0.1	\$1,150	\$115	call w/ Stacia Stiner re recent developments at facility, mediation, class cert motion, depo prep	Case Organization, Planning and Strategy
9/9/2021	Mark Johnson	2.0	\$1,150	\$2,300	work on additional discovery plan, reserach	Case Organization, Planning and Strategy
9/9/2021	Mark Johnson	0.7	\$1,150	\$805	review requests and authorizations for another 10 resident files; review and edit cover letter	Discovery (Non-Deposition)
9/9/2021	Mark Johnson	0.5	\$1,150	\$575	email exchanges w/ GLM re resident file requests.	Discovery (Non-Deposition)
9/9/2021	Rachel Steyer	0.2	\$750	\$150	reviewing scans and MTJ cover letter to be sent to opposing counsel	Communications With Opposing Counsel
9/9/2021	Rachel Steyer	0.4	\$750	\$300	reviewing NCN prepared authorizations	Discovery (Non-Deposition)
9/9/2021	Rachel Steyer	0.4	\$750	\$300	received call from declarant, discussed sending signed copy of authorization and question about complaining to state licensing agencesi	Discovery (Non-Deposition)
9/9/2021	Rachel Steyer	3.7	\$750	\$2,775	preparing and sending declarant authorization forms	Discovery (Non-Deposition)
9/9/2021	Rachel Steyer	0.3	\$750	\$225	preparing and combining authorization and declarant POA documents	Discovery (Non-Deposition)
9/9/2021	Rachel Steyer	0.7	\$750	\$525	reviewing NRD prepared authoriztaion forms	Discovery (Non-Deposition)
9/9/2021	Rachel Steyer	1.3	\$750	\$975	organizing and gathering declarant documents, reviewing Brookdale production	Discovery (Non-Deposition)
9/10/2021	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ; RAB re discovery and next steps re preparation for depositions of class cert declarants	Discovery (Non-Deposition)
9/10/2021	Rachel Steyer	1.4	\$750	\$1,050	preparing and organizing next batch of signed declarant authorization, checking for POA docs, updating MTJ cover letter to circulate to opposing counsel, all sent to MTJ for review and approval	Communications With Opposing Counsel
9/10/2021	Rachel Steyer	0.3	\$750	\$225	updating cover letter for MTJ to circulate to opposing counsel	Communications With Opposing Counsel
9/10/2021	Rachel Steyer	0.2	\$750	\$150	updating MTJ cover letter and providing signed declarant authorizations and POA docs to send to opposing counsel	Communications With Opposing Counsel

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/10/2021	Rachel Steyer	0.2	\$750	\$150	response to RAB, TCC, GBW, MTJ regarding organizing files and searching production for declarants	Discovery (Non-Deposition)
9/10/2021	Rachel Steyer	0.2	\$750	\$150	updating declarant and resident list to circulate to GBW, RAB, MTJ, TCC	Discovery (Non-Deposition)
9/10/2021	Rachel Steyer	0.2	\$750	\$150	phone call with declarant, reminded her to sign authorization, discussed looking for POA	Discovery (Non-Deposition)
9/10/2021	Rachel Steyer	0.4	\$750	\$300	call with declarant to discuss POA/trust document	Discovery (Non-Deposition)
9/10/2021	Rachel Steyer	0.4	\$750	\$300	communications with NRD and NCN concerning declarant authorization forms and POA docs	Discovery (Non-Deposition)
9/13/2021	Guy Wallace	0.3	\$1,350	\$405	com's with Waters re additional information re the construction history of B.'s facilities	Experts (Including Retention)
9/13/2021	Guy Wallace	0.4	\$1,350	\$540	review and analysis of financial resource materials from Regan and Van Alst; preparation for mediation with MJ Infante	Settlement
9/13/2021	Mark Johnson	0.1	\$1,150	\$115	call w/ TCC re analysis of facilities for prioritization of staffing analysis	Case Organization, Planning and Strategy
9/13/2021	Mark Johnson	0.4	\$1,150	\$460	email exchanges w/ Marks re review of data, meet and confer correspondence	Discovery (Non-Deposition)
9/13/2021	Rachel Steyer	0.4	\$750	\$300	preparing email to MTJ with new batch of authorizations and cover letter to circulate to opposing counsel	Communications With Opposing Counsel
9/13/2021	Rachel Steyer	0.2	\$750	\$150	email to MTJ and GBW with update about authorization project	Discovery (Non-Deposition)
9/13/2021	Rachel Steyer	1.0	\$750	\$750	preparing last batch of authorization forms to be sent to declarants, updating sharepoint	Discovery (Non-Deposition)
9/13/2021	Rachel Steyer	0.2	\$750	\$150	email to declarant concerning finalizing authorization forms	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/13/2021	Rachel Steyer	0.2	\$750	\$150	phone call with declarant to remind her to sign authorization and discussed transmission of POA documentation	Discovery (Non-Deposition)
9/13/2021	Rachel Steyer	0.2	\$750	\$150	received call back from declarant, discussed signing authorization and sending copy of POA	Discovery (Non-Deposition)
9/13/2021	Rachel Steyer	0.5	\$750	\$375	received call back from declarant, discussed authorization process and obtaining copy of POA documentation	Discovery (Non-Deposition)
9/13/2021	Rachel Steyer	0.9	\$750	\$675	communications on teams with NRD and NCN concerning status of signed declarant authorizations, POA documentation	Discovery (Non-Deposition)
9/13/2021	Rachel Steyer	0.6	\$750	\$450	reviewing and double checking status of signed declarant authorizations, those that have been prepared and sent to opposing counsel, updating and double checking numbers in sharepoint	Discovery (Non-Deposition)
9/13/2021	Rachel Steyer	0.3	\$750	\$225	email to NCN and NRD concerning priorities of outreach to declarants with missing signed authorizations	Discovery (Non-Deposition)
9/13/2021	Rachel Steyer	0.7	\$750	\$525	preparing combined signed declarant authorization forms and POA docs	Discovery (Non-Deposition)
9/13/2021	Travis Close	1.5	\$850	\$1,275	Legal research re: whether requests for resident records under HSC 1569.269 are impacted from a pause in new classwide discovery	Case Organization, Planning and Strategy
9/13/2021	Travis Close	0.5	\$850	\$425	Begin creating chart analyzing facilities by number of resident optouts (staffing analysis prioritization)	Case Organization, Planning and Strategy
9/13/2021	Travis Close	0.3	\$850	\$255	Review and analyze dec of Jordan Vick iso Admin motion to file under seal	Class Certification
9/13/2021	Travis Close	0.7	\$850	\$595	Review and analyze prior orders from judge beeler re: permits or limitations on "new discovery"	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/13/2021	Travis Close	1.4	\$850	\$1,190	Legal research re: issue of whether employees have a reasonable expectation of privacy for corrective action forms and action plans issued	Discovery (Non-Deposition)
9/13/2021	Travis Close	1.3	\$850	\$1,105	Review and analyze, & organize records for class member Betty Dillingham from Defendants' productions	Discovery (Non-Deposition)
9/13/2021	Travis Close	1.4	\$850	\$1,190	Review and analyze, & organize records for class member Paulina Garduna from Defendants' productions	Discovery (Non-Deposition)
9/13/2021	Travis Close	1.2	\$850	\$1,020	Review and analyze, & organize records for class member Mike Weaver from Defendants' productions	Discovery (Non-Deposition)
9/14/2021	Guy Wallace	0.2	\$1,350	\$270	com's with TCC re average length of resident stay	Misc. Research
9/14/2021	Guy Wallace	2.7	\$1,350	\$3,645	preparation for mediation with MJ Infante; D's; insurance carriers	Settlement
9/14/2021	Mark Johnson	1.7	\$1,150	\$1,955	work on draft ltr to OC re improper errata	Communications With Opposing Counsel
9/14/2021	Mark Johnson	1.3	\$1,150	\$1,495	work on position statements rebutting anticipated D arguments at mediation session	Settlement
9/14/2021	Mark Johnson	0.4	\$1,150	\$460	calls w/ GBW re settlement issues for mediation statement; review revisions to position chart	Settlement
9/14/2021	Rachel Steyer	0.3	\$750	\$225	call with declarant, discussed authorization process	Discovery (Non-Deposition)
9/14/2021	Rachel Steyer	0.3	\$750	\$225	call with declarant to remind him to sign authorization forms and send POA documents	Discovery (Non-Deposition)
9/14/2021	Rachel Steyer	0.3	\$750	\$225	call with declarant to discuss authorization and sending POA documentation	Discovery (Non-Deposition)
9/14/2021	Rachel Steyer	0.7	\$750	\$525	communications with NRD and NCN on teams concerning finalizing authorization forms and obtaining POAs from declarants	Discovery (Non-Deposition)
9/14/2021	Rachel Steyer	0.2	\$750	\$150	email to RAB with request of doc searches for declarant residency agreements	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/14/2021	Rachel Steyer	0.2	\$750	\$150	response to declarant about status of her obtaining POA	Discovery (Non-Deposition)
9/14/2021	Rachel Steyer	0.2	\$750	\$150	email to NCN and NRD updating them with status of outstanding declarants, signatures, POA documents	Discovery (Non-Deposition)
9/14/2021	Rachel Steyer	0.3	\$750	\$225	email to MTJ updating him about status of outstanding POA documentation	Discovery (Non-Deposition)
9/14/2021	Rachel Steyer	0.3	\$750	\$225	preparing next batch of communication with opposing counsel, MTJ cover letter, and signed declarant authorization forms + POAs	Discovery (Non-Deposition)
9/14/2021	Travis Close	0.7	\$850	\$595	Review and analyze press releases & financial filings re: ownership/lease restructuring agreements with Ventas. Welltower, and HCP	Case Organization, Planning and Strategy
9/14/2021	Travis Close	1.6	\$850	\$1,360	Create chart analyzing number of residents who opted out of arbitration for each facility	Case Organization, Planning and Strategy
9/14/2021	Travis Close	1.1	\$850	\$935	Add to chart analyzing length of time each Brookdale facility was open during class period	Case Organization, Planning and Strategy
9/14/2021	Travis Close	1.4	\$850	\$1,190	Create chart analyzing data found on average LOS from Brookdale-produced documents	Discovery (Non-Deposition)
9/14/2021	Travis Close	1.1	\$850	\$935	Review and analyze results for average LOS -- "avg. LOS", "average length of stay", "avg. length of stay", "average LOS"	Discovery (Non-Deposition)
9/15/2021	Guy Wallace	5.5	\$1,350	\$7,425	mediation with MJ Infante; Lee; Maatman; GG; KAS; DTM; MTJ	Settlement
9/15/2021	Guy Wallace	0.8	\$1,350	\$1,080	com's with co-counsel re results of mediation	Settlement
9/15/2021	Mark Johnson	4.5	\$1,150	\$5,175	mediation at JAMS	Settlement
9/15/2021	Rachel Steyer	0.2	\$750	\$150	call with co-counsel to discuss preparing email list declarants	Class Outreach and Contact
9/15/2021	Rachel Steyer	0.2	\$750	\$150	preparing and sending next batch of signed authorization and POA forms with updated cover letter to MTJ to distribute to opposing counsel	Communications With Opposing Counsel

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/15/2021	Rachel Steyer	0.2	\$750	\$150	preparing next batch of communications for MTJ to send to opposing counsel, updating cover letter	Communications With Opposing Counsel
9/15/2021	Rachel Steyer	0.4	\$750	\$300	response to MTJ and GBW with status of signed authorizations and POA documents	Discovery (Non-Deposition)
9/15/2021	Rachel Steyer	0.7	\$750	\$525	assisting TCC with document review to try to locate LOS information as requested by GBW	Discovery (Non-Deposition)
9/15/2021	Rachel Steyer	0.5	\$750	\$375	communications on teams with NRD and NCN on finalizing declarant authorization forms and obtaining copies of POAs	Discovery (Non-Deposition)
9/15/2021	Travis Close	0.3	\$850	\$255	Call with MTJ re: helpful documents to send for mediation	Case Organization, Planning and Strategy
9/15/2021	Travis Close	0.3	\$850	\$255	Email to RLS re: further info on length of stay research assignment	Case Organization, Planning and Strategy
9/15/2021	Travis Close	0.9	\$850	\$765	Review results of residency agreement database analysis by JND for info re: missing residency agreements for Orange, Casa Whittier, and Riverwalk facilities	Case Organization, Planning and Strategy
9/15/2021	Travis Close	0.9	\$850	\$765	Revise spreadsheet analyzing dates of facility operation & arbitration opt-outs; send to MTJ	Case Organization, Planning and Strategy
9/15/2021	Travis Close	1.1	\$850	\$935	Review and analyze product of assest management spreadsheets for info on LOS metrics for owners/landlords	Discovery (Non-Deposition)
9/15/2021	Travis Close	0.7	\$850	\$595	Review and analyze DSS production for exemplar Management Agreements and Master Lease agreements to use at mediation	Discovery (Non-Deposition)
9/16/2021	Guy Wallace	0.3	\$1,350	\$405	review and analysis of draft letter from MTJ to GLM re D's changes to witnesses deposition testimony	Discovery (Non-Deposition)
9/16/2021	Guy Wallace	1.9	\$1,350	\$2,565	analysis of D's arguments re own or operate status re facilities; Burger King decision; case law re class certification; com's with MTJ re same	Settlement

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/16/2021	Guy Wallace	0.2	\$1,350	\$270	com's with MJ Infante re 9/15 mediation	Settlement
9/16/2021	Guy Wallace	0.5	\$1,350	\$675	com's with GG; KAS; DTM; MTJ re 9/15 mediation	Settlement
9/16/2021	Travis Close	0.3	\$850	\$255	Review and analyze notes from yesterday's mediation session	Case Organization, Planning and Strategy
9/16/2021	Travis Close	0.8	\$850	\$680	Legal research re: other cases brought against Brookdale for disability access violations	Case Organization, Planning and Strategy
9/16/2021	Travis Close	0.7	\$850	\$595	Legal research re: other cases brought against Brookdale for understaffing violations	Case Organization, Planning and Strategy
9/16/2021	Travis Close	0.5	\$850	\$425	Review and analyze draft letter brief by MTJ re: errata sheet deposition changes for Garner and Bowman depositions + exhibit of changes	Depositions
9/16/2021	Travis Close	0.8	\$850	\$680	Analyze prior discovery requests for requests for third party management agreements & docs sufficient to establish ownership interests	Discovery (Non-Deposition)
9/16/2021	Travis Close	1.5	\$850	\$1,275	Analyze prior correspondence for mentions of requests for third party management agreements, leases, and ownership interest docs	Discovery (Non-Deposition)
9/16/2021	Travis Close	0.7	\$850	\$595	Review and analyze efforts by team to organize management agreeemnts from CDSS third party production	Discovery (Non-Deposition)
9/16/2021	Travis Close	0.6	\$850	\$510	Analyze prior court filings & joint discovery letters for mentions of requests for third party management agreements, leases, and ownership interest docs	Discovery (Non-Deposition)
9/16/2021	Travis Close	1.6	\$850	\$1,360	Draft analysis of discovery requests, M&C efforts, and team efforts to gather docs re: management & lease agreements of brookdale facilities	Discovery (Non-Deposition)
9/16/2021	Travis Close	0.4	\$850	\$340	Review and analyze docs identified as hot for this week authored by Steven Glynt by JMP	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/17/2021	Guy Wallace	0.7	\$1,350	\$945	legal research and analysis re Castaneda v. Burger King; analysis of same from MJ Laporte in Gray v. GGNRA; com's with GG; MTJ re same	Class Certification
9/17/2021	Guy Wallace	0.4	\$1,350	\$540	com's with JRA re 9/15 mediation and results thereof	Settlement
9/17/2021	Rachel Steyer	0.4	\$750	\$300	preparing next batch of authorizations for MTJ to send to opposing counsel	Communications With Opposing Counsel
9/17/2021	Rachel Steyer	0.3	\$750	\$225	received call from declarant confirming email from RBGG re submitting photo	Discovery (Non-Deposition)
9/17/2021	Rachel Steyer	0.4	\$750	\$300	communications with NRD and NCN re status of gathering declarants POAs and authorizations	Discovery (Non-Deposition)
9/17/2021	Travis Close	1.4	\$850	\$1,190	Review and analyze press releases and media coverage for evidence of master lease transactions with Ventas and Health Care REIT/Healthpeak	Case Organization, Planning and Strategy
9/17/2021	Travis Close	0.8	\$850	\$680	Legal research re: whether errata changes can properly change an answer from "yes" to "no" due to allege misspeaking	Case Organization, Planning and Strategy
9/17/2021	Travis Close	0.9	\$850	\$765	Legal reasearch re: how to time the 30-day rule for submitting depo errata	Depositions
9/17/2021	Travis Close	0.6	\$850	\$510	Review and analyze Brookdale's 2020 10-k + Exh. 21 for refences to operating and management agreements	Discovery (Non-Deposition)
9/17/2021	Travis Close	0.4	\$850	\$340	Review and analyze recent visits to Riverwalk, North Tarzana, and Napa facilities by Cal DSS	Discovery (Non-Deposition)
9/18/2021	Guy Wallace	1.3	\$1,350	\$1,755	review and analysis of issues re Defendants' contention that Brookdale does not own, operate or manage its CA facilities; com's with MTJ re same	Misc. Research
9/18/2021	Mark Johnson	0.2	\$1,150	\$230	call from GBW re analysis of Ds positon on ownership and operation	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/18/2021	Mark Johnson	0.4	\$1,150	\$460	further discussion w/ GBW re D's position on ownership/operation and investigation and analysis needed for rebutting same.	Case Organization, Planning and Strategy
9/19/2021	Rachel Steyer	0.3	\$750	\$225	updating cover letter and email for MTJ to circulate to opposing counsel	Communications With Opposing Counsel
9/20/2021	Guy Wallace	0.7	\$1,350	\$945	legal research and analysis re Wren; Frank v. Gold-n-Plump and progeny re "no-policy policy" and class certification	Class Certification
9/20/2021	Guy Wallace	0.3	\$1,350	\$405	com's with GLM; MTJ re D's request for .mod data	Discovery (Non-Deposition)
9/20/2021	Guy Wallace	1.2	\$1,350	\$1,620	com's with DTM; MTJ re issue of whether Brookdale owns, operates, manages or licenses its facilities and impact on class certification and liability for injunctive relief	Misc. Research
9/20/2021	Guy Wallace	0.5	\$1,350	\$675	legal research and analysis re language of Title III of the ADA re who is liable for discrimination; common administrative control; remedies available re injunctive relief fixes and who can be ordered to make them	Misc. Research
9/20/2021	Mark Johnson	0.6	\$1,150	\$690	review 7 authorization forms, POAs and ltr and email from RLS re resident file requests.	Discovery (Non-Deposition)
9/20/2021	Mark Johnson	0.1	\$1,150	\$115	draft email to OC as cover for resident record requests.	Discovery (Non-Deposition)
9/20/2021	Mark Johnson	0.1	\$1,150	\$115	review email from OC re expert disclosures and com w/ CoC re same	Experts (Including Retention)
9/20/2021	Travis Close	1.3	\$850	\$1,105	Research assisted living and memory care units for former Brookdale facilities using DSS search -- [Antelope Valley - Fresno]	Case Organization, Planning and Strategy
9/20/2021	Travis Close	1.2	\$850	\$1,020	Research assisted living and memory care units for former Brookdale facilities using DSS search -- [Fresno- Paso Robles]	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/20/2021	Travis Close	1.1	\$850	\$935	Research assisted living and memory care units for former Brookdale facilities using DSS search -- [Paso Robles - Vacaville	Case Organization, Planning and Strategy
9/20/2021	Travis Close	0.8	\$850	\$680	Legal research re: whether defendants are obligated to disclose all subsidiaries in SEC filings	Case Organization, Planning and Strategy
9/20/2021	Travis Close	0.7	\$850	\$595	Review and analyze DSS production for charts showing corporate control of subsidiaries	Case Organization, Planning and Strategy
9/21/2021	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ re D's depo notices and further interrogatories	Discovery (Non-Deposition)
9/21/2021	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ re stipulation re production of expert data to Defendants	Experts (Including Retention)
9/21/2021	Guy Wallace	1.4	\$1,350	\$1,890	legal research and analysis re whether operators of facilities can be enjoined to remove barriers	Misc. Research
9/21/2021	Mark Johnson	1.4	\$1,150	\$1,610	calls (x5) w/ GBW re Schroyer disclosures, Ds new discovery, ownership issues, agenda for team mtg, settlement posture of defendant, depo schedule, construction history	Case Organization, Planning and Strategy
9/21/2021	Mark Johnson	0.5	\$1,150	\$575	review correspondence in related case re production of .mod files related to Schroyer expert work	Discovery (Non-Deposition)
9/21/2021	Mark Johnson	0.6	\$1,150	\$690	review spreadsheets from expert through Marks re results of audit for missing data.	Discovery (Non-Deposition)
9/21/2021	Mark Johnson	1.7	\$1,150	\$1,955	further research re Brookdale subsidiaries, licensees from corporate record sites.	Discovery (Non-Deposition)
9/21/2021	Mark Johnson	1.5	\$1,150	\$1,725	review other errata for potential objections; finalize letter re improper errata, com w/ co-counsel re same and send to OC	Discovery (Non-Deposition)
9/21/2021	Mark Johnson	0.1	\$1,150	\$115	com w/ OC re meet and confer date on missing assessment data and expert disclosure	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/21/2021	Mark Johnson	0.6	\$1,150	\$690	review D communication re proposed depo schedulues and rogs; review prior rogs from Ds for total numbers, draft emails to GBW describing same	Discovery (Non-Deposition)
9/21/2021	Mark Johnson	0.3	\$1,150	\$345	email exhchanges w/ JM, LEC re transmission of expert facility reports; review filings to identify same and com w/ LEC re same	Experts (Including Retention)
9/21/2021	Mark Johnson	0.7	\$1,150	\$805	call w/ GBW, Jim Thornton, David Marks re D request for additonal expert disclosure of .mod files and program files	Experts (Including Retention)
9/21/2021	Mark Johnson	0.4	\$1,150	\$460	call w/ BU and GBW re production of mod files as part of Schroyer expert disclosure	Experts (Including Retention)
9/21/2021	Travis Close	1.6	\$850	\$1,360	Review divestment dates of former facilities provided by Defendants and confirm with DSS info (website database and subpoena productions	Case Organization, Planning and Strategy
9/21/2021	Travis Close	0.2	\$850	\$170	Email to MTJ re: comments on proposed depo errata challenge letter	Case Organization, Planning and Strategy
9/21/2021	Travis Close	0.6	\$850	\$510	Analyze depo transcript of Kelly Rubin (12-13-18) for info re: structure of Service Alignment system; references to centralization	Case Organization, Planning and Strategy
9/21/2021	Travis Close	1.4	\$850	\$1,190	Analyze completness of record of documents prepared by staff attorneys for class member declarant-witnesses to-date in advance of likely depositions	Class Outreach and Contact
9/21/2021	Travis Close	0.8	\$850	\$680	Review and make suggestions for revised draft letter to Defendatns re: improper depo errata	Depositions
9/21/2021	Travis Close	1.5	\$850	\$1,275	Review and analyze depo errata from earlier deponents, to find erroneous or improper proposed changes	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/21/2021	Travis Close	0.7	\$850	\$595	Review and analyze depo transcript of Christopher Cook (12-13-18) for info re: structure of Service Alignment system; references to centralization	Depositions
9/21/2021	Travis Close	0.8	\$850	\$680	Analyze depo transcript of Steven Flynt (12-13-18) for info re: structure of Service Alignment system; references to centralization	Depositions
9/21/2021	Travis Close	0.7	\$850	\$595	Review and analyze recent DSS facility evaluation reports and complaint investigation reports issued for facilities: Folsom, Roseville, Alhambra, and Chatsworth	Discovery (Non-Deposition)
9/22/2021	Guy Wallace	2.9	\$1,350	\$3,915	legal research and analysis re issue of Brookdale Senior Living, Inc. and Ds' contentions that it does not own, operate or manage its assisted living facilities in CA; com's with JRA and MTJ re same (.8)	Class Certification
9/22/2021	Guy Wallace	0.3	\$1,350	\$405	com's with DTM; MTJ re discovery and D's request for depositions and further expert materials	Discovery (Non-Deposition)
9/22/2021	Guy Wallace	0.3	\$1,350	\$405	com's with Waters re potential review and analysis of D's construction plans re newly constructed and altered facilities	Experts (Including Retention)
9/22/2021	Guy Wallace	0.5	\$1,350	\$675	further analysis of results of 9/15 mediation and notes re settlement discussions going forward	Settlement
9/22/2021	Guy Wallace	0.7	\$1,350	\$945	review and analysis of DOJ settlement re FHA and ADA claim re predominantly senior housing case and IR re same	Settlement
9/22/2021	Mark Johnson	1.0	\$1,150	\$1,150	calls w/ GBW re analysis of Brookdale agreements, ownership issues, engagement of experts, production of .mod files, missing data.	Case Organization, Planning and Strategy
9/22/2021	Mark Johnson	2.8	\$1,150	\$3,220	review Brookdale and subsidiary agreements from 10K exhibits and analyze same, begin drafting memo.	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/22/2021	Mark Johnson	0.3	\$1,150	\$345	review EO spreadsheet of docs found pertaining to residents identified in witness declarations; draft email re follow up	Discovery (Non-Deposition)
9/22/2021	Mark Johnson	0.6	\$1,150	\$690	call w/J Thornton re missing data	Discovery (Non-Deposition)
9/22/2021	Mark Johnson	0.3	\$1,150	\$345	draft email to GW, JM re construction history, depo dates, rog responses re construction history	Experts (Including Retention)
9/22/2021	Mark Johnson	0.2	\$1,150	\$230	review DOJ Dominion consent decree and article re same; email to COC re same.	Misc. Research
9/22/2021	Mark Johnson	0.5	\$1,150	\$575	call and emails with LEC re research project on Brookdale and Subsidiary agreements.	Misc. Research
9/22/2021	Travis Close	1.2	\$850	\$1,020	Review and analyze settlement reached by DOJ with Dominion Management LLC and associated facilities (press release, consent order, complaint)	Case Organization, Planning and Strategy
9/22/2021	Travis Close	0.6	\$850	\$510	Create chart analyzing types of senior housing facilities in settlement reached by DOJ with Dominion Management LLC and associated facilities	Case Organization, Planning and Strategy
9/22/2021	Travis Close	0.4	\$850	\$340	Review and analyze Def's second set of ROGs and second notice of inspection	Case Organization, Planning and Strategy
9/22/2021	Travis Close	0.2	\$850	\$170	Email to GBW re: dates for deposition for June Kailes and Doug Cross	Case Organization, Planning and Strategy
9/22/2021	Travis Close	1.5	\$850	\$1,275	Review, analyze, and organize Issue Registers for Brookdale facilities produced by defendants	Case Organization, Planning and Strategy
9/22/2021	Travis Close	0.5	\$850	\$425	Analyze incentives & performance measures found in 2020 & 2021 CMIPs	Case Organization, Planning and Strategy
9/22/2021	Travis Close	0.9	\$850	\$765	Analyze recent docs produced on Emergency Evacuation communication (for Kailes depo prep)	Depositions
9/22/2021	Travis Close	0.7	\$850	\$595	Analyze incentives & performance measures found in 2019 CMIP, 2019 CMIP (division president), and 2019 CMIP (divisional support)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/23/2021	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ; TCC; RLS re whether Brookdale is an operator or manager of the CA assisted living facilities; analysis of same	Class Certification
9/23/2021	Mark Johnson	0.5	\$1,150	\$575	review 10 additional authroizations, request for resident files and POA docs	Discovery (Non-Deposition)
9/23/2021	Mark Johnson	0.2	\$1,150	\$230	email exchanges w/ RSL re additional requests for resident records and authorizations / releases	Discovery (Non-Deposition)
9/23/2021	Mark Johnson	0.1	\$1,150	\$115	email to OC re additonal 10 requests for resident records	Discovery (Non-Deposition)
9/23/2021	Mark Johnson	0.7	\$1,150	\$805	review and compare Thornton/Blake chart of missing data with D's chart of faciilties with dispoitions to determine completeness of data	Discovery (Non-Deposition)
9/23/2021	Mark Johnson	0.1	\$1,150	\$115	email to Thornton re results of comparison of missing data chart with D's dispositon dates.	Discovery (Non-Deposition)
9/23/2021	Mark Johnson	0.9	\$1,150	\$1,035	draft email instructions to JP for research project re subsidiaries; review chart and underlying docs for same	Discovery (Non-Deposition)
9/23/2021	Rachel Steyer	4.7	\$750	\$3,525	reviewing and gathering facts and citations in response to analysis re Brookdale Senior Living operation of facilities	Class Certification
9/23/2021	Rachel Steyer	0.2	\$750	\$150	preparing next batch of communications for MTJ to be distributed to opposing counsel	Communications With Opposing Counsel
9/23/2021	Rachel Steyer	0.3	\$750	\$225	double checking number of communication batches with opposing counsel, updating MTJ	Discovery (Non-Deposition)
9/23/2021	Rachel Steyer	0.4	\$750	\$300	response to GBW and MTJ with additioanl update about status of declarant authorizations	Discovery (Non-Deposition)
9/23/2021	Rachel Steyer	0.2	\$750	\$150	communications on teams with NRD and NCN regarding declarant authorization proeject	Discovery (Non-Deposition)
9/23/2021	Travis Close	0.7	\$850	\$595	Review and analyze Brookdale's 10-k for references to operational control over facilities	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/23/2021	Travis Close	1.4	\$850	\$1,190	Continue analyzing SEC filings from Brookdale showing information on subsidiaries including management and lease agreements	Case Organization, Planning and Strategy
9/23/2021	Travis Close	0.3	\$850	\$255	Email to RLS re: new assignment in researching factual support for BSL's operation of facilities	Case Organization, Planning and Strategy
9/23/2021	Travis Close	0.2	\$850	\$170	Email to GBW, MTJ re: factual support needed for showing BSL's operation of facilities and control subsidiaries	Case Organization, Planning and Strategy
9/23/2021	Travis Close	1.2	\$850	\$1,020	Create chart for Supporting Facts to include as citations for key Facts showing that Brookdale is the operator of the facilities	Class Certification
9/23/2021	Travis Close	1.1	\$850	\$935	Analyze deposition of Kevin Bowman (June 9) for info re: budget and capital expenditures indicating BSL's operational control	Depositions
9/23/2021	Travis Close	1.2	\$850	\$1,020	Analyze deposition of Kevin Bowman from July 13, 2021 (topic 5) for articulations of adherence to service alignment benchmarks and the budget	Depositions
9/23/2021	Travis Close	1.1	\$850	\$935	Analyze deposition of Kevin Bowman from July 14, 2021 (topic 5 - continued) for articulations of adherence to service alignment benchmarks and the budge	Depositions
9/23/2021	Travis Close	0.6	\$850	\$510	Analyze June 30, 2021 deposition of Sheila garner for info re: process for budget approval by BSL corporate	Depositions
9/23/2021	Travis Close	0.5	\$850	\$425	Analyze template residency agreements for info re: operational control of facilities	Discovery (Non-Deposition)
9/24/2021	Guy Wallace	1.1	\$1,350	\$1,485	prepare for and participate in team call re discovery tasks with GG; JY; AX; EH; MTJ; TCC; RLS; BU	Discovery (Non-Deposition)
9/24/2021	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re production of .mod files re Schroyer analysis	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/24/2021	Mark Johnson	1.2	\$1,150	\$1,380	team strategy meeting via Zoom re depo scheduling, prep and defense, rog responses, fact research re ownership and operation, expert witness search re same; additional discovery and follow up on prior discovery requests	Case Organization, Planning and Strategy
9/24/2021	Mark Johnson	0.8	\$1,150	\$920	draft agenda/task list for planning meeting and work going forward.	Case Organization, Planning and Strategy
9/24/2021	Mark Johnson	0.2	\$1,150	\$230	email exchange w/ RLS re status of authorizations for release of resident files and hesitant declarants.	Discovery (Non-Deposition)
9/24/2021	Mark Johnson	1.7	\$1,150	\$1,955	revise draft email to OC re missing data and subsequent data audit; email to COC re same and need for decision on production of mod files.	Discovery (Non-Deposition)
9/24/2021	Mark Johnson	0.7	\$1,150	\$805	review work product from JP re research on subsidiaries; review examples of corporate docs	Discovery (Non-Deposition)
9/24/2021	Mark Johnson	1.1	\$1,150	\$1,265	calls x4 w GBW re production of .mod files and program files related to Schroyer declaration and coms w/ COC Marks re same	Discovery (Non-Deposition)
9/24/2021	Mark Johnson	0.2	\$1,150	\$230	further coms w/ DM re production of mod files	Discovery (Non-Deposition)
9/24/2021	Mark Johnson	0.4	\$1,150	\$460	further revisions to email to OC re missing data and .mod files.	Discovery (Non-Deposition)
9/24/2021	Mark Johnson	0.5	\$1,150	\$575	coms w/ GBW, RLS re info on total number of residents in currently operated BKD facilities; locate and transmit existing info re same	Misc. Research
9/24/2021	Rachel Steyer	1.2	\$750	\$900	meeting with GBW, MTJ, TCC, and co-counsel to discuss action items to prep for depositions, outstanding dsicoverly	Case Organization, Planning and Strategy
9/24/2021	Rachel Steyer	0.3	\$750	\$225	call with TRB about upcoming/outstanding outreach project	Class Outreach and Contact
9/24/2021	Rachel Steyer	0.2	\$750	\$150	email to NCN, NRD, TRB re reviewing old intakes and declarations	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/24/2021	Rachel Steyer	0.2	\$750	\$150	preparing next batch of signed authorizations to be sent to opposing counsel from MTJ, updating sharepoint	Communications With Opposing Counsel
9/24/2021	Rachel Steyer	0.2	\$750	\$150	response to declarant regarding who is appropriate individual to sign authorization forms	Discovery (Non-Deposition)
9/24/2021	Rachel Steyer	0.2	\$750	\$150	response to declarant concerning hesitation to sign authrozation/produce POA forms	Discovery (Non-Deposition)
9/24/2021	Rachel Steyer	3.7	\$750	\$2,775	reviewing deposition transcripts and adding relevant facts and citations to support chart re Brookdale's ownership/management of facilities	Misc. Research
9/24/2021	Rachel Steyer	0.7	\$750	\$525	preparing/updating chart for GBW for 48 facilities and total number of units	Misc. Research
9/24/2021	Travis Close	0.7	\$850	\$595	Analyze ED training documents for info re: discretion or centralized control with regard to budgets	Case Organization, Planning and Strategy
9/24/2021	Travis Close	0.5	\$850	\$425	Review and analyze job descriptions for corporate persone lfor info re: hiring/firing/discipline responsibility	Case Organization, Planning and Strategy
9/24/2021	Travis Close	1.3	\$850	\$1,105	Analyze emails by custodian Jeffrey Toomer that discuss terminations of EDs or associates	Case Organization, Planning and Strategy
9/24/2021	Travis Close	1.4	\$850	\$1,190	Review and analysis - results for "human resources business partner" and "termination" -- to determine process for terminating employees and responsibility by corporate or facility personnel	Case Organization, Planning and Strategy
9/24/2021	Travis Close	1.2	\$850	\$1,020	Team meeting with co-counsel re: litigation strategy including answering Def's latest discovery requests, scheduling depositions of experts and class reps, follow-up discovery	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/24/2021	Travis Close	0.8	\$850	\$680	Analyze Brookdale's policies and procedures with regard to renovation to determine influence of corporate departments on facilities to mandate changes	Class Certification
9/24/2021	Travis Close	0.6	\$850	\$510	Review and analyze depo of Jeffrey Toomer for info re: hiring and firing authority at corporate level v. facility level	Depositions
9/24/2021	Travis Close	0.4	\$850	\$340	Analyze depo transcript of Jeffrey Toomer for info re: renovation and responsibility under corporate or at the facility level for renovating facilities	Depositions
9/24/2021	Travis Close	0.5	\$850	\$425	Review and analyze list of insurance agreements produced, for which years and for which companies, to determine supplementation required	Discovery (Non-Deposition)
9/24/2021	Travis Close	1.1	\$850	\$935	Research policies, procedures, and training docs for Human Resources Business Partner with an emphasis on hiring/firing policies	Discovery (Non-Deposition)
9/27/2021	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ re production of .mod files to Defendants	Discovery (Non-Deposition)
9/27/2021	Mark Johnson	0.5	\$1,150	\$575	coms w/ GBW re production of mod and pkg files, position of COC	Discovery (Non-Deposition)
9/27/2021	Mark Johnson	0.3	\$1,150	\$345	email exchanges w GLM re meet and confer on missing data, agreements	Discovery (Non-Deposition)
9/27/2021	Mark Johnson	0.7	\$1,150	\$805	research re Rule 26 obligations and work product for expert disclosures.	Discovery (Non-Deposition)
9/27/2021	Mark Johnson	0.2	\$1,150	\$230	email exchange w/ RLS re next batch of resident file requests	Discovery (Non-Deposition)
9/27/2021	Mark Johnson	2.8	\$1,150	\$3,220	continue reviewiing master lease agreements and other agreements involving Brookdale subsidiaries and chart of facts from same	Discovery (Non-Deposition)
9/27/2021	Mark Johnson	0.7	\$1,150	\$805	begin work on MTC letter re agreements.	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/27/2021	Rachel Steyer	0.4	\$750	\$300	communications on teams with NRD and NCN concerning declarant authorizations	Discovery (Non-Deposition)
9/27/2021	Rachel Steyer	5.8	\$750	\$4,350	reviewing deposition transcripts, corporate documents, brookdale produced documents to continue gathering relevant facts and citations for GBW chart for ownership/control of facilities	Misc. Research
9/27/2021	Travis Close	0.2	\$850	\$170	Email to RLS & team re: changed names to Nohl Ranch and Gardens of Tarzana facilities	Case Organization, Planning and Strategy
9/27/2021	Travis Close	0.2	\$850	\$170	Email to RLS re: resources for determining facility unit capacities	Case Organization, Planning and Strategy
9/27/2021	Travis Close	0.5	\$850	\$425	Review and analyze nalyze spreadsheet constituting full audit of data production in prep for tomorrow's call with defendants discussing same	Case Organization, Planning and Strategy
9/27/2021	Travis Close	1.1	\$850	\$935	Legal research re: regulations prohibiting operators from contracting out compliance with ADA	Case Organization, Planning and Strategy
9/27/2021	Travis Close	1.3	\$850	\$1,105	Analyze production of DSS records from former facilities to determine unit capacities in AL/MC	Discovery (Non-Deposition)
9/28/2021	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re depo schedule and analysis of same re P's experts	Depositions
9/28/2021	Guy Wallace	1.4	\$1,350	\$1,890	com's with DTM; JT; MTJ re production of .pkg files and .mod files	Discovery (Non-Deposition)
9/28/2021	Guy Wallace	0.5	\$1,350	\$675	analysis of D's request for construction history and need for further discovery re same to D's, reciprocal obligations of parties	Discovery (Non-Deposition)
9/28/2021	Guy Wallace	0.5	\$1,350	\$675	analysis of results of 9/15/21 mediation and need for preparation of letter re same; com's with MTJ re same	Settlement
9/28/2021	Mark Johnson	0.9	\$1,150	\$1,035	meet and confer w/ Jacobsen, Riley and TCC re assessmenet and PSP data, agreements, floor plans and medmodel disclosures	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/28/2021	Mark Johnson	1.0	\$1,150	\$1,150	call w/ GBW, Marks and Thornton re production of .mod and pkg files.	Discovery (Non-Deposition)
9/28/2021	Mark Johnson	0.5	\$1,150	\$575	call w/ GBW re further discovery re alterations on BKD facilities and strategy on response to D's demand for .mod files.	Discovery (Non-Deposition)
9/28/2021	Mark Johnson	0.4	\$1,150	\$460	review additional request and docs iso requests for resident files related to declarants; coms w/ LEC and RLS re same	Discovery (Non-Deposition)
9/28/2021	Mark Johnson	0.1	\$1,150	\$115	email to OC re request for resident files, batch 9	Discovery (Non-Deposition)
9/28/2021	Mark Johnson	0.5	\$1,150	\$575	prep for meet and confer w/ OC re agreements and assessment/psp data, including preparation of outline of issues to address and arguments	Discovery (Non-Deposition)
9/28/2021	Mark Johnson	0.3	\$1,150	\$345	emails w/ JY, KS re Algarme supplemental responses, requests for supplementation of plaintiffs' files	Discovery (Non-Deposition)
9/28/2021	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW re results of meet and confer w/ OC, strategy for letter brief and response to D's demand for further expert disclosures.	Discovery (Non-Deposition)
9/28/2021	Mark Johnson	0.2	\$1,150	\$230	email to COC re expert witness depos and schedule	Discovery (Non-Deposition)
9/28/2021	Mark Johnson	0.3	\$1,150	\$345	coms w/ tcc, GW, Mastin re compliation of construction history and docs	Experts (Including Retention)
9/28/2021	Mark Johnson	0.4	\$1,150	\$460	review email and news link from GCG re elder abuse at Folsom facility and Brookdale response; draft email response re implications for ownership / operation issue	Misc. Research
9/28/2021	Mark Johnson	1.5	\$1,150	\$1,725	work on letter brief iso mtn to compel agreements	Other Motions
9/28/2021	Rachel Steyer	0.2	\$750	\$150	preparing and updating cover letter for MTJ, combining additional declarant authorization forms to send to opposing counsel	Communications With Opposing Counsel
9/28/2021	Rachel Steyer	0.4	\$750	\$300	communications with NRD and NCN on teams discussing status of declarant authorizations	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/28/2021	Travis Close	0.9	\$850	\$765	M/C followup: research history of Brookdale Merced as AL facility in California (included by mistake in assessment data according to Defs)	Case Organization, Planning and Strategy
9/28/2021	Travis Close	0.4	\$850	\$340	Email to MTJ, EPO, and RAB re: new assignment regarding construction histories for each facility	Case Organization, Planning and Strategy
9/28/2021	Travis Close	0.9	\$850	\$765	Meet and confer with MTJ and defendants (Michael Jacobson) re: failure to produce assessment data; contracts showing ownership interest; and scheduling depositions	Communications With Opposing Counsel
9/28/2021	Travis Close	1.5	\$850	\$1,275	Review and analyze construction history spreadsheet, construction date chart, and narrative summaries to plan template for response to Def's interrogatories	Discovery (Non-Deposition)
9/28/2021	Travis Close	1.2	\$850	\$1,020	Responses to Def's interrogatories -- review history of correspondence between SWCK attorneys and architect experts to verify how construction history info was communicated	Discovery (Non-Deposition)
9/28/2021	Travis Close	0.3	\$850	\$255	Email to MTJ re: construction history analysis provided to experts	Experts (Including Retention)
9/28/2021	Travis Close	0.4	\$850	\$340	Review and analyze expert disclosures to verify that construction history info was included	Experts (Including Retention)
9/29/2021	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re the named P's resident files and update re same; preparation for depositions	Discovery (Non-Deposition)
9/29/2021	Guy Wallace	0.3	\$1,350	\$405	review and analysis of D's Initial Disclosures; need to supplement P's Initial Disclosures; com's with RLS re same	Discovery (Non-Deposition)
9/29/2021	Guy Wallace	0.5	\$1,350	\$675	legal research and analysis re federal and state standards re determining which access standards apply to a particular project and building permit applications; com's with MTJ re same	Misc. Research

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/29/2021	Mark Johnson	2.0	\$1,150	\$2,300	review documents and work on draft memo identifying facts refuting non-ownership/operation by Brookdale and evidence supporting same	Case Organization, Planning and Strategy
9/29/2021	Mark Johnson	0.5	\$1,150	\$575	review 4 sets of RFPs for requests seeking plaintiffs' records.	Discovery (Non-Deposition)
9/29/2021	Mark Johnson	0.2	\$1,150	\$230	draft email to GBW re request for additional records re Plaintiffs and options.	Discovery (Non-Deposition)
9/29/2021	Mark Johnson	0.3	\$1,150	\$345	review and draft response to K Stilber email re documents requested and produced by Defendants comprising Plaintiffs files.	Discovery (Non-Deposition)
9/29/2021	Mark Johnson	0.9	\$1,150	\$1,035	Teams mtg w/ Bonner, Close, Olivares re construction history research follow up and compilation of data and supporting documents	Discovery (Non-Deposition)
9/29/2021	Mark Johnson	0.4	\$1,150	\$460	review D's initial disclosures and discuss w/ GBW re ability to use same for leveraging supplemental production of Plaintiff files, other options for obtaining same	Discovery (Non-Deposition)
9/29/2021	Mark Johnson	0.3	\$1,150	\$345	draft email to M Jacobsen following up on meet and confer re production of assessment data.	Discovery (Non-Deposition)
9/29/2021	Mark Johnson	0.3	\$1,150	\$345	draft email to Marks responding to proposed argument re confidentiality of .mod files as intellectual property; plan to produce SAS program files	Discovery (Non-Deposition)
9/29/2021	Mark Johnson	0.7	\$1,150	\$805	review case law and statutes on trigger dates for establishing new construction under ADA and applicable CBC Title 24 version for Unruh Act claims.	Experts (Including Retention)
9/29/2021	Rachel Steyer	0.3	\$750	\$225	communications on teams with TRB, NRD, NCN re declarant authorization signatures and outreach efforts	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/29/2021	Travis Close	1.0	\$850	\$850	Review and analyze Lane v. Landmark decision: providing examples for how architectural barriers are evaluated; requirements for prevailing in MSJ; and stating that subsequent owners are liable for accessibility barriers on premises	Case Organization, Planning and Strategy
9/29/2021	Travis Close	0.3	\$850	\$255	Review and analyze federal standards for new construction and alterations (28 CFR 36.406)	Case Organization, Planning and Strategy
9/29/2021	Travis Close	1.0	\$850	\$850	Meeting with EPO, MTJ, RAB re: completing construction histories of facilities in response to Def's ROGs	Case Organization, Planning and Strategy
9/29/2021	Travis Close	0.5	\$850	\$425	Analyze recent DSS complaint investigation and facility evaluation reports against Brookdale Folsom facility (media story alleging elder abuse)	Case Organization, Planning and Strategy
9/29/2021	Travis Close	0.3	\$850	\$255	Review and analyze ADAAG section 4.5 for maximum slope prescribed near counter surfaces	Discovery (Non-Deposition)
9/30/2021	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ re depo schedule and preparation issues	Depositions
9/30/2021	Guy Wallace	0.5	\$1,350	\$675	com's with RLS re P's Initial Disclosures and Rule 26 supplementation re same	Discovery (Non-Deposition)
9/30/2021	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re production of .pkg files to Defendants and D's production of declarant files to Plaintiffs and meet and confer re same	Discovery (Non-Deposition)
9/30/2021	Mark Johnson	0.6	\$1,150	\$690	develop proposed schedule for expert depositions; com w/ GBW re same and re communications with Kailes and Cross	Depositions
9/30/2021	Mark Johnson	0.7	\$1,150	\$805	review and draft response to David Marks email re re production of .mod and .pkg files and strategy for communication with Ds re same; confidentiality issues.	Discovery (Non-Deposition)
9/30/2021	Mark Johnson	0.4	\$1,150	\$460	calls x 2 w/ expert Douglas Cross re depo availability and scheduling	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/30/2021	Mark Johnson	0.2	\$1,150	\$230	com w/ June Kailes re expert depo	Experts (Including Retention)
9/30/2021	Mark Johnson	0.6	\$1,150	\$690	review and provide comments to GBW on revised and highlighted Schroyer declaration in opposition to motion to strike reply declaration	Other Motions
9/30/2021	Mark Johnson	2.4	\$1,150	\$2,760	work on ltr brief iso mtn to compel agreements; review docs and depo testimony for same	Other Motions
9/30/2021	Rachel Steyer	0.4	\$750	\$300	reviewing and looking for potential declarant residency agreements	Discovery (Non-Deposition)
9/30/2021	Rachel Steyer	0.7	\$750	\$525	call with GBW to discuss supplemental discovery and outreach projects	Discovery (Non-Deposition)
9/30/2021	Rachel Steyer	0.3	\$750	\$225	communications on teams with NRD and NCN regarding declarant authorizations, updated intakes/declarations	Discovery (Non-Deposition)
10/1/2021	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ re meet and confer with D's re class discovery; D's proposal for extension of schedule re class cert	Discovery (Non-Deposition)
10/1/2021	Guy Wallace	0.6	\$1,350	\$810	legal research and analysis re D's argument that Unruh Act minimum statutory damages are unconstitutional	Misc. Research
10/1/2021	Mark Johnson	0.1	\$1,150	\$115	email exchange w/ COC Marks re settng depositions for Schroyer, Flores	Depositions
10/1/2021	Mark Johnson	0.9	\$1,150	\$1,035	draft outline for mulit-issue meet and confer call w/OC	Discovery (Non-Deposition)
10/1/2021	Mark Johnson	0.8	\$1,150	\$920	meet and confer w/ OC re expert materials, depo schedule, missing assessment data, resident files.	Discovery (Non-Deposition)
10/1/2021	Mark Johnson	0.2	\$1,150	\$230	email to COC re meet and confer plans/outline, issues re resident files	Discovery (Non-Deposition)
10/1/2021	Mark Johnson	0.5	\$1,150	\$575	draft email to Marks, Thornton re results of meet and confer as it affects data production, assessments and staffing analysis, floor plans	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/1/2021	Mark Johnson	0.4	\$1,150	\$460	draft emails to OC following up on depo scheduling, agreement on production of assessment and PSS data,	Discovery (Non-Deposition)
10/1/2021	Mark Johnson	0.3	\$1,150	\$345	revise draft ltr to OC re production of expert program files.	Discovery (Non-Deposition)
10/1/2021	Mark Johnson	0.2	\$1,150	\$230	email exchange w/ Blake Peters re transferring program files to hard disk and sending to opposing counsel	Discovery (Non-Deposition)
10/1/2021	Mark Johnson	2.4	\$1,150	\$2,760	continue drafting and finalizing P section of letter brief re agreements	Other Motions
10/1/2021	Rachel Steyer	0.2	\$750	\$150	editing and revising NRD draft declaration	Class Certification
10/1/2021	Rachel Steyer	0.3	\$750	\$225	editing and reviewing NCN draft declaration	Class Certification
10/1/2021	Rachel Steyer	0.2	\$750	\$150	email to GBW memorializing phone call outlining outstanding discovery action items	Discovery (Non-Deposition)
10/1/2021	Rachel Steyer	0.2	\$750	\$150	looking for and forwarding earlier email communications with OC to GBW concerning production of residnet class lists for outreach	Discovery (Non-Deposition)
10/1/2021	Rachel Steyer	0.2	\$750	\$150	reviewing email from TCC summarizing notes from meet and confer with OC	Discovery (Non-Deposition)
10/1/2021	Rachel Steyer	0.2	\$750	\$150	double checking status of case law circualted by GBW and whether it is good/current law	Misc. Research
10/1/2021	Travis Close	0.9	\$850	\$765	Meet and confer call with MTJ, defendants re: hard drives, expert depositions, missing assessment data, and resident files	Case Organization, Planning and Strategy
10/1/2021	Travis Close	0.4	\$850	\$340	Review, analyze and revise draft letter brief re: failure to produce contracts showing subsidiary interest in facilities	Case Organization, Planning and Strategy
10/1/2021	Travis Close	0.3	\$850	\$255	Review and analyze Def's responses and objections to fifth set of doc requests	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/1/2021	Travis Close	0.6	\$850	\$510	Review and analyze floor plans referenced in today's call; download & send to staffing experts	Discovery (Non-Deposition)
10/1/2021	Travis Close	0.3	\$850	\$255	Call with MTJ re: motion to compel contracts & third party agreements	Discovery (Non-Deposition)
10/1/2021	Travis Close	1.3	\$850	\$1,105	Review and analyze other floor plans previously unseen from defendants' recent productions	Discovery (Non-Deposition)
10/4/2021	Guy Wallace	0.5	\$1,350	\$675	review and analysis of D's proposed extension of time re class cert opposition; com's with GG; MTJ re same	Class Certification
10/4/2021	Guy Wallace	0.4	\$1,350	\$540	com's with PK; DTM; MTJ re expert depo schedule	Depositions
10/4/2021	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ; RAB re construction history analysis; review and analysis of 2010 ADAS re definition of alterations	Discovery (Non-Deposition)
10/4/2021	Guy Wallace	0.5	\$1,350	\$675	review and analysis of P's Initial Disclosures; need for supplementation; com's with RLS re same	Discovery (Non-Deposition)
10/4/2021	Guy Wallace	0.9	\$1,350	\$1,215	legal research and analysis re D's contention that statutory minimum damages under the Unruh Act are unconstitutional as excessive; com's with MTJ re same (.1)	Misc. Research
10/4/2021	Mark Johnson	1.9	\$1,150	\$2,185	work on memo re evidence of BKD operation of facilities; review docs for same	Case Organization, Planning and Strategy
10/4/2021	Mark Johnson	0.3	\$1,150	\$345	emails to Kailes and Cross re deposition scheduling	Depositions
10/4/2021	Mark Johnson	0.3	\$1,150	\$345	calls w/ GBW re construction history discovery and research	Discovery (Non-Deposition)
10/4/2021	Mark Johnson	2.2	\$1,150	\$2,530	work on preparation of additional document requests, including review of Bowman deposition testimony and exhibits for same	Discovery (Non-Deposition)
10/4/2021	Mark Johnson	0.5	\$1,150	\$575	review of Schroyer dec in related case for understanding of issues related to .mod files and .pkg files.	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/4/2021	Mark Johnson	0.4	\$1,150	\$460	video conference w/ RAB, TCC, EO re construction history project	Experts (Including Retention)
10/4/2021	Mark Johnson	0.4	\$1,150	\$460	review and edit spreadsheet of constrution history	Misc. Research
10/4/2021	Mark Johnson	0.2	\$1,150	\$230	review proposed stip from Ds for extension of time to prepare opposition; com w/ COC re same	Other Motions
10/4/2021	Rachel Steyer	0.2	\$750	\$150	reviewing initial rule 26a plaintiffs' disclosures	Discovery (Non-Deposition)
10/4/2021	Rachel Steyer	1.3	\$750	\$975	starting work on preparing supplemental to p's initial rule 26 disclosures	Discovery (Non-Deposition)
10/4/2021	Rachel Steyer	0.2	\$750	\$150	reviewing FRCP rule 26 in preparing supplemental plaintiffs' initial disclosures	Misc. Research
10/4/2021	Travis Close	0.4	\$850	\$340	Review and analyze EPO's updated construction history timeline and spreadsheet in advance of today's meeting	Case Organization, Planning and Strategy
10/4/2021	Travis Close	0.8	\$850	\$680	Meeting with EPO, MTJ, RAB re: updated construction history spreadsheet	Case Organization, Planning and Strategy
10/4/2021	Travis Close	1.2	\$850	\$1,020	Legal research re DOJ regulations for alterations of facilities and cases describing what constitutes "usability"	Case Organization, Planning and Strategy
10/4/2021	Travis Close	0.2	\$850	\$170	Review and analyze Brookdale's request for extension of schedule for filing Opposition papers	Case Organization, Planning and Strategy
10/4/2021	Travis Close	0.8	\$850	\$680	Analyze documents showing BKD's central control of facility budgets under custodian Kevin Bowman (search: control w/5 budget*)	Discovery (Non-Deposition)
10/4/2021	Travis Close	1.1	\$850	\$935	Collect, organize and analyze Wage Analyzes produced for Brookdale facilities	Discovery (Non-Deposition)
10/5/2021	Guy Wallace	0.5	\$1,350	\$675	legal research and analysis re Ninth Circuit's decision in CREEC case re Defendant's status as a REIT precluded commonality	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/5/2021	Mark Johnson	1.7	\$1,150	\$1,955	continue working on memo identifying factors for unity of interest with BSL subsidiaries and evidence of operation; review expert disclosures and 30b6 testimony in related case for same.	Case Organization, Planning and Strategy
10/5/2021	Mark Johnson	0.1	\$1,150	\$115	call w/ GBW re Kailes deposition and D's requested extension of time.	Depositions
10/5/2021	Mark Johnson	0.3	\$1,150	\$345	calls w/ R Stiner re depo scheduling and related issues	Depositions
10/5/2021	Mark Johnson	0.3	\$1,150	\$345	calls and emails w/ June Kailes re depo scheduling and conflicts; alternative scenarios	Depositions
10/5/2021	Mark Johnson	0.1	\$1,150	\$115	follow-up email with OC re confirming deposition schedules.	Depositions
10/5/2021	Mark Johnson	0.1	\$1,150	\$115	email exchange w/ M Jacobsen re Schroyer and Flores depos.	Depositions
10/5/2021	Mark Johnson	0.1	\$1,150	\$115	call w/ Stacy Stiner re depo scheduling	Depositions
10/5/2021	Mark Johnson	0.2	\$1,150	\$230	email exchanges w/ OC depo scheduling of experts Kailes, Cross, Mastin, Flores and Schroyer	Depositions
10/5/2021	Mark Johnson	0.2	\$1,150	\$230	email exchanges w/ COC Yellin re Plaintiff depo schedule	Depositions
10/5/2021	Mark Johnson	0.1	\$1,150	\$115	review email from OC re expert file production and format of same; email co-counsel re same	Discovery (Non-Deposition)
10/5/2021	Mark Johnson	0.3	\$1,150	\$345	review article from COC re Bowman promotion; research re recent BKD management changes; com w/ COC re same	Misc. Research
10/5/2021	Mark Johnson	1.8	\$1,150	\$2,070	review BKD-Emeritus merger agreement; sampling of management agreements and BSL-Summerville at Cobbco agreement for background and understanding of corporate structure and information supporting BSL ownership/operation of facilities.	Misc. Research

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/5/2021	Mark Johnson	1.1	\$1,150	\$1,265	revise proposed stipulation from OC re extension of deadline for filing response in opposition to class cert motion; email exchange w/ COC Yellin and make further revisions based on same.	Other Motions
10/5/2021	Travis Close	1.3	\$850	\$1,105	Analyze lateste DSS facility updates (complaint investigation & facility evaluation reports) for Brookdale santa monica gardens, irvine, folsom, kettleman lane, and san jose	Case Organization, Planning and Strategy
10/5/2021	Travis Close	0.8	\$850	\$680	Investigate SEC filings for Emeritus-Brookdale merger agreement; send to MTJ	Case Organization, Planning and Strategy
10/5/2021	Travis Close	0.7	\$850	\$595	Analyze deposition testimony for Jeffrey Toomer for evidence re: centralized control of Brookdale facilities	Depositions
10/5/2021	Travis Close	0.6	\$850	\$510	Review and analyze updated construction history spreadsheet by EPO for facilities for which we do not have sufficient history	Discovery (Non-Deposition)
10/5/2021	Travis Close	1.4	\$850	\$1,190	Analyze documents showing BKD's central control of facility budgets under custodian Jeffrey Toomer (search: control w/5 budget*)	Discovery (Non-Deposition)
10/5/2021	Travis Close	0.8	\$850	\$680	Review and analyze documents under custodian Jeffrey Toomer showing pressure on EDs and other staff to reduce overtime	Discovery (Non-Deposition)
10/5/2021	Travis Close	1.2	\$850	\$1,020	Review, analyze and ogranize Community Business Development Reports produced for various facilities	Discovery (Non-Deposition)
10/5/2021	Travis Close	0.7	\$850	\$595	Analyze staffing analyses completed by Brian J Rostek -- showing corporate control of facilities	Discovery (Non-Deposition)
10/5/2021	Travis Close	0.7	\$850	\$595	Review, analyze and organize Conessions Proposal spreadsheets showing occupancy v. revenue trends for various facilities	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/6/2021	Guy Wallace	1.2	\$1,350	\$1,620	legal research and analysis re class certification and issues re corporate entity and franchisees or local facilities	Class Certification
10/6/2021	Guy Wallace	0.4	\$1,350	\$540	com's with GG; MTJ re schedule on class certification and D's request for 3 month extension re same	Class Certification
10/6/2021	Guy Wallace	0.5	\$1,350	\$675	legal research and analysis re Ninth Circuit decision in CREEC case in which defendant's status as a REIT precluded commonality	Class Certification
10/6/2021	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ; JY; Kennedy re depo schedule	Depositions
10/6/2021	Guy Wallace	1.3	\$1,350	\$1,755	review and analysis of D's opposition to draft MTC re request for agreements between Brookdale Senior Living re own, lease, manage facilities	Other Motions
10/6/2021	Mark Johnson	0.4	\$1,150	\$460	further email exchanges w/ Kailes and Jacobsen re depo schedulng; draft email to Jacobsen identifying all confirmed and proposed depo dates and requesting detail for same	Depositions
10/6/2021	Mark Johnson	0.1	\$1,150	\$115	follow up email re D draft section of joint letter brief on agreements.	Other Motions
10/6/2021	Mark Johnson	0.5	\$1,150	\$575	call w/ GBW re letter brief on agreements.	Other Motions
10/6/2021	Mark Johnson	0.4	\$1,150	\$460	review and analysis of D section of joint ltr brief on agreements and re-read P section for potential revisions.	Other Motions
10/6/2021	Rachel Steyer	0.3	\$750	\$225	editing NRD draft declaration	Class Certification
10/6/2021	Rachel Steyer	0.2	\$750	\$150	communications with NRD on teams concerning reviewing outstanding intakes and declarations	Class Outreach and Contact
10/6/2021	Rachel Steyer	0.3	\$750	\$225	sending to GBW and MTJ updated cover letter and remaining signed authorizations to circulate to opposing counsel	Communications With Opposing Counsel
10/6/2021	Rachel Steyer	1.9	\$750	\$1,425	preparing and updating cover letter for MTJ to send to opposing counsel requesting declarant resident files	Communications With Opposing Counsel

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/6/2021	Rachel Steyer	0.2	\$750	\$150	email to GBW and MTJ responding/answering questions concerning status of POA and authorizations	Discovery (Non-Deposition)
10/6/2021	Rachel Steyer	0.2	\$750	\$150	email to RAB, JMP, EOP concerning outstanding residency agreement searches for remaining declarants to ascertain signature	Discovery (Non-Deposition)
10/7/2021	Guy Wallace	0.5	\$1,350	\$675	legal research and analysis re CREEC decision and whether Brookdale Senior Living "operates" its facilities	Class Certification
10/7/2021	Guy Wallace	0.5	\$1,350	\$675	com's with BU re D's proposed extension of schedule; review and analysis of Dkt. No. 230 re same	Class Certification
10/7/2021	Guy Wallace	2.2	\$1,350	\$2,970	review and analysis of further draft of MTC re agreements between BSL and subsidiaries; revise and edit same; com's with MTJ re same	Other Motions
10/7/2021	Mark Johnson	0.2	\$1,150	\$230	coms w/ Cross re depo scheduling and availalbity	Depositions
10/7/2021	Mark Johnson	0.3	\$1,150	\$345	review and draft responses to emails from OC re Cross depo and proposal to have depositions in person.	Depositions
10/7/2021	Mark Johnson	0.3	\$1,150	\$345	calls (x2) w/ GBW re implications of Sunrise dispute re mod/pkg files on similar issue in this case and strategy for addressing same	Discovery (Non-Deposition)
10/7/2021	Mark Johnson	0.3	\$1,150	\$345	draft proposed email to OC re production of pkg files in locked mode and com w/ COC re same.	Experts (Including Retention)
10/7/2021	Mark Johnson	3.4	\$1,150	\$3,910	re-work letter brief on mtn to compel agreements re ownership and operation	Other Motions
10/7/2021	Mark Johnson	1.1	\$1,150	\$1,265	calls (x3) w/ GBW re revisions to letter brief to compel agreements re ownership and operations of facilities.	Other Motions
10/7/2021	Rachel Steyer	0.3	\$750	\$225	editing NRD draft declaration	Class Certification
10/7/2021	Rachel Steyer	0.2	\$750	\$150	communications with NRD on teams concerning outstanding review of intakes and declarations	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/7/2021	Rachel Steyer	4.2	\$750	\$3,150	editing and revising updated draft plaintiffs supplemental FRCP rule 26 initial disclosures	Discovery (Non-Deposition)
10/7/2021	Travis Close	0.8	\$850	\$680	Investigate SEC/Edgar database for Emeritus-Brookdale merger agreement	Case Organization, Planning and Strategy
10/7/2021	Travis Close	1.3	\$850	\$1,105	Invesrtigate Brookdale and Emeritus SEC/Edgar filings for parent disclosure letter and company disclosure letter	Case Organization, Planning and Strategy
10/7/2021	Travis Close	0.3	\$850	\$255	Call with MTJ re: status of subpoena responses and next steps for depo prep	Depositions
10/7/2021	Travis Close	0.7	\$850	\$595	Review and analyze productions by Defendants and CDSS for Brookdale-Emeritus Merger agreement	Discovery (Non-Deposition)
10/7/2021	Travis Close	0.5	\$850	\$425	Review and analyze newly updated version of construction history spreadsheet to prioritize which jurisdictions must produce additional construction/permit documents	Discovery (Non-Deposition)
10/7/2021	Travis Close	0.8	\$850	\$680	Create chart of facility jurisdictions for which we are missing info to analyze/organize/manage retrieval of supplemental records	Discovery (Non-Deposition)
10/7/2021	Travis Close	0.8	\$850	\$680	Search for regional building records jurisdiction (within LA county) responsible for maintaining records at Brookdale Walnut	Discovery (Non-Deposition)
10/7/2021	Travis Close	0.3	\$850	\$255	Analyze scope of subpoena that was sent to Brookdale Walnut and responses to determine records missing & contact info for followup	Discovery (Non-Deposition)
10/7/2021	Travis Close	0.5	\$850	\$425	Research date of construction for Brookdale Walnut using LA Dept of Public Works databsaes	Discovery (Non-Deposition)
10/8/2021	Guy Wallace	1.1	\$1,350	\$1,485	prepare for and participate in team ZOOM re discovery; schedule; depositions; Rule 26 supplementation; construction history; class outreach and further class list	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/8/2021	Guy Wallace	0.7	\$1,350	\$945	com's with DTM; CJH; MTJ re production of .pkg files to Defendants	Discovery (Non-Deposition)
10/8/2021	Guy Wallace	0.9	\$1,350	\$1,215	revise and edit draft MTJ re management, operation and/or lease agreements re Brookdale; com's with MTJ re same	Other Motions
10/8/2021	Mark Johnson	1.0	\$1,150	\$1,150	team zoom meeting re depositions, additional discovery, motions to compel	Case Organization, Planning and Strategy
10/8/2021	Mark Johnson	0.2	\$1,150	\$230	email to COC re Cross depo and need for response to proposed dates on others.	Depositions
10/8/2021	Mark Johnson	0.6	\$1,150	\$690	review COC edits to draft email re production of protected pkg files, make further revisions and send to OC; review response from OC re need to meet and confer and draft proposed response to same for COC review	Discovery (Non-Deposition)
10/8/2021	Mark Johnson	3.5	\$1,150	\$4,025	re-work P section of joint letter brief re managment, ownership agreement, incorporate GBW suggestions.	Other Motions
10/8/2021	Mark Johnson	0.5	\$1,150	\$575	review further revisions from GBW to draft letter brief re agreements; finalize same and send to OC with cover email	Other Motions
10/8/2021	Rachel Steyer	1.0	\$750	\$750	meeting with GBW, TCC, MTJ and cocounsel to discuss outstanding discovery issues and planning concerning class cert	Case Organization, Planning and Strategy
10/8/2021	Rachel Steyer	0.3	\$750	\$225	editing and revising NRD draft declaration	Class Certification
10/8/2021	Rachel Steyer	0.3	\$750	\$225	editing adn reviewing NRD draft declaration	Class Certification
10/8/2021	Rachel Steyer	0.2	\$750	\$150	communications with NRD on teams concerning declarations	Class Outreach and Contact
10/8/2021	Rachel Steyer	0.5	\$750	\$375	reviewing RBGG memo for depo prep, adding in questions	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/8/2021	Travis Close	0.6	\$850	\$510	Meeting with LEC re: depo prep assignment for June Kailes and Doug Cross	Case Organization, Planning and Strategy
10/8/2021	Travis Close	1.1	\$850	\$935	Team meeting with MTJ, GBW, co-counsel re: depo prep strategy; def's request for extension; new discovery requests and joint letter brief re: agreements	Case Organization, Planning and Strategy
10/8/2021	Travis Close	0.9	\$850	\$765	Research private agencies for investigating and obtaining public records from city/county jurisdictions regarding constructions and alterations	Case Organization, Planning and Strategy
10/8/2021	Travis Close	0.3	\$850	\$255	Email to RAB re: depo prep assignment -- expert disclosures hosted on FTP site	Case Organization, Planning and Strategy
10/8/2021	Travis Close	0.2	\$850	\$170	Email to RAB re: doc review assignment -- bates numbers referenced in expert disclosures	Case Organization, Planning and Strategy
10/8/2021	Travis Close	0.3	\$850	\$255	Analyze records produced for Brookdale Walnut from LA Dept of Building Safety, La Puente division	Case Organization, Planning and Strategy
10/8/2021	Travis Close	0.2	\$850	\$170	Call to LA Dept of Building Safety, La Puente division re: need specific building records to establish construction date	Case Organization, Planning and Strategy
10/8/2021	Travis Close	0.2	\$850	\$170	Call to Florentine Gonzalez (La Puente) re: need specific building records to establish construction date for Brookdale Walnut	Case Organization, Planning and Strategy
10/8/2021	Travis Close	0.2	\$850	\$170	Call to City of Westminster re: following up on deficient subpoena response and request for specific building records for 15302 Brookhurst Street.	Case Organization, Planning and Strategy
10/8/2021	Travis Close	0.3	\$850	\$255	Analyze records produced for Brookdale Brookhurst from City of Westminster to determine contact info of custodian of records & what necessary records are missing	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/8/2021	Travis Close	0.5	\$850	\$425	Analyze records produced for Brookdale Central Whittier from City of Whittier to determine contact info of custodian of records & what necessary records are missing	Case Organization, Planning and Strategy
10/8/2021	Travis Close	0.3	\$850	\$255	Call to City of Whittier re: how to obtain specific records showing date of construction for address at 8101 Painter Ave	Case Organization, Planning and Strategy
10/8/2021	Travis Close	0.6	\$850	\$510	Review and analyze strategy memo from co-counsel re: Topics of focus for deposition prep	Depositions
10/8/2021	Travis Close	1.0	\$850	\$850	Legal research re: whether parties have a right to take depositions in person in light of recent progress on COVID pandemic; whether compelling circumstances are necessary	Depositions
10/8/2021	Travis Close	0.5	\$850	\$425	Review and make revisions to revised joint letter brief re: contracts and agreements showing third party interests in facilities	Discovery (Non-Deposition)
10/9/2021	Guy Wallace	0.7	\$1,350	\$945	legal research and analysis re whether P's are required to identify the class members at the class certification stage; preparation of response to D's discovery re same	Discovery (Non-Deposition)
10/10/2021	Rachel Steyer	1.3	\$750	\$975	updating draft of p's supplemental/updated rule 26 initial disclosures	Discovery (Non-Deposition)
10/11/2021	Mark Johnson	1.5	\$1,150	\$1,725	draft outline of response to D mtn for extension of time.	Other Motions
10/11/2021	Mark Johnson	0.4	\$1,150	\$460	review D mtn for extension of response time on class cert brief, declaration iso same and proposed order	Other Motions
10/11/2021	Mark Johnson	0.1	\$1,150	\$115	call w/ GBW re D mtn for extension of deadline	Other Motions
10/11/2021	Rachel Steyer	0.6	\$750	\$450	editing and revising NRD draft declarations	Class Certification
10/11/2021	Rachel Steyer	0.2	\$750	\$150	communications with NRD about preparing declarations	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/11/2021	Rachel Steyer	0.8	\$750	\$600	preparing and finalizing draft of supplemented/updated P's initial rule 26 disclosures before submitting to GBW for review	Discovery (Non-Deposition)
10/11/2021	Travis Close	0.9	\$850	\$765	Review and analyze correspondence with Doug Cross to determine docs necessary for depo prep	Case Organization, Planning and Strategy
10/11/2021	Travis Close	0.3	\$850	\$255	Meet with LEC re: dep prep assignment for June Kailes and Doug Cross	Case Organization, Planning and Strategy
10/11/2021	Travis Close	0.3	\$850	\$255	Call back from City of Westminster re: how to request records for brookdale brookhurst	Case Organization, Planning and Strategy
10/11/2021	Travis Close	0.3	\$850	\$255	Call to City Clerk (Brookdale corona) re: obtaining records for facility at 737 Magnolia Ave (Brookdale Magnolia)	Case Organization, Planning and Strategy
10/11/2021	Travis Close	0.3	\$850	\$255	File PRA request for City of Corona -- 737 Magnolia Ave (Brookdale Magnolia)	Case Organization, Planning and Strategy
10/11/2021	Travis Close	0.2	\$850	\$170	Email to EPO re: new records obtained for santa monica and santa monica gardens facilities	Case Organization, Planning and Strategy
10/11/2021	Travis Close	0.3	\$850	\$255	Review and analyze outline of class rep depo questions by BMU	Depositions
10/11/2021	Travis Close	1.5	\$850	\$1,275	Prepare PRA request to city of Westminster (15302 Brookhurst St) + attachment; sent to appropriate custodians	Discovery (Non-Deposition)
10/11/2021	Travis Close	1.4	\$850	\$1,190	PRA request - City of Whittier - draft request for docs (8101 Painter Ave - Central Whittier) + attachment and sent to City of Whittier	Discovery (Non-Deposition)
10/11/2021	Travis Close	0.4	\$850	\$340	Analyze content and sufficiency of records produced by City of Corona (Brookdale Magnolia) to determine follow-ups necessary	Discovery (Non-Deposition)
10/11/2021	Travis Close	0.7	\$850	\$595	Prepare PRA request for County of Riverside (Brookdale Riverside) for records evidencing date of construction; send to appropriate custodian	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/11/2021	Travis Close	0.2	\$850	\$170	Call to Ms. Camarena (records custodian) @ City of San Marcos re: obtaining specific docs evidencing date of construction	Discovery (Non-Deposition)
10/11/2021	Travis Close	1.2	\$850	\$1,020	Analyze records on City of Santa Monica website to obtain original application for building permit & certificate of occupancy for facilities at 851 2nd St and 2107 Ocean Ave	Discovery (Non-Deposition)
10/12/2021	Guy Wallace	0.4	\$1,350	\$540	com's with Maatman; Waters re proposed dates for deposition	Depositions
10/12/2021	Guy Wallace	0.4	\$1,350	\$540	review and analysis of draft supplemental answers to D's Interrogatories to Algarme	Discovery (Non-Deposition)
10/12/2021	Guy Wallace	2.6	\$1,350	\$3,510	review and analysis of D's Rule 7-11 motion; com's with MTJ re opposition thereto	Other Motions
10/12/2021	Mark Johnson	0.3	\$1,150	\$345	call w/ client Stiner re recent developments, depo schedule	Class Certification
10/12/2021	Mark Johnson	0.5	\$1,150	\$575	review internet sites and BSL links to info supporting BSL operations of facilities, including review of interview on line of C Baier; update memo re evidence of BSL as operator and coms w/ COC re same	Class Certification
10/12/2021	Mark Johnson	0.2	\$1,150	\$230	email exchange w/ D Cross re depo scheduling	Depositions
10/12/2021	Mark Johnson	0.7	\$1,150	\$805	review draft supp responses to rogs from Algarme; coms w/ JY re same	Discovery (Non-Deposition)
10/12/2021	Mark Johnson	0.3	\$1,150	\$345	email exchanges w/ J Mastin and w/ TCC, EO re construction histories	Experts (Including Retention)
10/12/2021	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW re response to D motion for extension of time, issues related to expert disclosures	Other Motions
10/12/2021	Mark Johnson	0.7	\$1,150	\$805	calls (x2) w/ GBW re response to D mtn to extend time for class cert response and D's factual support for same, points to make in rebuttal.	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/12/2021	Mark Johnson	5.2	\$1,150	\$5,980	work on dec in response to mtn to extend time for class cert response, including research of prior communications re depo scheduling, expert materials; work on response to mtn	Other Motions
10/12/2021	Rachel Steyer	0.3	\$750	\$225	editing and revising NRD draft declaration	Class Certification
10/12/2021	Rachel Steyer	0.4	\$750	\$300	editing and revising NRD declaration	Class Certification
10/12/2021	Rachel Steyer	0.2	\$750	\$150	communications with NRD on teams concerning declarations	Class Certification
10/12/2021	Travis Close	1.7	\$850	\$1,445	Research prior expert testimony by Douglas Cross in prior litigation (Horton et al v. LACMTA et al)	Case Organization, Planning and Strategy
10/12/2021	Travis Close	1.1	\$850	\$935	Reaerch prior litigation history and testimony for June Kailes	Depositions
10/12/2021	Travis Close	1.3	\$850	\$1,105	Reaerch prior litigation history and testimony for June Kailes - California Foundation for Indepdend. Living Ctrs v. Sacramento (depo prep)	Depositions
10/12/2021	Travis Close	0.9	\$850	\$765	Reaerch prior litigation history and testimony for June Kailes - Brooklyn Center for Independence of the Disabled, et al. v. City of New York (depo prep)	Depositions
10/12/2021	Travis Close	0.3	\$850	\$255	Call back from City of Westminster re: scope of records sought in PRA	Discovery (Non-Deposition)
10/12/2021	Travis Close	0.6	\$850	\$510	Analyze new facility evaluation and complaint investigation reports issued for San Ramon, Santa Monica Gardens, Napa, Folsom, Valley View, San Jose	Discovery (Non-Deposition)
10/12/2021	Travis Close	1.1	\$850	\$935	Reaerch prior litigation history and testimony for June Kailes - Communities Actively Living Independent and Free, et al. v. City of Los Angeles (depo prep)	Discovery (Non-Deposition)
10/12/2021	Travis Close	0.3	\$850	\$255	Review and analyze Dec of Doug Cross for info on prior litigation testimony	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/12/2021	Travis Close	0.3	\$850	\$255	Review and analyze Dec of June Kailes for info on prior litigation testimony	Experts (Including Retention)
10/12/2021	Travis Close	0.4	\$850	\$340	Review/analyze Dec of June Kailes filed in Communities Actively Living Independent and Free et al v. City of Los Angeles et al for references to deficiencies in emergency evacuation and transportation (depo prep)	Experts (Including Retention)
10/13/2021	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ; RLS re responses to D's further interrogatories and objections re same	Discovery (Non-Deposition)
10/13/2021	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re preparation of P's further written discovery and schedule re same	Discovery (Non-Deposition)
10/13/2021	Guy Wallace	1.2	\$1,350	\$1,620	review and analysis of draft supplemental disclosures prepared by RLS	Discovery (Non-Deposition)
10/13/2021	Guy Wallace	0.9	\$1,350	\$1,215	com's with MTJ re preparation of opposition to D's motion re extension of class cert schedule	Other Motions
10/13/2021	Mark Johnson	1.1	\$1,150	\$1,265	call w/ GBW re strategy for response to D motion to extend time for class cert briefing, responses to Ds interrogatories, depo prep for expert witnesses	Case Organization, Planning and Strategy
10/13/2021	Mark Johnson	0.2	\$1,150	\$230	coms (x2) w/ D Cross re keeping depo date open, confirmation of depo, scheduling prep session.	Depositions
10/13/2021	Mark Johnson	0.2	\$1,150	\$230	draft email to OC re confirmation of Cross and other expert depositions, instructions for same; proposal for Flores, Kennedy depositions.	Depositions
10/13/2021	Mark Johnson	0.5	\$1,150	\$575	calls (x3) with RLS re draft responses to D's second set of interrogatories, review of same and proposed objections.	Discovery (Non-Deposition)
10/13/2021	Mark Johnson	0.7	\$1,150	\$805	review latest iteration of spreadsheet documenting construction history; draft email to J Mastin identifying status re same and additional research to be done.	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/13/2021	Mark Johnson	5.8	\$1,150	\$6,670	continue working on response to D mtin for additional time to file class cert opposition and declaration in support of same	Other Motions
10/13/2021	Mark Johnson	0.1	\$1,150	\$115	email exchange w/ D Marks re opp to mtn for extension of time, info needed for same, scheduling call to discuss.	Other Motions
10/13/2021	Rachel Steyer	0.3	\$750	\$225	call with MTJ to discuss and review preparing ROG responses	Discovery (Non-Deposition)
10/13/2021	Rachel Steyer	0.2	\$750	\$150	communications with NRD and NCN about declarations and communications with declarants concerning authorizations	Discovery (Non-Deposition)
10/13/2021	Rachel Steyer	4.2	\$750	\$3,150	drafting and preparing Ps response to Ds Second set of ROGs	Discovery (Non-Deposition)
10/13/2021	Rachel Steyer	0.3	\$750	\$225	call with MTJ to discuss question in preparing ROG response	Experts (Including Retention)
10/13/2021	Travis Close	0.3	\$850	\$255	Call back from San Marcos City Clerk re: building records requested for Brookdale San Marcos	Case Organization, Planning and Strategy
10/13/2021	Travis Close	0.8	\$850	\$680	Calls to LA Dept of Public Works to find out who to contact for PRA request (19850 Colima Rd)	Case Organization, Planning and Strategy
10/13/2021	Travis Close	0.3	\$850	\$255	Meet with LEC re: docs for depo prep for June Kailes/Doug Cross	Depositions
10/13/2021	Travis Close	0.2	\$850	\$170	Email to MTJ, LEC re: outline of prior expert testimony	Depositions
10/13/2021	Travis Close	0.5	\$850	\$425	Continue outline of prior expert testimony - June Kailes and Doug Cross	Depositions
10/13/2021	Travis Close	1.6	\$850	\$1,360	Draft PRA request for Brookdale San Marcos; send to appropriate custodian at City Clerk's Office	Discovery (Non-Deposition)
10/13/2021	Travis Close	0.3	\$850	\$255	Call to City of Walnut re: request for building records at 19850 Colima, Walnut	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/13/2021	Travis Close	1.3	\$850	\$1,105	Draft public records act request for Brookdale Walnut to City of Walnut; send to custodian at Walnut City Clerk's Office	Discovery (Non-Deposition)
10/13/2021	Travis Close	0.3	\$850	\$255	Call to City of Diamond Bar re: request for records at 19850, Walnut	Discovery (Non-Deposition)
10/13/2021	Travis Close	0.8	\$850	\$680	Draft public records act request for Brookdale Walnut to City of Diamond Bar; email form submission to City Clerk's Office	Discovery (Non-Deposition)
10/13/2021	Travis Close	1.1	\$850	\$935	Draft PRA request to LA DPW for facility at 19850 Colima Rd; send to appropriate agent	Discovery (Non-Deposition)
10/13/2021	Travis Close	1.3	\$850	\$1,105	Review and analyze docket in Brooklyn Center For Independence of the Disabled et al v. De Blasio et al for references to June Kailes testimony	Experts (Including Retention)
10/14/2021	Guy Wallace	0.9	\$1,350	\$1,215	preparation of topics and questions re depo of Kailes; com's with MTJ; TCC re same	Depositions
10/14/2021	Guy Wallace	0.6	\$1,350	\$810	review and analysis of Marks memo re Schroyer work; .mod files (unprotected vs. protected); .pkg files	Discovery (Non-Deposition)
10/14/2021	Guy Wallace	0.9	\$1,350	\$1,215	com's with DTM; JT; MTJ re protected vs. unprotected .mod files; P's position re same	Experts (Including Retention)
10/14/2021	Guy Wallace	4.4	\$1,350	\$5,940	review and analysis of draft of opposition to D's motion for extension pursuant to L.R. 7-11; MTJ Declaration re same; revise and edit same; com's with MTJ re same (.6)	Other Motions
10/14/2021	Guy Wallace	0.8	\$1,350	\$1,080	revise and edit further draft of opposition to D's L.R. 7-11 motion re class cert schedule	Other Motions
10/14/2021	Mark Johnson	0.2	\$1,150	\$230	email exchange w/ J Kailes re depo prep	Depositions
10/14/2021	Mark Johnson	0.3	\$1,150	\$345	preliminary review of docs on Kailes link for depo prep.	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/14/2021	Mark Johnson	0.2	\$1,150	\$230	draft email to J Kailes with schedule for depo and depo prep and other informaiton	Depositions
10/14/2021	Mark Johnson	0.5	\$1,150	\$575	call with June Kailes re depo and depo planning schedule	Depositions
10/14/2021	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re revisions to memo in opposition to request for extension of time, declaration.	Other Motions
10/14/2021	Mark Johnson	0.8	\$1,150	\$920	call w/ GBW, Marks, Thornton re response to D's applciation for extension of time to file opp to class cert and detail/background related to Flores/Schroyer disclosures.	Other Motions
10/14/2021	Mark Johnson	4.6	\$1,150	\$5,290	work on revisions and additons to declaration and edits to mpa in opp to D request for extensnion of deadline	Other Motions
10/14/2021	Rachel Steyer	1.1	\$750	\$825	finishing preparing draft ROG responses	Discovery (Non-Deposition)
10/14/2021	Travis Close	0.2	\$850	\$170	Email to EPO re: records produced by county of riverside	Case Management Conferences
10/14/2021	Travis Close	0.2	\$850	\$170	Email to MTJ re: assistance needed for Kailes depo prep	Case Organization, Planning and Strategy
10/14/2021	Travis Close	0.4	\$850	\$340	Review/revise draft supplemental ROG responses from Algarne	Case Organization, Planning and Strategy
10/14/2021	Travis Close	0.2	\$850	\$170	Call to GBW re: attending Kailes depo and depo prep	Case Organization, Planning and Strategy
10/14/2021	Travis Close	1.6	\$850	\$1,360	Analyze supplement emergency evacuation & disaster plans for variation in key points/omissions addressed in Kailes declaration	Depositions
10/14/2021	Travis Close	0.2	\$850	\$170	Email to GBW re: additional supplemental emergency evacuation plans to send to June Kailes for depo prep	Depositions
10/14/2021	Travis Close	0.6	\$850	\$510	Analyze testimony in Kailes declaration re: supplemental emergency plans and compare to recently produced supplemental plans	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/14/2021	Travis Close	1.2	\$850	\$1,020	Draft PRA request to County of Riverside Building & Safety Dept & send to appropriate custodian	Discovery (Non-Deposition)
10/14/2021	Travis Close	0.3	\$850	\$255	Call to Jurupa Valley City Clerk re: how to obtain records of date of construction at 5881 El Palomino Dr	Discovery (Non-Deposition)
10/14/2021	Travis Close	1.1	\$850	\$935	Draft PRA Request for City of Jurupa Valley (5881 El Palomino Dr) and email to City Clerk's office	Discovery (Non-Deposition)
10/14/2021	Travis Close	0.3	\$850	\$255	Email to June Kailes re: instructions for reviewing supplemental plans and comparing to declaration (depo prep)	Experts (Including Retention)
10/14/2021	Travis Close	0.5	\$850	\$425	Review, analyze & revise draft opposition to admin motion to extend time	Pleadings and Motions Re: Pleadings
10/15/2021	Guy Wallace	0.3	\$1,350	\$405	com's with DTM; JT; MTJ re com's from Maatman and protected files and response thereto	Communications With Opposing Counsel
10/15/2021	Guy Wallace	2.4	\$1,350	\$3,240	revise and edit opposition to D's Rule 7-11 motion; MTJ declaration re same; com's with MTJ re same (.4)	Other Motions
10/15/2021	Mark Johnson	0.2	\$1,150	\$230	call w/ June Kailes and TCC re additional documents to review for depo	Depositions
10/15/2021	Mark Johnson	1.0	\$1,150	\$1,150	coms w/ LEC and TCC re document pull for depo prep w/ June Kailes; preliminary review of docs and disclosures; com w/ TCC re logistics.	Depositions
10/15/2021	Mark Johnson	2.4	\$1,150	\$2,760	work on responses to D's second set of interrogatories to Lindstrom	Discovery (Non-Deposition)
10/15/2021	Mark Johnson	0.1	\$1,150	\$115	email exchange w/ RLS re draft responses to 2nd set of rog	Discovery (Non-Deposition)
10/15/2021	Mark Johnson	0.4	\$1,150	\$460	email exchange w OC re mod/pkg file production, alleged deficiencies and meeting and conferring re same.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/15/2021	Mark Johnson	0.3	\$1,150	\$345	calls and email exchanges w/ Marks, GBW re D assertions of deficiencies in mod/pkg files and responses to same, scheduling meet and confer.	Discovery (Non-Deposition)
10/15/2021	Mark Johnson	0.4	\$1,150	\$460	review authorizations from additional declarants, revise cover letter for same and draft email to D re request for resident files #10 (15)	Discovery (Non-Deposition)
10/15/2021	Mark Johnson	0.6	\$1,150	\$690	calls w/ GBW (x3) re Kailes depo and prep, opp to mtn for extension of time to file response to class cert brief	Other Motions
10/15/2021	Mark Johnson	0.4	\$1,150	\$460	review Crandall declaration in related case for arguments to be made by Def re Schroyer data	Other Motions
10/15/2021	Mark Johnson	2.0	\$1,150	\$2,300	revise and finalize opposition to D's admin mtn for additional time to oppose class cert mtn and dec in support of opposition	Other Motions
10/15/2021	Rachel Steyer	0.6	\$750	\$450	editing and revising NRD draft declarations	Class Certification
10/15/2021	Rachel Steyer	0.3	\$750	\$225	reviewing MTJ edits to draft ROGs and incorporating	Discovery (Non-Deposition)
10/15/2021	Travis Close	0.2	\$850	\$170	Meet with LEC re: depo prep files needed for June Kailes	Depositions
10/15/2021	Travis Close	1.6	\$850	\$1,360	Research & download prior publications by June Kailes (depo prep)	Depositions
10/15/2021	Travis Close	0.3	\$850	\$255	Meet with MTJ re: preparations for meeting june kailes for deposition next week	Depositions
10/15/2021	Travis Close	0.7	\$850	\$595	Create account for Jurupa Valley public records system and retrieve records for brookdale riverside	Discovery (Non-Deposition)
10/15/2021	Travis Close	0.6	\$850	\$510	Call with june kailes re: supplemental emergency evac plans; plans for depo prep next week	Experts (Including Retention)
10/15/2021	Travis Close	0.3	\$850	\$255	Email supplemental plans & final declaration to JIK for review before depo	Experts (Including Retention)
10/16/2021	Guy Wallace	0.8	\$1,350	\$1,080	com's with MTJ re whether unprotected .mod files should be produced to Defendants	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/16/2021	Mark Johnson	0.2	\$1,150	\$230	email exchange w/ June Kailes re depo prep and doc review, send docs for same	Depositions
10/16/2021	Mark Johnson	0.5	\$1,150	\$575	com w/ GBW re D mtn to extend time for clss cert opp, arguments made by defendants re protected pkg files strategy for meet and confer and case management conference.	Other Motions
10/17/2021	Guy Wallace	2.4	\$1,350	\$3,240	review and analysis of Kailes Declaration; preparation of potential topics and questions re D's depo of Kailes	Depositions
10/17/2021	Mark Johnson	1.4	\$1,150	\$1,610	review Kailes declaration iso clas cert and begin drafting potential depo questions for depo prep.	Depositions
10/17/2021	Mark Johnson	0.4	\$1,150	\$460	draft follow-up email to COC Marks, Thornton others re points to discuss in call to prep for meet and confer w/ OC re .mod / pkg files.	Other Motions
10/18/2021	Guy Wallace	2.1	\$1,350	\$2,835	review and analysis of Kailes declaration; preparation of potential questions and topics from Defendants re Kailes deposition	Depositions
10/18/2021	Guy Wallace	1.4	\$1,350	\$1,890	com's with DTM; JT; MTJ; BU re production of protected vs. unprotected .mod files to Defendants	Discovery (Non-Deposition)
10/18/2021	Guy Wallace	0.3	\$1,350	\$405	com's with D's re production of protected vs. unprotected .mod files	Discovery (Non-Deposition)
10/18/2021	Guy Wallace	1.4	\$1,350	\$1,890	zoom w/ Kailes; MTJ; TCC re preparation for deposition	Experts (Including Retention)
10/18/2021	Guy Wallace	0.4	\$1,350	\$540	review and analysis of D's revised version of MTC re agreements; com's with MTJ re same	Other Motions
10/18/2021	Mark Johnson	1.5	\$1,150	\$1,725	remote video depo prep session w/ June Kailes, TCC, GBW	Depositions
10/18/2021	Mark Johnson	0.3	\$1,150	\$345	calls w/ GBW re prep for Kailes depo, issues to be addressed, potential questions.	Depositions
10/18/2021	Mark Johnson	3.0	\$1,150	\$3,450	review materials related to Kailes depo and work on list of subject areas and questions to be prepared for	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/18/2021	Mark Johnson	0.3	\$1,150	\$345	meet and confer call w/ OC Maatman and Jacobsen re .mod/pkg files	Discovery (Non-Deposition)
10/18/2021	Mark Johnson	0.9	\$1,150	\$1,035	conference call w Marks, Thornton, GBW, Umpierre re mod/pkg file questions and prep for meet and confer, arguments for likely mtn to compel	Discovery (Non-Deposition)
10/18/2021	Mark Johnson	0.2	\$1,150	\$230	calls w/ GBW re mod/pkg files and protective order	Discovery (Non-Deposition)
10/18/2021	Mark Johnson	0.6	\$1,150	\$690	review email from Marks based on Schroyer input re mod/pkg files for call re same, meet and confer w/ oc and potential argument on mtc	Discovery (Non-Deposition)
10/18/2021	Mark Johnson	1.3	\$1,150	\$1,495	review and make further revisions to responses to 2nd set of rogs for Stiner, Jestrabeck-Hart and Lindstrom	Discovery (Non-Deposition)
10/18/2021	Mark Johnson	0.5	\$1,150	\$575	review and analyze D's revised section of joint ltr brief on ownership/operations agreements; com w/ GBW and TCC re same; review compare doc prepared by TCC	Other Motions
10/18/2021	Mark Johnson	0.2	\$1,150	\$230	review final for filing of ltr brief and exhibits and com w/ LEC re same	Other Motions
10/18/2021	Mark Johnson	0.5	\$1,150	\$575	call w/ gbw, GCG re strategy for hearing with the court re D requested extension of time.	Other Motions
10/18/2021	Rachel Steyer	0.2	\$750	\$150	received follow up call from family member of deceased resident, wanted update on class cert, indicated brother will follow up to discuss intake/declaration	Class Outreach and Contact
10/18/2021	Rachel Steyer	0.3	\$750	\$225	spoke with class member, discussed case, scheduled intake call	Class Outreach and Contact
10/18/2021	Rachel Steyer	1.3	\$750	\$975	editing and updating ROG responses based on MTJ feedback	Discovery (Non-Deposition)
10/18/2021	Rachel Steyer	0.2	\$750	\$150	reviewing defendants' revised portion of discovery letter brief as circulated by opposing counsel	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/18/2021	Travis Close	0.4	\$850	\$340	Review and analyze emergency evacuation statue for RCFE facilities in CA	Case Organization, Planning and Strategy
10/18/2021	Travis Close	0.5	\$850	\$425	Meet with LEC re: gathering materials before depo prep & depo with June Kailes	Depositions
10/18/2021	Travis Close	0.3	\$850	\$255	Review and analyze likely questions for Kailes deposition by MTJ	Depositions
10/18/2021	Travis Close	0.6	\$850	\$510	Review and analyze emergency evacuation drills for evidence of resident participation (Kailes depo prep)	Depositions
10/18/2021	Travis Close	0.5	\$850	\$425	Analyze supplemental emergency evac plan examples for evidence of policies re: resident participation (Kailes depo prep)	Depositions
10/18/2021	Travis Close	0.5	\$850	\$425	Review and analyze transcripts of Theresa Ward and Audrey Withers re: emergency evac policies (depop prep)	Depositions
10/18/2021	Travis Close	1.6	\$850	\$1,360	Meeting with GBW, MTJ, JIK re: prep for Thursday's depo	Depositions
10/18/2021	Travis Close	0.4	\$850	\$340	Compare & analyze draft changes made to Def's section of joint letter brief	Discovery (Non-Deposition)
10/18/2021	Travis Close	0.3	\$850	\$255	Email to MTJ, GBW re: changes made to Def's section of joint letter brief	Discovery (Non-Deposition)
10/18/2021	Travis Close	1.1	\$850	\$935	Review and analyze supplemental building records produced by Jurupa Valley (PRA request) for evidence of new construction	Discovery (Non-Deposition)
10/18/2021	Travis Close	0.9	\$850	\$765	Review examples of resident evacuated ability forms produced by defendants; analyze for linkage to a facility's emergency and disaster plans (depo prep)	Discovery (Non-Deposition)
10/18/2021	Travis Close	0.3	\$850	\$255	Email to JIK re: examples of completed resident evacuation ability forms	Experts (Including Retention)
10/19/2021	Guy Wallace	2.8	\$1,350	\$3,780	preparation of topics and questions re Kailes depo; com's with Kailes; MTJ; TCC re same	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/19/2021	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ re D's recent sets of interrogatories and P's draft responses thereto	Discovery (Non-Deposition)
10/19/2021	Guy Wallace	0.5	\$1,350	\$675	prepare for and participate in hearing re D's L.R. 7-11 motion re schedule	Other Motions
10/19/2021	Guy Wallace	0.5	\$1,350	\$675	com's with GG; MTJ re results of hearing with J. Gilliam re class certification schedule	Other Motions
10/19/2021	Guy Wallace	0.4	\$1,350	\$540	review and analysis of draft of proposed stipulation re class cert schedule from GG; revise and edit same; com's with GG; MTJ re same	Other Motions
10/19/2021	Guy Wallace	0.7	\$1,350	\$945	com's with GG; MTJ re preparation for hearing with J. Gilliam re D's Local Rule 7-11 motion	Other Motions
10/19/2021	Guy Wallace	0.4	\$1,350	\$540	review and analysis of D's draft MTC re unprotected .mod files; com's with MTJ re same	Other Motions
10/19/2021	Rachel Steyer	0.2	\$750	\$150	spoke with son of deceased resident, decided not to proceed with intake given that he did not hold POA	Class Outreach and Contact
10/19/2021	Rachel Steyer	0.2	\$750	\$150	document review of residency agreement prior to intake phone call with class member/family member	Discovery (Non-Deposition)
10/19/2021	Rachel Steyer	0.5	\$750	\$375	reviewing emails and documents to locate approximate number of docs produced to ds for expert witness materials to answer GBW question	Discovery (Non-Deposition)
10/19/2021	Rachel Steyer	0.3	\$750	\$225	reviewing status of ROGs per request from MTJ	Discovery (Non-Deposition)
10/19/2021	Travis Close	0.5	\$850	\$425	Review and analyze dates of construction listed in Gary and Jeff's declaration	Class Certification
10/19/2021	Travis Close	0.3	\$850	\$255	Call with GBW re: ratio of supplemental plans reviewed for JIK analysis	Class Certification
10/19/2021	Travis Close	1.3	\$850	\$1,105	BART to airport (to catch flight to LA for June Kailes expert depo/prep)	Depositions
10/19/2021	Travis Close	2.6	\$850	\$2,210	Flight to LA from SFO; taxi to hotel (for June Kailes expert depo/prep)	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/19/2021	Travis Close	0.3	\$850	\$255	Review and analyze differences in DSS LIC forms for emergency plans & supplemental plans (Kailes depo prep)	Depositions
10/19/2021	Travis Close	1.6	\$850	\$1,360	Review and analyze new production of documents received by City of Whitter for Brookdale Central Whittier;	Discovery (Non-Deposition)
10/19/2021	Travis Close	0.3	\$850	\$255	Review and analyze Def's section of joint letter brief re: MOD files	Discovery (Non-Deposition)
10/19/2021	Travis Close	0.5	\$850	\$425	Analyze size, content and quantity of Aug 25 production to defendants	Discovery (Non-Deposition)
10/19/2021	Travis Close	0.3	\$850	\$255	Email to EPO re: new assignment for analyzing dates of facility construction ID'd in expert declarations and comparing to our latest findings	Discovery (Non-Deposition)
10/19/2021	Travis Close	0.7	\$850	\$595	Analyze & compile record of docs sent to June Kailes since dec was filed	Experts (Including Retention)
10/19/2021	Travis Close	0.4	\$850	\$340	Email to GBEW re: list of documents sent to june kailes since filing of declaration	Experts (Including Retention)
10/20/2021	Guy Wallace	0.9	\$1,350	\$1,215	legal research and analysis re Briseno v. ConAgra and whether P's are required to identify putative class members in connection with class certification	Class Certification
10/20/2021	Guy Wallace	0.3	\$1,350	\$405	com's with GM; GG re stipulation re class certification schedule	Class Certification
10/20/2021	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ; TCC re preparation for deposition of Kailes; potential areas of examination	Depositions
10/20/2021	Guy Wallace	1.6	\$1,350	\$2,160	revise and edit draft interrogatory answers; com's with MTJ; RLS re same	Discovery (Non-Deposition)
10/20/2021	Guy Wallace	1.2	\$1,350	\$1,620	com's with DTM; CJH; BU; MTJ re task times identified in Exhibit 45 in the Aegis case, and their potential use in the Brookdale case; analysis of same	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/20/2021	Guy Wallace	0.8	\$1,350	\$1,080	com's with RLS re preparation of Rule 26(e) supplementation to initial disclosures; analysis of areas requiring supplementation	Discovery (Non-Deposition)
10/20/2021	Guy Wallace	0.6	\$1,350	\$810	preparation of P's points re D's motion to compel production of unprotected files	Other Motions
10/20/2021	Mark Johnson	0.1	\$1,150	\$115	call w/ GBW re task time data considered by Dr. Flores	Case Organization, Planning and Strategy
10/20/2021	Mark Johnson	4.4	\$1,150	\$5,060	depo prep session w/ June Kailes	Depositions
10/20/2021	Mark Johnson	2.8	\$1,150	\$3,220	revise and edit draft responses ot 2nd set of rogs for Jestrabekc Hart, Lindstrom, Stiner	Discovery (Non-Deposition)
10/20/2021	Mark Johnson	0.6	\$1,150	\$690	calls (.3) w/ GBW re responses to 2nd set of interrogatories (.5), additional discovery to serve on D's, depo scedule (.1)	Discovery (Non-Deposition)
10/20/2021	Mark Johnson	0.5	\$1,150	\$575	travel from hotel to expert Kailes for depo prep	Discovery (Non-Deposition)
10/20/2021	Rachel Steyer	0.6	\$750	\$450	preparing response to GBW outlining status of outreach efforts	Class Outreach and Contact
10/20/2021	Rachel Steyer	0.2	\$750	\$150	response to GBW and MTJ concerning outreach efforts	Class Outreach and Contact
10/20/2021	Rachel Steyer	0.2	\$750	\$150	response to MTJ about ROGs	Discovery (Non-Deposition)
10/20/2021	Rachel Steyer	0.2	\$750	\$150	response to GBW re ROGs	Discovery (Non-Deposition)
10/20/2021	Rachel Steyer	0.2	\$750	\$150	updated draft ROG response to include additional objection, circulated to GBW and MTJ	Discovery (Non-Deposition)
10/20/2021	Rachel Steyer	0.2	\$750	\$150	reviewing and incorporating GBW edits into draft ROG response	Discovery (Non-Deposition)
10/20/2021	Rachel Steyer	4.8	\$750	\$3,600	editing and revising ps supplemental initial disclosures following additional input from GBW	Discovery (Non-Deposition)
10/20/2021	Travis Close	0.7	\$850	\$595	Lyft e-bike rental -- commute to June Kailes' office from hotel for preparation for tomorrow's deposition	Depositions
10/20/2021	Travis Close	0.6	\$850	\$510	Commute from JIK's office to hotel after depo prep	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/20/2021	Travis Close	0.6	\$850	\$510	Travel from hotel to LAX airport before flight home to OAK	Depositions
10/20/2021	Travis Close	1.5	\$850	\$1,275	Flight from LAX to OAK airport (after Kailes depo prep)	Depositions
10/20/2021	Travis Close	1.1	\$850	\$935	BART (train) ride back from OAK airport to home --- (JIK depo prep)	Depositions
10/20/2021	Travis Close	4.7	\$850	\$3,995	Depo prep with JIK and MTJ before her deposition re: expert testimony on brookdale's emergency evacuation and disaster plans	Experts (Including Retention)
10/21/2021	Guy Wallace	1.5	\$1,350	\$2,025	preparation and analysis of tasks necessary for class certification reply; further discovery tasks; Rule 26 supplementation	Class Certification
10/21/2021	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ re expert deposition schedule and preparation re same	Depositions
10/21/2021	Guy Wallace	1.7	\$1,350	\$2,295	review and analysis of D's motion for unprotected .mod files	Other Motions
10/21/2021	Guy Wallace	2.9	\$1,350	\$3,915	preparation and drafting of opposition to Defendants' motion to compel the unprotected .mod files; com's with DTM; MTJ re same	Other Motions
10/21/2021	Mark Johnson	0.2	\$1,150	\$230	emails (x2) and call to J Mastin re depo scheduling	Depositions
10/21/2021	Mark Johnson	4.0	\$1,150	\$4,600	work on depo prep for Mastin, including review of declaration, review of construction history, notes re potential questions	Depositions
10/21/2021	Mark Johnson	0.7	\$1,150	\$805	further review and coms w/ LEC re responses to 2nd set for interrogatories.	Discovery (Non-Deposition)
10/21/2021	Mark Johnson	0.6	\$1,150	\$690	call w/ J Mastin re depo scheduling and prep, scope of testimony	Experts (Including Retention)
10/21/2021	Mark Johnson	0.3	\$1,150	\$345	draft email to expert finder rep re call, issues, information for conflicts check on expert re corporate unity of interests	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/21/2021	Mark Johnson	0.4	\$1,150	\$460	call w GBW re strategy on oppositon to MTC unprotected mod files, D's intent	Other Motions
10/21/2021	Rachel Steyer	0.5	\$750	\$375	call with TRB to discuss outreach status and project	Class Outreach and Contact
10/21/2021	Rachel Steyer	0.3	\$750	\$225	preparing and updating next batch of signed authorizations and cover letter for MTJ to send to opposing counsel	Communications With Opposing Counsel
10/21/2021	Rachel Steyer	5.9	\$750	\$4,425	ongoing work on updating supplemental initial disclosures, reviewing relativity for various categories of documents, reviewing earlier RFPs, updating draft	Discovery (Non-Deposition)
10/21/2021	Travis Close	0.2	\$850	\$170	Email to RAB re: calculation of size and quantity of august 25th production needed	Case Organization, Planning and Strategy
10/21/2021	Travis Close	0.5	\$850	\$425	Analyze online recrords for 5711 N. Reseda Ave, Los Angeles available from City's online database for evidence of new construction	Class Certification
10/21/2021	Travis Close	0.9	\$850	\$765	Analyze supplemental questions for created for Kailes by GBW (depo prep)	Depositions
10/21/2021	Travis Close	0.9	\$850	\$765	Analyze North Tarzana building records produced for evidence of date of new construction	Discovery (Non-Deposition)
10/21/2021	Travis Close	0.6	\$850	\$510	Review and analyze certificates of occupancy/Building department permits produced by EPO for Bakersfield, north tarzana, whittier, san marcos, Magnolia facilities	Discovery (Non-Deposition)
10/21/2021	Travis Close	0.4	\$850	\$340	Analyze updated spreadsheet of building records by EPO to determine further discovery/requests necessary	Discovery (Non-Deposition)
10/21/2021	Travis Close	0.5	\$850	\$425	Review and analyze records produced by City of Corona for Brookdale magnolia (check certificate of occupancy and application for building permit)	Discovery (Non-Deposition)
10/21/2021	Travis Close	1.2	\$850	\$1,020	Draft PRA request for Los Angeles, including facilities of North Tarzana, South Tarzana, Chatsworth	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/21/2021	Travis Close	0.2	\$850	\$170	Call to city of san pablo re: how to request building records	Discovery (Non-Deposition)
10/21/2021	Travis Close	1.3	\$850	\$1,105	Draft PRA request for City of San Pablo and send to appropriate custodian	Discovery (Non-Deposition)
10/21/2021	Travis Close	0.2	\$850	\$170	Email to LA dept of building and safety re: PRA request for northridge, south and north tarzana facilities	Discovery (Non-Deposition)
10/21/2021	Travis Close	0.9	\$850	\$765	Extract North Tarzana building records from larger Los Angeles production; optimize and send to expert	Experts (Including Retention)
10/22/2021	Guy Wallace	0.3	\$1,350	\$405	com's with Kennedy; DTM re depo schedule	Depositions
10/22/2021	Guy Wallace	0.8	\$1,350	\$1,080	com's with CJH; BU; MTJ; RAB re Aegis task times, and whether they are confidential w/r/t use in Brookdale litigation	Misc. Research
10/22/2021	Guy Wallace	2.4	\$1,350	\$3,240	preparation and drafting of opposition section re D's MTC re unprotected .mod files	Other Motions
10/22/2021	Guy Wallace	1.1	\$1,350	\$1,485	revise and edit opposition to MTC re unprotected files; com's with DTM; MTJ re same	Other Motions
10/22/2021	Mark Johnson	0.5	\$1,150	\$575	calls w/ GBW re availabilit of task times from other case for use in staffing anaylsis. research docket in other case for same; email gbw re results of reseach, extract and ssend doc.	Other Motions
10/22/2021	Travis Close	0.2	\$850	\$170	Review and analyze Stip on schedule for motion for class cert and order	Class Certification
10/22/2021	Travis Close	0.4	\$850	\$340	Email to EPO re: analysis of docs needed by architectural experts and instructions for assignment	Discovery (Non-Deposition)
10/22/2021	Travis Close	0.5	\$850	\$425	Review and analyze final drafts of responses to ROGs from Stiner, Lindstrom, and Jestrabek-Hart	Discovery (Non-Deposition)
10/22/2021	Travis Close	0.3	\$850	\$255	Review and analyze defendants' modified joint letter brief re: MOD files from plaintiffs' experts	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/22/2021	Travis Close	1.5	\$850	\$1,275	Legal research re: to what extent are experts required to produce underlying files used in analysis	Discovery (Non-Deposition)
10/22/2021	Travis Close	1.1	\$850	\$935	Legal research re: to what extent are opposing parties allowed to test an experts' methodology.	Discovery (Non-Deposition)
10/22/2021	Travis Close	1.2	\$850	\$1,020	Analyze extent to which City of Los Angeles produced responsive records for Northridge, South and North Tarzana, and Chatsworth facilities	Discovery (Non-Deposition)
10/22/2021	Travis Close	0.9	\$850	\$765	Gather documents requested by architectural expert (JM) for validation of construction dates of brookdale facilities	Discovery (Non-Deposition)
10/22/2021	Travis Close	0.2	\$850	\$170	Email to MTJ re: collecting building records for expert	Experts (Including Retention)
10/22/2021	Travis Close	1.3	\$850	\$1,105	Draft new PRA request for City of Corona based on insufficiency of docs produced in prior request	Experts (Including Retention)
10/23/2021	Guy Wallace	0.9	\$1,350	\$1,215	legal research and analysis re D's obstructionist litigation conduct and responsibility for fees arising therefrom	Misc. Research
10/23/2021	Guy Wallace	1.3	\$1,350	\$1,755	review and analysis of D's revisions to letter re .mod files; legal research and analysis re same; revise and edit same; com's with DTM; MTJ re same	Other Motions
10/25/2021	Guy Wallace	1.5	\$1,350	\$2,025	preparation of further tasks to be performed in preparation for class certification and remaining merits discovery	Case Organization, Planning and Strategy
10/25/2021	Guy Wallace	0.4	\$1,350	\$540	com's with Maatman; MTJ re deposition schedule re experts and Plaintiffs	Depositions
10/25/2021	Guy Wallace	0.4	\$1,350	\$540	preparation of potential topics and questions re Cross deposition. com's with MTJ re same (.1)	Depositions
10/25/2021	Guy Wallace	1.3	\$1,350	\$1,755	review and analysis of DTM proposed edits to further draft of MTC re .mod files; com's with DTM; MTJ; and Maatman re same	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/25/2021	Guy Wallace	0.2	\$1,350	\$270	review and analysis of order from MJ Beeler re MTC re agreements; com's with MTJ re same	Other Motions
10/25/2021	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW re depo scheduling and prep, experts, joint ltr brief on .mod files, analysis for Kailes depo	Case Organization, Planning and Strategy
10/25/2021	Mark Johnson	0.3	\$1,150	\$345	call w/ Mastin re depo scheduling	Depositions
10/25/2021	Mark Johnson	0.3	\$1,150	\$345	com w/ Justin P and TCC re analysis of local facilities emergency plans for assistance with Kailes depo prep	Depositions
10/25/2021	Mark Johnson	0.1	\$1,150	\$115	call w/ D Marks re Schroyer depo scheduling	Depositions
10/25/2021	Mark Johnson	0.3	\$1,150	\$345	call w/ AP Expert rep re expert on unity of interest	Experts (Including Retention)
10/25/2021	Rachel Steyer	0.3	\$750	\$225	preparing final batch of declarant authorizations for MTJ to send to opposing counsel requesting documents	Communications With Opposing Counsel
10/25/2021	Rachel Steyer	6.6	\$750	\$4,950	continuing to review and update/add to draft of supplemental intial disclosures	Discovery (Non-Deposition)
10/25/2021	Travis Close	0.8	\$850	\$680	Analyze history of emergency and disaster forms & changes by Cal DSS (Kailes depo prep)	Depositions
10/25/2021	Travis Close	0.5	\$850	\$425	Compile record of depo exhibits on topic of emergency evacuation introduced thus far	Depositions
10/25/2021	Travis Close	0.4	\$850	\$340	Review and analyze court's order on discovery; refer back to previous ECF filings re: discovery disputes	Discovery (Non-Deposition)
10/25/2021	Travis Close	0.7	\$850	\$595	Analyze production of documents for Walnut facility (19850 E Colima) received by City of Los Angeles Public Works	Discovery (Non-Deposition)
10/25/2021	Travis Close	1.0	\$850	\$850	Emails (various) to architectural experts re: documents recieved evidencing date of construction for Brookdale facilities	Discovery (Non-Deposition)
10/25/2021	Travis Close	0.3	\$850	\$255	Email to JMP, MTJ, RAB re: meeting to discuss emergency evacuation plan assignment	Discovery (Non-Deposition)
10/25/2021	Travis Close	0.5	\$850	\$425	meeting w/ JMP, MTJ, RAB re: supp. emergency evacuation plan assignment (Depo prep)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/25/2021	Travis Close	0.8	\$850	\$680	Review and analyze certificates of occupancy and building permit applications retrieved for alhambra, bakersfield, brea, anaheim, and gardens of tarzana facilities	Discovery (Non-Deposition)
10/25/2021	Travis Close	0.2	\$850	\$170	Email to LA DPW re: building records received for 19250 E. Colima facility	Discovery (Non-Deposition)
10/25/2021	Travis Close	0.4	\$850	\$340	Analyze latest production of call pendant data received	Discovery (Non-Deposition)
10/25/2021	Travis Close	0.4	\$850	\$340	Email to JMP re: detailed instructions for emergency evacuation assignment (Kailes depo prep)	Experts (Including Retention)
10/25/2021	Travis Close	0.3	\$850	\$255	Email to MTJ re: today's call with June Kailes and depo prep	Experts (Including Retention)
10/25/2021	Travis Close	1.3	\$850	\$1,105	Analyze supplemental emergency evacuation plans for evidence of resident participation in drills	Experts (Including Retention)
10/26/2021	Guy Wallace	0.6	\$1,350	\$810	com's with JY; AX; MTJ re depo scheduling and depo preparation	Depositions
10/26/2021	Guy Wallace	0.5	\$1,350	\$675	review and analysis of Cross declaration; preparation of questions re same; com's with MTJ re initial depo prep	Depositions
10/26/2021	Guy Wallace	0.2	\$1,350	\$270	com's with Kennedy; Waters re expert depo schedule	Depositions
10/26/2021	Guy Wallace	0.5	\$1,350	\$675	com's with RLS re projects re declarations; supplementation of initial disclosures and areas of supplementation; preparation for Waters depo	Discovery (Non-Deposition)
10/26/2021	Guy Wallace	1.5	\$1,350	\$2,025	review and analysis of Aegis task times (Flores exhibit); Aegis protective order; legal research and analysis re documents left in the public domain; com's with MTJ re strategy re same	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/26/2021	Mark Johnson	0.7	\$1,150	\$805	call w/ GBW re depo scheduling, use of task time information for another AL chain and availability of same in public records, assignments for TCC and RLS	Case Organization, Planning and Strategy
10/26/2021	Mark Johnson	2.5	\$1,150	\$2,875	depo prep session w/ Doug Cross	Depositions
10/26/2021	Mark Johnson	1.3	\$1,150	\$1,495	review declaration and Cross materials, docs considered for depo prep session w/ Doug Cross	Depositions
10/26/2021	Mark Johnson	0.3	\$1,150	\$345	team call re Plaintiff depo scheduling and communication w/ OC re same	Depositions
10/26/2021	Mark Johnson	0.8	\$1,150	\$920	draft email to OC re failure to confirm non-expert depositions and response to demand for earlier dates for 3 Plaintiff depositions, review prior communications re same	Depositions
10/26/2021	Mark Johnson	0.2	\$1,150	\$230	email exchanges w/ COC re communication w/ OC re depo scheduling of non-expert witnesses.	Depositions
10/26/2021	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW re position on scheduling of Plaintiff depositions; possible rationale for Ds demand for earlier dates, potential motions based on deposition testimony	Depositions
10/26/2021	Mark Johnson	1.0	\$1,150	\$1,150	review docket in related case for availability of task time information in ECF filings and pleadings related to confidentiality and redaction of same.	Misc. Research
10/26/2021	Mark Johnson	0.2	\$1,150	\$230	com w/ COC JY re availability of task time information for other AL facility in public records of related case.	Misc. Research
10/26/2021	Rachel Steyer	0.7	\$750	\$525	call with GBW to discuss assignments and outreach efforts	Class Outreach and Contact
10/26/2021	Rachel Steyer	0.6	\$750	\$450	editing and reviewing outreach script and declaration template, sending to GBW for further review	Class Outreach and Contact
10/26/2021	Rachel Steyer	0.2	\$750	\$150	call with family member, scheduled intake call	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/26/2021	Rachel Steyer	0.3	\$750	\$225	call with family member of resident, took contact info, wanted to think about it for a few days before further communication	Class Outreach and Contact
10/26/2021	Rachel Steyer	0.3	\$750	\$225	gathering declarations for MTJ to review with expert in depo prep	Depositions
10/26/2021	Rachel Steyer	0.3	\$750	\$225	zoom with co-counsel to discuss finalizing dates with opposing counsel for named plaintiff depositions	Depositions
10/26/2021	Travis Close	0.4	\$850	\$340	Meeting with team re: scheduling plaintiffs' depositions	Depositions
10/26/2021	Travis Close	0.5	\$850	\$425	Review and analyze recent DSS facility evaluation reports and complaint investigation reports for Auburn, Nohl Ranch, Irvine, and Chatsworth, Sylvan ranch facilities	Discovery (Non-Deposition)
10/26/2021	Travis Close	0.2	\$850	\$170	Email to RAB, EPO re: producing next batch of building records to defendants	Discovery (Non-Deposition)
10/26/2021	Travis Close	0.7	\$850	\$595	Analyze index of records produced by City of LA for 5711 Reseda, 18700 Burbank, and 17650 Devonshire st facilities	Discovery (Non-Deposition)
10/26/2021	Travis Close	0.4	\$850	\$340	Review and analyze production by city of San Pablo in response to request for building records	Discovery (Non-Deposition)
10/26/2021	Travis Close	0.5	\$850	\$425	LA building records system -- tutorial for accessing files	Discovery (Non-Deposition)
10/26/2021	Travis Close	1.5	\$850	\$1,275	Analyze/investigate backgrounds of potential experts on corporations -- William H. Purcell	Experts (Including Retention)
10/26/2021	Travis Close	1.6	\$850	\$1,360	Analyze/investigate backgrounds of potential experts on corporations -- Reynaldo Anaya Valencia	Experts (Including Retention)
10/26/2021	Travis Close	0.5	\$850	\$425	Review and analyze dec of Doug Cross for major opinions & potential issues in prep for depo prep session	Experts (Including Retention)
10/26/2021	Travis Close	2.9	\$850	\$2,465	Meet with Doug Cross, MTJ in office for first depo prep session	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/27/2021	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ; TCC re preparation for Cross depo	Depositions
10/27/2021	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of Cross declaration; preparation of potential questions re deposition	Depositions
10/27/2021	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re analysis of depo testimony from Bowman, other corporate officials; MTC re resident files and RFPs re files of named P's; analysis of issues that require further discovery	Discovery (Non-Deposition)
10/27/2021	Mark Johnson	1.0	\$1,150	\$1,150	call w/ GBW re case planning generally, including additonal targeted document review, possible dispositive motions by Ds, evidence re ownership/operation issue, use of task time data from other case, additional discovery to be propunded, including Plaintiff files.	Case Organization, Planning and Strategy
10/27/2021	Mark Johnson	2.3	\$1,150	\$2,645	review depo transcripts for testimony on transporation policy, isolate and highlight same; draft emails to expert re same and re declarations	Depositions
10/27/2021	Mark Johnson	0.6	\$1,150	\$690	call w/ GBW re OC response on P depo schedule; consequences of same and depo prep	Depositions
10/27/2021	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW re depo prep for Doug Cross, local transportation polices, anticipated Qs on reasonable accommodations.	Depositions
10/27/2021	Mark Johnson	1.5	\$1,150	\$1,725	draft emails to OC re demand for class list for remaining residents; demand for local transportation policies based on Bowman testimony; research prior communications and depo testimony re same.	Discovery (Non-Deposition)
10/27/2021	Mark Johnson	0.5	\$1,150	\$575	draft email to OC following up on court order re meeting and conferring on burden of producing ownership/operation agreements, listing information they should provide as part of the process	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/27/2021	Mark Johnson	0.3	\$1,150	\$345	email to GBW describing procedural history of effort to obtain transportation policies and filings and orders re same.	Discovery (Non-Deposition)
10/27/2021	Rachel Steyer	0.2	\$750	\$150	call with family member, provided contact info and discussed case	Class Outreach and Contact
10/27/2021	Rachel Steyer	0.2	\$750	\$150	call w/family member, discussed case, scheduled intake call	Class Outreach and Contact
10/27/2021	Rachel Steyer	0.4	\$750	\$300	call with family member of resident, discussed case, mother resided at Brookdale prior to class period	Class Outreach and Contact
10/27/2021	Rachel Steyer	0.4	\$750	\$300	spoke with daughter in law of former resident, after discussing case, issues were too individualized	Class Outreach and Contact
10/27/2021	Travis Close	0.2	\$850	\$170	Email to GBW re: defendants' completion of production for transportation policies	Case Organization, Planning and Strategy
10/27/2021	Travis Close	0.2	\$850	\$170	Email to Don Singleton re: expert testimony from Douglas Cross in prior case	Case Organization, Planning and Strategy
10/27/2021	Travis Close	1.1	\$850	\$935	Analyze prior communications from defendants to determine when Defendants completed production of transportation documents	Depositions
10/27/2021	Travis Close	0.4	\$850	\$340	call to singleton law firm LLC re: request for trial transcripts and depo transcripts of doug cross (Depo prep)	Depositions
10/27/2021	Travis Close	1.7	\$850	\$1,445	Research prior deposition testimony by Douglas Cross in Sunday Parker vs. MV Public Transportation, et al. and) Jaccolah Johnson vs. Metropolitan Atlanta Rapid Transit Authority, et al. (depo prep)	Depositions
10/27/2021	Travis Close	0.2	\$850	\$170	Download, organize and print prior litigation materials by cross in Alameda Cty superior court case (Cross depo prep)	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/27/2021	Travis Close	0.5	\$850	\$425	Review and analyze Brookdale's policy for reasonable accommodation/modification requests re: accessible transportation; compare to Title II regs (Cross depo prep)	Depositions
10/27/2021	Travis Close	1.1	\$850	\$935	Analyze Cross's publication on Mobility Device Access & Securement for potential inconsistencies with opinions in Declaration	Depositions
10/27/2021	Travis Close	0.6	\$850	\$510	Review and analyze JMP's analysis of supplemental emergency and disaster plans for sufficiency and accuracy	Discovery (Non-Deposition)
10/27/2021	Travis Close	0.5	\$850	\$425	Analyze extent of trial testimony of Douglas Cross in Parker v. MV Public Transportation Inc.	Discovery (Non-Deposition)
10/27/2021	Travis Close	0.2	\$850	\$170	Call back from don singleton re: douglas cross materials	Experts (Including Retention)
10/28/2021	Guy Wallace	1.5	\$1,350	\$2,025	preparation of potential topics and questions re Cross depo; com's with MTJ re same	Depositions
10/28/2021	Guy Wallace	0.8	\$1,350	\$1,080	com's with BBK; JY; AX; MTJ re depo schedule for plaintiffs and preparation re same	Depositions
10/28/2021	Mark Johnson	3.7	\$1,150	\$4,255	depo prep session w/ D Cross, TCC	Depositions
10/28/2021	Mark Johnson	1.3	\$1,150	\$1,495	review potential Qs from GBW for Cross depo prep; review other materials and prepare notes for session	Depositions
10/28/2021	Mark Johnson	0.4	\$1,150	\$460	conference call w/ GBW, RBGG attorneys, K Stilber and BU re Plaintiff depo scheduling and prep	Depositions
10/28/2021	Mark Johnson	0.3	\$1,150	\$345	calls w/ GBW re depo prep for Cross and scheduling of plaintiff depositions	Depositions
10/28/2021	Mark Johnson	0.8	\$1,150	\$920	draft email to OC re prior meet and confer on declarant / resident files and current position, invitation to meet and confer; review notes and prior communications for same	Discovery (Non-Deposition)
10/28/2021	Mark Johnson	1.7	\$1,150	\$1,955	continue drafting and finalize document request set 6,	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/28/2021	Rachel Steyer	0.4	\$750	\$300	conducted partial outreach, determined to continue call for a few months later following move	Class Outreach and Contact
10/28/2021	Rachel Steyer	0.3	\$750	\$225	call with family member of former resident, decided not a good fit for intake/declaration	Class Outreach and Contact
10/28/2021	Rachel Steyer	0.2	\$750	\$150	phone call with family member, decided not a good fit for intake/declaration given brevity of stay	Class Outreach and Contact
10/28/2021	Rachel Steyer	0.2	\$750	\$150	phone call with family member, discussed case, gave her contact info, wanted to speak with her husband first	Class Outreach and Contact
10/28/2021	Rachel Steyer	0.4	\$750	\$300	spoke with daughter of former resident, had some issues with understaffing but wasn't interested in completing intake or participating further	Class Outreach and Contact
10/28/2021	Rachel Steyer	0.3	\$750	\$225	spoke with family member, discussed case, provided contact info, she will follow up with her sister and call back	Class Outreach and Contact
10/28/2021	Rachel Steyer	0.3	\$750	\$225	call with daughter of former resident, discussed case, scheduled intake call for next week	Class Outreach and Contact
10/28/2021	Rachel Steyer	1.6	\$750	\$1,200	completed intake call with daughter of former resident, created client folder, updated sharepoint	Class Outreach and Contact
10/28/2021	Rachel Steyer	0.2	\$750	\$150	drafting/preparing outline for letter brief concerning production of class list	Discovery (Non-Deposition)
10/28/2021	Travis Close	0.6	\$850	\$510	Analyze communications from prior defense counsel for evidence of completion of production of transportation policies	Communications With Opposing Counsel
10/28/2021	Travis Close	0.5	\$850	\$425	Email to MTJ, GBW re: analysis of parties' efforts re production of accessible transportation documents (Cross depo prep)	Depositions
10/28/2021	Travis Close	0.3	\$850	\$255	Review and analyze questions by GBW for Cross depo prep	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/28/2021	Travis Close	0.8	\$850	\$680	Legal research re: scope of "demand responsive system" (Cross Depo prep)	Depositions
10/28/2021	Travis Close	0.5	\$850	\$425	Legal research re: who qualifies as an "operator" of a demand responsive system (Cross depo prep)	Depositions
10/28/2021	Travis Close	0.5	\$850	\$425	Review and analyze deposition transcript of Cross in Johnson v. Metro Atlantca case (Cross depo prep)	Depositions
10/28/2021	Travis Close	0.4	\$850	\$340	Review and analyze prior Cross testimony in Parker v. MV Public Transportation, Inc. (Cross depo prep)	Depositions
10/28/2021	Travis Close	1.9	\$850	\$1,615	Analyze prior correspondance between Ps and Ds; joint discovery letters, and CMCs for discussion of production of accessible transportation documents (Cross depo prep)	Discovery (Non-Deposition)
10/28/2021	Travis Close	0.3	\$850	\$255	Review and analyze court's decision finding that ADA applies to assisted living facilities	Discovery (Non-Deposition)
10/28/2021	Travis Close	3.5	\$850	\$2,975	Depo prep session with Douglas Cross -- Part II	Experts (Including Retention)
10/29/2021	Guy Wallace	5.5	\$1,350	\$7,425	preparation of overall strategy and task list in preparation for D's opposition to the motion for class certification and to prepare for P's reply papers in support thereof	Case Organization, Planning and Strategy
10/29/2021	Mark Johnson	5.3	\$1,150	\$6,095	Defend deposition of expert Dougas Cross	Depositions
10/29/2021	Mark Johnson	1.4	\$1,150	\$1,610	prepare and set-up for Cross depo, including meeting before start, review of docs and tech setup	Depositions
10/29/2021	Mark Johnson	0.3	\$1,150	\$345	email exchange w/ COC re meet and confer; talk to TCC about prep for same, review of ownership chart and list of subsidiaries	Discovery (Non-Deposition)
10/29/2021	Mark Johnson	0.1	\$1,150	\$115	email exchanes w/ OC re scope of meet and cnfer session and scheduling	Discovery (Non-Deposition)
10/29/2021	Rachel Steyer	0.2	\$750	\$150	spoke w/family member of former resident, discussed case, determined not a good fit for intake/declaration	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/29/2021	Rachel Steyer	0.4	\$750	\$300	received call back from family member, scheduled intake call	Class Outreach and Contact
10/29/2021	Rachel Steyer	0.6	\$750	\$450	spoke w/family member of former resident, discussed case, determined not a good fit for intake or declaration	Class Outreach and Contact
10/29/2021	Rachel Steyer	0.5	\$750	\$375	phone call with former resident family member, discussed case and scheduled follow up call	Class Outreach and Contact
10/29/2021	Rachel Steyer	0.3	\$750	\$225	received call back from family member, scheduled intake call for next week	Class Outreach and Contact
10/29/2021	Rachel Steyer	0.3	\$750	\$225	spoke with former resident, scheduled intake call for next week	Class Outreach and Contact
10/29/2021	Rachel Steyer	0.2	\$750	\$150	spoke w/family member, said he wanted to speak with his wife first, scheduled F/U call	Class Outreach and Contact
10/29/2021	Rachel Steyer	0.2	\$750	\$150	call with son of former resident, requested email to review calendar for follow up call	Class Outreach and Contact
10/29/2021	Travis Close	0.2	\$850	\$170	Email to MTJ re: spreadsheet showing owned, leased, managed facilities	Case Organization, Planning and Strategy
10/29/2021	Travis Close	0.9	\$850	\$765	Analysis of trial transcripts in Johnson v. Metropolitan Atlanta for evidence of inconsistencies in trial testimony with declaration (Cross Depo prep)	Depositions
10/29/2021	Travis Close	0.5	\$850	\$425	Analyze records collected on training of employees per transportation policies (Cross depo prep)	Depositions
10/29/2021	Travis Close	0.6	\$850	\$510	Review and analyze all local policies on transportation produced by Defendants (Cross depo prep)	Depositions
10/29/2021	Travis Close	0.6	\$850	\$510	Final review and preparation before Douglas Cross deposition	Depositions
10/29/2021	Travis Close	5.3	\$850	\$4,505	Deposition of Douglas Cross (11:00-4:15)	Depositions
11/1/2021	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re deposition schedule, including depositions of Kennedy and Kailes and preparation re same	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/1/2021	Guy Wallace	0.7	\$1,350	\$945	legal research and analysis re corporate alter ego liability and piercing the corporate veil and recent case law re same; issue of the liability of Brookdale Senior Living, Inc. for conduct that Defendants claim was undertaken by subsidiaries	Misc. Research
11/1/2021	Guy Wallace	0.6	\$1,350	\$810	review and analysis of order from MJ Beeler re .mod files; com's with Maatman; DTM; MTJ re same	Other Motions
11/1/2021	Mark Johnson	0.2	\$1,150	\$230	review GBW case task list	Case Organization, Planning and Strategy
11/1/2021	Mark Johnson	0.6	\$1,150	\$690	call w/ GBW re meet and confer on agreements, follow up for same, other discovery issues; briefing on Cross depo and planning/prep for Kailes depo	Case Organization, Planning and Strategy
11/1/2021	Mark Johnson	0.4	\$1,150	\$460	follow up calls (x2) w/ GBW re Kailes depo and additional work, depositions and task list	Case Organization, Planning and Strategy
11/1/2021	Mark Johnson	0.7	\$1,150	\$805	review prior emails and prepare revised depo schedule, com w/ GBW re same	Depositions
11/1/2021	Mark Johnson	0.1	\$1,150	\$115	email to OC re remaining expert depo dates.	Depositions
11/1/2021	Mark Johnson	0.7	\$1,150	\$805	meet and confer w/ OC Jacobsen and Riley re agreements	Discovery (Non-Deposition)
11/1/2021	Mark Johnson	0.5	\$1,150	\$575	prep for meet and confer session on agreement, reviewing ownership charts and emails	Discovery (Non-Deposition)
11/1/2021	Mark Johnson	0.1	\$1,150	\$115	email to RAB, TCC re document search necessary for local transportation policies.	Discovery (Non-Deposition)
11/1/2021	Mark Johnson	1.0	\$1,150	\$1,150	draft email correspondence to OC memorialilzing meet and confer ssession and requesting D section of letter	Discovery (Non-Deposition)
11/1/2021	Mark Johnson	0.3	\$1,150	\$345	review order from court re .mod files; call w/ GBW re same and email exchange w/ COC re order and production	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/1/2021	Mark Johnson	1.7	\$1,150	\$1,955	review cvs for two potential experts on piercing the corporate veil, research same.	Experts (Including Retention)
11/1/2021	Mark Johnson	0.1	\$1,150	\$115	email exchange w/ AP expert group rep re potential experts	Experts (Including Retention)
11/1/2021	Rachel Steyer	0.3	\$750	\$225	received call back from family member, discussed case, requested more info	Class Outreach and Contact
11/1/2021	Rachel Steyer	0.4	\$750	\$300	spoke w/daughter of former resident, discussed case, wanted to think about it	Class Outreach and Contact
11/1/2021	Rachel Steyer	0.2	\$750	\$150	call with family member of former resident, wanted to think about it, scheduled follow up call	Class Outreach and Contact
11/1/2021	Rachel Steyer	0.5	\$750	\$375	spoke w/family member, discussed case, determined not a good fit for intake/declartaion	Class Outreach and Contact
11/1/2021	Rachel Steyer	0.3	\$750	\$225	spoke with family member, scheduled intake call	Class Outreach and Contact
11/1/2021	Rachel Steyer	0.3	\$750	\$225	call with family member, wanted to discuss with his wife, scheduled follow up call	Class Outreach and Contact
11/1/2021	Rachel Steyer	0.2	\$750	\$150	received call back from friend of former resident, not a good candidate for intake/declaration	Class Outreach and Contact
11/1/2021	Rachel Steyer	0.2	\$750	\$150	spoke with widow of RP and former resident, not familiar with care	Class Outreach and Contact
11/1/2021	Travis Close	0.4	\$850	\$340	Review and analyze memo re: ownership of facilities in prep for today's meet and confer re: same	Case Organization, Planning and Strategy
11/1/2021	Travis Close	0.4	\$850	\$340	Review and analyze the parties' joint letter brief re: Medmodel software and the court's order re same	Case Organization, Planning and Strategy
11/1/2021	Travis Close	0.4	\$850	\$340	Email to MTJ re: summarizing today's M/C call with defendants	Case Organization, Planning and Strategy
11/1/2021	Travis Close	0.8	\$850	\$680	Analyze emails discussing Sonoma Fires (2019) for info re: deficiencies in emergency evacuation plans, policies, and procedures	Case Organization, Planning and Strategy
11/1/2021	Travis Close	0.2	\$850	\$170	Email to EPO re: assistance needed with identifying local facility transportation policies	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/1/2021	Travis Close	0.6	\$850	\$510	Analyze corporate policies re: transportation as to whether facilities have discretion to develop individual policies	Case Organization, Planning and Strategy
11/1/2021	Travis Close	0.8	\$850	\$680	Call with defendants, MTJ re: production of agreements showing interest in facilities or relationship to owner	Communications With Opposing Counsel
11/1/2021	Travis Close	0.3	\$850	\$255	Review and analyze draft response by MTJ to Defendants re: followup on today's M/C call	Communications With Opposing Counsel
11/1/2021	Travis Close	0.5	\$850	\$425	Review and analyze hot Transportation documents found for examples of local policies	Discovery (Non-Deposition)
11/1/2021	Travis Close	1.5	\$850	\$1,275	Review and analyze resident council meetings from Yorba Linda (2019-2020) to identify issues re: accessible transportation and emergency evaluation	Discovery (Non-Deposition)
11/1/2021	Travis Close	0.8	\$850	\$680	Review and analyze resident council meetings from Yorba Linda (2018) to identify issues re: accessible transportation and emergency evaluation	Discovery (Non-Deposition)
11/1/2021	Travis Close	0.7	\$850	\$595	Analyze corporate policies re: emergency evacuation as to whether facilities have discretion to develop individual policies	Discovery (Non-Deposition)
11/1/2021	Travis Close	0.8	\$850	\$680	Review and analyze Gap analysis of disaster plans by JIK; compare to supplemental emergency evac analysis completed by JMP	Experts (Including Retention)
11/2/2021	Guy Wallace	1.4	\$1,350	\$1,890	revise and edit questionnaire re intakes for putative class member declarations; com's with MTJ; RLS re same	Class Certification
11/2/2021	Guy Wallace	1.6	\$1,350	\$2,160	revise and edit model class cert reply declaration for putative class members or family members	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/2/2021	Mark Johnson	0.7	\$1,150	\$805	calls w/ GBW (x4) re Kailes depo prep approach, script for class member calls, timing of production of unprotected .mod files, analysis of actual staffing v benchmark and implications, retention of expert on piercing the corporate veil and ownership v operation issue	Case Organization, Planning and Strategy
11/2/2021	Mark Johnson	0.5	\$1,150	\$575	review and edit revised script for class member outreach and com w RLS, GBW re same	Class Outreach and Contact
11/2/2021	Mark Johnson	1.1	\$1,150	\$1,265	call w/ June Kailes, TCC re depo prep and analysis of local plans, her analysis of gap in plans	Depositions
11/2/2021	Mark Johnson	1.4	\$1,150	\$1,610	review expert JK analysis of gap in plans, local plans, declaration for conference call re same and depo prep	Depositions
11/2/2021	Mark Johnson	0.3	\$1,150	\$345	review docs identified by EO as possible transportation plans or info at facility level, review TCC email re same.	Depositions
11/2/2021	Mark Johnson	0.2	\$1,150	\$230	draft email to OC confirming depo dates for experts and status of proposed dates for plaintiffs and non-expert witnesses. review notes and prior correspondence re same	Depositions
11/2/2021	Mark Johnson	0.2	\$1,150	\$230	email exchanges w/ COC Yellin and Bien-Kahn re scheduling Plaintiff depositions and communicating w/ OC re same.	Depositions
11/2/2021	Mark Johnson	0.3	\$1,150	\$345	email exchanges w/ D Marks and J Thornton re process and timing for production of unprotected .mod files	Discovery (Non-Deposition)
11/2/2021	Mark Johnson	0.1	\$1,150	\$115	draft email to OC describing process and timing for production of unprotected .mod files.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/2/2021	Mark Johnson	1.8	\$1,150	\$2,070	review results of new audit of assessment and move-our data and DM summary of same; draft email response recapping prior communications with opposing counsel, new information and changes that need to be made to spreadsheet and summary for communication with opposing counsel; edit spreadsheet accordingly.	Discovery (Non-Deposition)
11/2/2021	Mark Johnson	1.0	\$1,150	\$1,150	draft / revise email to OC re missing data and summarizing prior communications and meet and confer sessions re same and requesting production of all missing data; draft email to COC re same for review and identifying changes.	Discovery (Non-Deposition)
11/2/2021	Mark Johnson	0.3	\$1,150	\$345	com w/ JP re analysis of emergency plans for Kailes depo; terms used in spreadsheet	Experts (Including Retention)
11/2/2021	Rachel Steyer	0.2	\$750	\$150	received call back from family member, discussed case, said to follow up with family's lawyer	Class Outreach and Contact
11/2/2021	Rachel Steyer	0.4	\$750	\$300	follow up call with family member of former resident, scheduled intake call	Class Outreach and Contact
11/2/2021	Rachel Steyer	0.4	\$750	\$300	received call back from family member, discussed case, scheduled follow up call for later in the week	Class Outreach and Contact
11/2/2021	Rachel Steyer	0.2	\$750	\$150	received call back from family member, not a good fit given mother passed away before class period began	Class Outreach and Contact
11/2/2021	Rachel Steyer	2.0	\$750	\$1,500	conducted intake with family member of former resident, created client folder, updated sharepoint	Class Outreach and Contact
11/2/2021	Rachel Steyer	0.3	\$750	\$225	follow up call with family member, scheduled intake call	Class Outreach and Contact
11/2/2021	Rachel Steyer	0.2	\$750	\$150	reviewing documents provided from family member, created client doc folder	Class Outreach and Contact
11/2/2021	Rachel Steyer	1.5	\$750	\$1,125	reviewing third amended complaint, adding and editing sections within revised class outreach intake script	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/2/2021	Rachel Steyer	0.3	\$750	\$225	reviewing likely declarant residency agreement, other documents in production	Discovery (Non-Deposition)
11/2/2021	Travis Close	0.3	\$850	\$255	Meeting with JMP, MTJ re: analysis of supplemental emergency evacuation plans	Case Organization, Planning and Strategy
11/2/2021	Travis Close	0.3	\$850	\$255	Email to EPO re: analysis of supplemental local transportation policies	Case Organization, Planning and Strategy
11/2/2021	Travis Close	0.2	\$850	\$170	Email to MTJ re: modification of supp. emergency evac analysis as discussed during call with expert	Case Organization, Planning and Strategy
11/2/2021	Travis Close	1.3	\$850	\$1,105	Legal research re: government actions that trigger compliance under ADA (building permits/certificates of occupancy	Case Organization, Planning and Strategy
11/2/2021	Travis Close	0.5	\$850	\$425	Legal research re: requiremens for issuing a certificate of occupancy by LA Dept of Building and Safety	Case Organization, Planning and Strategy
11/2/2021	Travis Close	0.6	\$850	\$510	Update status of building records received from City/County jurisdictions pursuant to updated PRA requests	Case Organization, Planning and Strategy
11/2/2021	Travis Close	0.2	\$850	\$170	Review analysis by MTJ re: status of missing assessment data & next steps for production	Case Organization, Planning and Strategy
11/2/2021	Travis Close	0.5	\$850	\$425	Review and analyze documents located by EPO evidencing local transportation policies	Discovery (Non-Deposition)
11/2/2021	Travis Close	1.2	\$850	\$1,020	Review analysis by EPO of status of efforts to collect construction histories from facilities via PRA requests to jurisdictions; which are missing Original Building Permit App and which are missing Certificate of Occupancy	Discovery (Non-Deposition)
11/2/2021	Travis Close	0.8	\$850	\$680	Analyze LA building records database for 18700 Burbank Blvd - search for Certificate of occupancy and original application for building permit	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/2/2021	Travis Close	0.7	\$850	\$595	Analyze LA building records database for 17650 Devonshire St - search for Certificate of occupancy and original application for building permit	Discovery (Non-Deposition)
11/2/2021	Travis Close	0.5	\$850	\$425	Prep for 11:00 meeting with emergency evacuation expert June Kailes (review prior analysis of local supplemental plans by our staff attorneys, fire drills, and her stop--gap analysis)	Experts (Including Retention)
11/2/2021	Travis Close	1.1	\$850	\$935	11:00 meeting with emergency evacuation expert June Kailes, MTJ to discuss analysis of supp. emergency evac plans and her stop-gap analysis	Experts (Including Retention)
11/3/2021	Guy Wallace	0.8	\$1,350	\$1,080	revise and edit overall task list; com's with MTJ re same	Case Organization, Planning and Strategy
11/3/2021	Guy Wallace	1.1	\$1,350	\$1,485	revise and edit the script for class outreach; model class cert reply declaration; com's with RLS; MTJ re same	Class Certification
11/3/2021	Guy Wallace	0.4	\$1,350	\$540	com's with Waters re preparation for deposition; review of construction history chart	Depositions
11/3/2021	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of data and analysis from DTM re extent to which Brookdale facilities are staffed below the benchmarks	Misc. Research
11/3/2021	Mark Johnson	0.5	\$1,150	\$575	call w/ GBW re content of draft overall task list, assignments	Case Organization, Planning and Strategy
11/3/2021	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW re task assignments, discovery issues, meet and confer issues	Case Organization, Planning and Strategy
11/3/2021	Mark Johnson	2.8	\$1,150	\$3,220	revise, add to and reformat task list with assignments and annotations	Case Organization, Planning and Strategy
11/3/2021	Mark Johnson	0.6	\$1,150	\$690	calls w/ R. Stiner (x2) re billing issues and communication with San Ramon ED re same and re Stacy's issues w/ showering and insufficient staff.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/3/2021	Mark Johnson	1.2	\$1,150	\$1,380	review JT email and revised data audit and investigate discrepancies wrt facilities included, draft emails to JT and others re analysis, results of findings and proposal.	Discovery (Non-Deposition)
11/3/2021	Rachel Steyer	0.2	\$750	\$150	editing and reviewing GBW edits to declaration template and intake scripts	Class Certification
11/3/2021	Rachel Steyer	0.3	\$750	\$225	call with TRB to discuss staffing of outreach	Class Outreach and Contact
11/3/2021	Rachel Steyer	1.3	\$750	\$975	call with family member of resident, determined not a good fit for intake or declaration given claims were a bit too individualized	Class Outreach and Contact
11/3/2021	Rachel Steyer	0.3	\$750	\$225	returned missed call, mother was a Brookdale resident for less than a month, not a good fit	Class Outreach and Contact
11/3/2021	Rachel Steyer	0.4	\$750	\$300	received call from family member of current resident, scheduled follow up call when she visits for us to speak with her sister	Class Outreach and Contact
11/3/2021	Rachel Steyer	0.2	\$750	\$150	spoke with family member of former resident, scheduled intake call	Class Outreach and Contact
11/3/2021	Travis Close	0.3	\$850	\$255	Review and analyze Anaheim production for City contact info and missing records	Case Organization, Planning and Strategy
11/3/2021	Travis Close	0.2	\$850	\$170	Email to JY (co-counsel) re: suggestions for improving memo on preparation of plaintiffs for deposition	Case Organization, Planning and Strategy
11/3/2021	Travis Close	0.6	\$850	\$510	Review and analyze memo re topics for plaintiff deposition prep drafted by JY (co-counsel)	Depositions
11/3/2021	Travis Close	0.3	\$850	\$255	Review and analyze emails from David Thornton, david marks, MTJ re: updates on status of missing assessment data	Discovery (Non-Deposition)
11/3/2021	Travis Close	1.1	\$850	\$935	Draft PRA Request to City of Anaheim for original application for building permit and first certificate of occupancy issued	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/3/2021	Travis Close	0.6	\$850	\$510	Review and analyze City of Bakersfield production (Riverwalk and Bakersfield facilities) for contact info and missing records	Discovery (Non-Deposition)
11/3/2021	Travis Close	0.6	\$850	\$510	Review and analyze records produced by City of Westminster for completeness/adequacy in fulfilling PRA request; analyze stated objections to producing documents	Discovery (Non-Deposition)
11/3/2021	Travis Close	0.8	\$850	\$680	Draft PRA Request to City of Bakersfield for original application for building permit and first certificate of occupancy issued (Bakersfield and Riverwalk facilities)	Discovery (Non-Deposition)
11/3/2021	Travis Close	0.3	\$850	\$255	Review and analyze City of Oceanside production (Oceanside) for contact info and missing records	Discovery (Non-Deposition)
11/3/2021	Travis Close	0.8	\$850	\$680	Draft PRA Request to City of Oceanside for original application for building permit and first certificate of occupancy issued (Oceanside facility)	Discovery (Non-Deposition)
11/3/2021	Travis Close	0.7	\$850	\$595	Draft PRA Request to Redwood City for original application for building permit and first certificate of occupancy issued (Redwood city	Discovery (Non-Deposition)
11/3/2021	Travis Close	0.4	\$850	\$340	Review and analyze sample expert report from Mr. Reynaldo Valencia (possible corporations expert)	Experts (Including Retention)
11/4/2021	Guy Wallace	0.5	\$1,350	\$675	revise and edit draft of task list; com's with co-counsel re same	Case Organization, Planning and Strategy
11/4/2021	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ re RFPs re agreements between BSL, Inc. and subsidiaries and scope of discovery and potential burden re same	Discovery (Non-Deposition)
11/4/2021	Guy Wallace	0.5	\$1,350	\$675	review and analysis of current draft of construction history chart	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/4/2021	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ re D's subpoenas to Flores; Schroyer and com's with Maatman re same	Discovery (Non-Deposition)
11/4/2021	Guy Wallace	1.1	\$1,350	\$1,485	com's with Waters; Mastin; MTJ; TCC re construction history and documentation re applications for building permits and certificates of occupancy	Experts (Including Retention)
11/4/2021	Mark Johnson	0.7	\$1,150	\$805	call w/ TCC and GBW re facility construction histories, document acquisition and strategy for gatehring, presenting same and coms w/ access experts	Case Organization, Planning and Strategy
11/4/2021	Mark Johnson	0.7	\$1,150	\$805	call w/ GBW re strategy for responding to subpoena served on Schroyer and Flores and gathering responsive documents	Discovery (Non-Deposition)
11/4/2021	Mark Johnson	0.5	\$1,150	\$575	review client draft ltr to San Ramon ED and advise re same; follow up coms re depo scheduling and strategy for call w/ ED	Discovery (Non-Deposition)
11/4/2021	Rachel Steyer	2.6	\$750	\$1,950	conducted intake with family member, created client folder, updated sharepoint	Class Outreach and Contact
11/4/2021	Rachel Steyer	0.4	\$750	\$300	conducted partial intake with former resident, determined not a good fit	Class Outreach and Contact
11/4/2021	Rachel Steyer	0.2	\$750	\$150	called family member back, scheduled intake	Class Outreach and Contact
11/4/2021	Rachel Steyer	0.4	\$750	\$300	spoke w/family member, discussed case, scheduled intake	Class Outreach and Contact
11/4/2021	Rachel Steyer	0.3	\$750	\$225	reviewing emails forwarded from possible intake person, evaluating as ot whether worthwhile to pursue intake	Class Outreach and Contact
11/4/2021	Rachel Steyer	0.3	\$750	\$225	editing and updating outreach script to include additional GBW access questions	Class Outreach and Contact
11/4/2021	Rachel Steyer	0.3	\$750	\$225	call with TCC to discuss assisting with public records request project	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/4/2021	Rachel Steyer	0.2	\$750	\$150	reviewing and organizing documents and files provided by likely declarant	Discovery (Non-Deposition)
11/4/2021	Rachel Steyer	1.8	\$750	\$1,350	preparing and submitting public records requests for facility construction info, updating internal spreadsheet	Discovery (Non-Deposition)
11/4/2021	Travis Close	0.6	\$850	\$510	Analyze updated litigation task list by GBW	Case Organization, Planning and Strategy
11/4/2021	Travis Close	0.2	\$850	\$170	email to GBW re: question about construction history spreadsheet	Case Organization, Planning and Strategy
11/4/2021	Travis Close	0.9	\$850	\$765	Call with GBW, MTJ to discuss construction history evidence and next steps for gathering missing documents	Case Organization, Planning and Strategy
11/4/2021	Travis Close	0.2	\$850	\$170	Email to RLS re: request to meet to discuss PRA assignment	Case Organization, Planning and Strategy
11/4/2021	Travis Close	0.3	\$850	\$255	Call with RLS re: Public Records Act assignment	Case Organization, Planning and Strategy
11/4/2021	Travis Close	0.3	\$850	\$255	Meeting with EPO re: assignment of sending construction related documents to architectural experts	Case Organization, Planning and Strategy
11/4/2021	Travis Close	0.6	\$850	\$510	Analyze production by City of San Diego (for Brookdale Clairemont and Carmel Valley facilities) to determine proper custodian for follow-up & adequacy of original response	Discovery (Non-Deposition)
11/4/2021	Travis Close	0.5	\$850	\$425	Review and analyze additional facility-specific transportation policies located by EPO	Discovery (Non-Deposition)
11/4/2021	Travis Close	0.2	\$850	\$170	Email to EPO re: proposed meeting to discuss construction history assignment	Discovery (Non-Deposition)
11/4/2021	Travis Close	0.2	\$850	\$170	Email to GW (expert) re: expect to receive records of construction histories	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/4/2021	Travis Close	0.5	\$850	\$425	Review and analyze records produced from prior PRA requests on San Diego Portal/database maintained online; check if cetificates of occupancy included for Clairemont and/or Carmel Valley facilities	Discovery (Non-Deposition)
11/4/2021	Travis Close	0.7	\$850	\$595	Draft PRA request to City of San Diego for Clairemont (5219 Clairemont Mesa Blvd) and Carmel Valley (13101 Hartfield Ave) facilities	Discovery (Non-Deposition)
11/4/2021	Travis Close	0.9	\$850	\$765	Draft PRA request to City of LA Building & Safety Department for original application for building permit & first certificate of occupancy at 20801 Devonshire St (Chatsworth facility)	Discovery (Non-Deposition)
11/4/2021	Travis Close	0.4	\$850	\$340	Review and analyze records maintained in online database (LA Dept of Building & safety) for Chatsworth facility to locate evidence of construction history	Discovery (Non-Deposition)
11/4/2021	Travis Close	0.5	\$850	\$425	Analyze second expert report/opinion produced by potential expert for retainer Reynaldo Valencia on issue of corporations	Experts (Including Retention)
11/4/2021	Travis Close	0.4	\$850	\$340	Review and analyze CVs and lists of cases for potential corporations experts D. Bonese and T. Dalhberg	Experts (Including Retention)
11/5/2021	Guy Wallace	0.8	\$1,350	\$1,080	com's with DTM; JT; BU; MTJ re responses to D's subpoenas to Flores and Schroyer	Discovery (Non-Deposition)
11/5/2021	Guy Wallace	0.4	\$1,350	\$540	com's with RLS re draft of supplemental Initial Disclosures and further revisions re same	Discovery (Non-Deposition)
11/5/2021	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re P's discovery re agreements between BSL, Inc. and subsidiaries; operations plans	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/5/2021	Guy Wallace	0.5	\$1,350	\$675	com's with JY; MTJ re further class member contact information; review of prior requests re same; need for discovery re operations plans pursuant to CA regulations	Discovery (Non-Deposition)
11/5/2021	Mark Johnson	1.4	\$1,150	\$1,610	team zoom meeting to discuss task lists, assignments, strategy and latest developments	Case Organization, Planning and Strategy
11/5/2021	Mark Johnson	1.1	\$1,150	\$1,265	calls w/ GBW (x5) re operations plans, task list, response to subpoena of experts, motions to compel further class / witness list, ltr submission re management agreements	Case Organization, Planning and Strategy
11/5/2021	Mark Johnson	0.2	\$1,150	\$230	email exchange w/ RLS re potential declarant	Class Outreach and Contact
11/5/2021	Mark Johnson	0.1	\$1,150	\$115	review and forward depo otices for Schroyer and Flores	Depositions
11/5/2021	Mark Johnson	0.5	\$1,150	\$575	prep for 6 topic meet and confer w/ opposing counsel, including review of prior correspondence and document requests.	Discovery (Non-Deposition)
11/5/2021	Mark Johnson	0.9	\$1,150	\$1,035	meet and confer w/ OC Jacobsen on 6 topics	Discovery (Non-Deposition)
11/5/2021	Mark Johnson	0.5	\$1,150	\$575	draft memo summarizing meet and confer call and results / next steps on six discovery topics; circulate to COC	Discovery (Non-Deposition)
11/5/2021	Mark Johnson	0.2	\$1,150	\$230	review TCC notes of meet an confer call.	Discovery (Non-Deposition)
11/5/2021	Mark Johnson	0.9	\$1,150	\$1,035	zoom mtg w/ GBW, Marks, Thornton, re strategy for responding to expert subpoenas, gathering responsive documents and objectionable items.	Discovery (Non-Deposition)
11/5/2021	Mark Johnson	0.4	\$1,150	\$460	review propose draft ltr from OC re production of agreements for submission to court; revise same, confer w/ GBW and BU re same; send with email to OC; review response and draft further responding email with additional edits to draft ltr.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/5/2021	Mark Johnson	0.1	\$1,150	\$115	call w/ R Stiner re depos, communication w/ ED re billing	Discovery (Non-Deposition)
11/5/2021	Mark Johnson	0.5	\$1,150	\$575	research prior briefing on discovery of class member contacts; draft email to COC JY re same and review comment from GBW	Other Motions
11/5/2021	Rachel Steyer	1.7	\$750	\$1,275	bi-weekly meeting with GBW, TCC, MTJ and co-counsel concerning ongoing tasks and assignments	Case Organization, Planning and Strategy
11/5/2021	Rachel Steyer	0.2	\$750	\$150	quick edits and additions to intake script following team meeting	Class Certification
11/5/2021	Rachel Steyer	0.2	\$750	\$150	received call back from family member, scheduled intake call	Class Outreach and Contact
11/5/2021	Rachel Steyer	0.2	\$750	\$150	response to MTJ and GBW with questions re potential declarant	Class Outreach and Contact
11/5/2021	Rachel Steyer	0.2	\$750	\$150	reviewing email from TCC summarizing meet and confer with opposing counsel	Communications With Opposing Counsel
11/5/2021	Rachel Steyer	0.5	\$750	\$375	reviewing draft depo prep outline circulated by co-counsel	Depositions
11/5/2021	Rachel Steyer	0.2	\$750	\$150	email to LEC outlining task for preparing public record request forms	Discovery (Non-Deposition)
11/5/2021	Rachel Steyer	0.4	\$750	\$300	completing remaining public records requests, updating spreadsheet	Discovery (Non-Deposition)
11/5/2021	Rachel Steyer	2.5	\$750	\$1,875	revising and adding to draft supplemental initial disclosures	Discovery (Non-Deposition)
11/5/2021	Travis Close	0.2	\$850	\$170	Email to EPO re: final construction history docs to be sent at this time to gary waters	Case Organization, Planning and Strategy
11/5/2021	Travis Close	0.6	\$850	\$510	Review and analyze RCFE regulations to check for requirement for call pendant system in facilities	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/5/2021	Travis Close	1.7	\$850	\$1,445	Team meeting with GBW, MTJ, RLS, BMU, and RBGG co-counsel discussing motions to compel; corporate expert; staffing analysis; additional discovery to serve and additional class member declarations	Case Organization, Planning and Strategy
11/5/2021	Travis Close	0.2	\$850	\$170	Email to BMU, AXU re: regulation requiring pendant data in RCFE facilities	Case Organization, Planning and Strategy
11/5/2021	Travis Close	0.3	\$850	\$255	Reivew and analyze parties' stipulation re: contact of putative class members for whether provisions apply equally to defendants	Class Outreach and Contact
11/5/2021	Travis Close	0.9	\$850	\$765	Meet and confer with defendants re: plaintiffs' files, corporate agreements, MOD files, and other ongoing disputes	Communications With Opposing Counsel
11/5/2021	Travis Close	0.1	\$850	\$85	Review and analyze notices of depo for Dale Schroyer and Cristina Flores	Depositions
11/5/2021	Travis Close	0.5	\$850	\$425	Analyze production by City of Whittier (Brookdale Central Whittier and Uptown Whittier facilities) to determine docs necessary for follow-up request for Uptown Whittier	Discovery (Non-Deposition)
11/5/2021	Travis Close	0.8	\$850	\$680	Draft Public Records Act request to City of Whittier for Uptown Whittier (13250 Philadelphia St) facility; send to appropriate custodian	Discovery (Non-Deposition)
11/5/2021	Travis Close	0.3	\$850	\$255	Review and analyze updated outreach and declaration templates by RLS	Discovery (Non-Deposition)
11/5/2021	Travis Close	0.3	\$850	\$255	Review and analyze draft follow-up joint letter brief from Defendants to be presented to judge beeler on Monday & plaintiffs' proposed edits	Discovery (Non-Deposition)
11/5/2021	Travis Close	1.1	\$850	\$935	Review and analyze emails by Michael Johnson describing actions taken on, as well as interpretations of Brookdale's wheelchair transportation policies	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/6/2021	Guy Wallace	0.6	\$1,350	\$810	revise and edit draft of Supplemental Disclosures from RLS	Discovery (Non-Deposition)
11/6/2021	Guy Wallace	0.7	\$1,350	\$945	review and analysis of DSS regulations re RCFE's re plan of operations; resident assessments; staffing	Misc. Research
11/8/2021	Guy Wallace	1.2	\$1,350	\$1,620	prepare for and participate in tc with Waters; Mastin; MTJ; TCC re construction history of Brookdale facilities and preparation of chart analyzing same	Experts (Including Retention)
11/8/2021	Guy Wallace	1.0	\$1,350	\$1,350	legal research re requirements of Government Code sections 4450 et seq., Health and Safety Code sections 17955 et seq.,	Misc. Research
11/8/2021	Guy Wallace	0.7	\$1,350	\$945	legal research and analysis re case law re liability of subsequent owners to address access violations allegedly attributable to former owners	Misc. Research
11/8/2021	Guy Wallace	0.6	\$1,350	\$810	revise and edit draft letter brief re alleged burden of producing subsidiary agreements; com's with MTJ re same	Other Motions
11/8/2021	Guy Wallace	0.4	\$1,350	\$540	review and analysis of D's section of letter brief re "burden" issues and production of B's agreements re corporate subsidiaries	Other Motions
11/8/2021	Guy Wallace	0.9	\$1,350	\$1,215	legal research and analysis re burden of party resisting discovery to make specific objections to RFP's describing the particular burden(s) associated with producing responsive documents	Other Motions
11/8/2021	Mark Johnson	0.6	\$1,150	\$690	calls (x5) w/ GBW re construction history of facilities, case law re successor liability under Unruh/CBC, response to D revisions to follow up letter on managment agreements	Case Organization, Planning and Strategy
11/8/2021	Mark Johnson	0.1	\$1,150	\$115	coms w/ TCC and GBW re docs provided to expert J Kailes	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/8/2021	Mark Johnson	0.1	\$1,150	\$115	coms w/ J Thornton re production of materials subject to Flores subpoena	Discovery (Non-Deposition)
11/8/2021	Mark Johnson	0.9	\$1,150	\$1,035	call w/ Waters, Mastin, GBW and TCC re construction history review and depo prep	Experts (Including Retention)
11/8/2021	Mark Johnson	0.4	\$1,150	\$460	prep for call w/ Waters and Mastin re constrution history, including review of chart re same and materials identifying effective dates of CBC versions	Experts (Including Retention)
11/8/2021	Mark Johnson	0.2	\$1,150	\$230	draft email to D Cross re conirming depo and depo prep dates, review of transcript and additional docs produced by D re enforcement of fleet policy provisions	Experts (Including Retention)
11/8/2021	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re D's draft ltr of follow up re burden on managemenet agreements.	Other Motions
11/8/2021	Mark Johnson	3.5	\$1,150	\$4,025	draft P section of ltr brief statement of position on burden and production of managment agreements	Other Motions
11/8/2021	Mark Johnson	0.3	\$1,150	\$345	review D revisions to their section of follow up letter re burden of producing agreement-related documents and draft responsive edits to P section; draft email cover re same and follow up emails re approval to file and email exchanges w/ LEC re same	Other Motions
11/8/2021	Rachel Steyer	0.4	\$750	\$300	drafting declaration for witness	Class Certification
11/8/2021	Rachel Steyer	1.0	\$750	\$750	preparing chart tracking declarations and corresponding Brookdale facilities, current and former	Class Certification
11/8/2021	Rachel Steyer	0.5	\$750	\$375	email to TRB, RVR, RDR, DSM, AXW, PXM with necessary documents to review before resuming outreach efforts	Class Outreach and Contact
11/8/2021	Rachel Steyer	0.2	\$750	\$150	email to RVR, RDR, DSM, AXW, PXM concerning reminders/tips for outreach efforts	Class Outreach and Contact
11/8/2021	Rachel Steyer	0.2	\$750	\$150	communications on teams with RVR, RNR, DMS, AXW, PXM concerning outreach efforts	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/8/2021	Travis Close	0.2	\$850	\$170	Email to MTJ, GBW re: producing fire drill reports to expert	Case Organization, Planning and Strategy
11/8/2021	Travis Close	0.2	\$850	\$170	Email to EPO re: submission of construction evidence to architectural expert for corona, magnolia, riverside facility	Case Organization, Planning and Strategy
11/8/2021	Travis Close	0.2	\$850	\$170	Email to EPO re: new production for chatsworth facility	Case Organization, Planning and Strategy
11/8/2021	Travis Close	0.8	\$850	\$680	Review and analyze results for fire drills forms on Relativity to quantify amount produced by defendants	Discovery (Non-Deposition)
11/8/2021	Travis Close	0.9	\$850	\$765	meeting with architectural experts re: adequacy of existing records in possession to determine construction history of facilities	Discovery (Non-Deposition)
11/8/2021	Travis Close	0.9	\$850	\$765	Review and analyze best available evidence of construction history for Brookdale Magnolia	Discovery (Non-Deposition)
11/8/2021	Travis Close	0.4	\$850	\$340	City of corona building permit database search corona	Discovery (Non-Deposition)
11/8/2021	Travis Close	0.3	\$850	\$255	Review and analyze Def's section of joint letter brief re: agreements and our revised section	Discovery (Non-Deposition)
11/8/2021	Travis Close	0.7	\$850	\$595	Prepare list of City productions evidencing facility alterations for Corona, Magnolia, Riverside facilities for uploading to FTP site	Discovery (Non-Deposition)
11/8/2021	Travis Close	0.9	\$850	\$765	Analyze 2 productions by City of Corona for evidence of alterations pertaining to 1998 permit (B9805086) for Corona facility	Discovery (Non-Deposition)
11/8/2021	Travis Close	0.3	\$850	\$255	Review and revise final version of draft letter brief for grammar/spelling etc. before filing	Discovery (Non-Deposition)
11/8/2021	Travis Close	0.7	\$850	\$595	Analyze productions by City of Corona for evidence of alterations at Magnolia facility	Discovery (Non-Deposition)
11/8/2021	Travis Close	0.4	\$850	\$340	Review and analyze production (& online download instructions) by City of LA for Chatsworth facility	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/8/2021	Travis Close	1.0	\$850	\$850	Analyze proposed suggestions by June Kailes to make improvements to supplemental emergency evacuation plan analysis; email to JMP re: same	Experts (Including Retention)
11/8/2021	Travis Close	0.4	\$850	\$340	Analyze hard-to-read dates on original application for Corona facility building permit; email to expert, EPO re: dates of construction	Experts (Including Retention)
11/8/2021	Travis Close	0.2	\$850	\$170	Email to Jeff Mastin re: evidence of construction history at Corona, Magnolia, Riverside facilities	Experts (Including Retention)
11/9/2021	Guy Wallace	0.4	\$1,350	\$540	com's with RLS re com's with putative class members and family members; draft supplemental disclosures	Discovery (Non-Deposition)
11/9/2021	Guy Wallace	0.7	\$1,350	\$945	com's with DTM; BU; MTJ re D's subpoenas to Flores and Schroyer and responses thereto	Discovery (Non-Deposition)
11/9/2021	Guy Wallace	1.1	\$1,350	\$1,485	revise and edit draft supplemental disclosures pursuant to Rule 26(e)	Discovery (Non-Deposition)
11/9/2021	Guy Wallace	0.9	\$1,350	\$1,215	revise and edit draft letter brief re further class list; com's with JY; MTJ re same	Other Motions
11/9/2021	Mark Johnson	0.5	\$1,150	\$575	coms w/ GBW and DM re pricing for two-person or mechanical lift; review docs re same; scan and send to Marks and to RAB for supplemental production	Case Organization, Planning and Strategy
11/9/2021	Mark Johnson	0.3	\$1,150	\$345	calls w/ GBW re D's subpoenas on Schroyer and Flores, adequacy of notice; outline of proposed response to Maatman re documents requested by subpoenas	Discovery (Non-Deposition)
11/9/2021	Mark Johnson	0.3	\$1,150	\$345	draft email response to OC re docs requested by subpoenas, deficiencies of subpoenas, meeting and conferrin re same.	Discovery (Non-Deposition)
11/9/2021	Mark Johnson	0.3	\$1,150	\$345	coms w/ OC MJ re plaintiff deposition schedule adjustment and alternative format for uploaded pkg files; follow up w/ RAB and COC re same.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/9/2021	Mark Johnson	0.2	\$1,150	\$230	review and suggest edits to BU email to Aegis counsel re intent to produce depo transcript and as-filed task time document in response to discovery	Discovery (Non-Deposition)
11/9/2021	Mark Johnson	0.1	\$1,150	\$115	review and draft response to COC AX re discovery related to alter ego issues	Discovery (Non-Deposition)
11/9/2021	Mark Johnson	3.5	\$1,150	\$4,025	draft P section of letter brief iso mtc transportation polices, including research of prior correspondence, motions and orders for same	Other Motions
11/9/2021	Mark Johnson	1.8	\$1,150	\$2,070	review and revise draft section of letter brief from BU re production of resident files for residents identified in declarations	Other Motions
11/9/2021	Mark Johnson	0.4	\$1,150	\$460	review and provide edits for draft section of joint letter brief re resident contact information; coms w/ COC JY re same	Other Motions
11/9/2021	Rachel Steyer	0.2	\$750	\$150	reviewing earlier draft declaration for RVR	Class Certification
11/9/2021	Rachel Steyer	1.8	\$750	\$1,350	conducted intake call with witness	Class Outreach and Contact
11/9/2021	Rachel Steyer	0.2	\$750	\$150	call with GBW to discuss draft letter brief	Class Outreach and Contact
11/9/2021	Rachel Steyer	0.2	\$750	\$150	response to RVR concerning following up with declarant	Class Outreach and Contact
11/9/2021	Rachel Steyer	0.3	\$750	\$225	spoke with daughter in law of former resident, requested email to discuss with her husband	Class Outreach and Contact
11/9/2021	Rachel Steyer	0.2	\$750	\$150	spoke w/witness, family member only at Brookdale for few days	Class Outreach and Contact
11/9/2021	Rachel Steyer	0.5	\$750	\$375	follow up call with witness, discussed case, scheduled intake	Class Outreach and Contact
11/9/2021	Travis Close	0.2	\$850	\$170	Email to MTJ re: revisions to supplemental emergency evac analysis	Case Organization, Planning and Strategy
11/9/2021	Travis Close	0.2	\$850	\$170	Email to EPO re: new production by city of Bakersfield	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/9/2021	Travis Close	0.2	\$850	\$170	Email to EPO re: new production available for download from city of Bakersfield	Case Organization, Planning and Strategy
11/9/2021	Travis Close	1.3	\$850	\$1,105	Draft response to City of LA re: failure to adequately respond to public records act request	Discovery (Non-Deposition)
11/9/2021	Travis Close	0.9	\$850	\$765	Review and analyze draft transcript of doug cross deposition for obvious errors/accuracy	Discovery (Non-Deposition)
11/9/2021	Travis Close	0.5	\$850	\$425	Analyze production of Chatsworth facility documents by Dept of Building records (LA) for sufficiency/deficiencies	Discovery (Non-Deposition)
11/9/2021	Travis Close	0.6	\$850	\$510	Review, analyze and revise proposed joint letter brief section by JY (co-counsel) re: resident and class member contact info	Discovery (Non-Deposition)
11/9/2021	Travis Close	0.6	\$850	\$510	Analyze production by City of Riverside for responsiveness/adequacy to public records act request for building records	Discovery (Non-Deposition)
11/9/2021	Travis Close	0.7	\$850	\$595	Analyze production by City of Bakersfield for responsiveness/adequacy to public records act request for building records	Discovery (Non-Deposition)
11/9/2021	Travis Close	1.1	\$850	\$935	Review and analyze emails by Kelly Rubin re: ADA/accessibility/wheelchairs (potential deponent)	Discovery (Non-Deposition)
11/9/2021	Travis Close	0.2	\$850	\$170	Email to EPO re: docs produced by City of Whittier for Uptown Whittier facility	Discovery (Non-Deposition)
11/9/2021	Travis Close	0.4	\$850	\$340	Analyze production by City of Whittier for responsiveness/adequacy to public records act request for building records	Discovery (Non-Deposition)
11/9/2021	Travis Close	0.2	\$850	\$170	Review and analyze proposed email by MTJ re: objections to subpoenas served by experts	Experts (Including Retention)
11/9/2021	Travis Close	0.4	\$850	\$340	Analyze revisions to supplemental emergency and disaster chart by JMP according to assignment/instructions	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/10/2021	Guy Wallace	2.7	\$1,350	\$3,645	revise and edit draft supplemental disclosures; com's with MTJ; TCC; RLS re same	Discovery (Non-Deposition)
11/10/2021	Guy Wallace	0.5	\$1,350	\$675	revise and edit MTC re alleged local transportation policies; com's with MTJ re same	Other Motions
11/10/2021	Mark Johnson	0.1	\$1,150	\$115	email OC Jacobsen re schedule for Lindstrom and other P depos	Depositions
11/10/2021	Mark Johnson	1.5	\$1,150	\$1,725	begin review of Stiner texts for potential supplemental document production	Discovery (Non-Deposition)
11/10/2021	Mark Johnson	0.5	\$1,150	\$575	review and incorporate proposed edits from GBW to ltr brief on MTC local transportation policies, finalize and send to OC with cover email.	Other Motions
11/10/2021	Rachel Steyer	0.3	\$750	\$225	reviewing updated declaration provided by RVR	Class Certification
11/10/2021	Rachel Steyer	0.2	\$750	\$150	spoke with current resident, scheduled intake call	Class Outreach and Contact
11/10/2021	Rachel Steyer	0.4	\$750	\$300	call with family member, discussed case, gave contact info to pass along to sister whom caller said would be better to speak to	Class Outreach and Contact
11/10/2021	Rachel Steyer	0.5	\$750	\$375	began to conduct intake, family member did not hold POA, scheduled follow up call with husband who held POA to see if he would be interested in completing intake	Class Outreach and Contact
11/10/2021	Rachel Steyer	2.9	\$750	\$2,175	conducted intake with class member, created client folder, updated sharepoint	Class Outreach and Contact
11/10/2021	Rachel Steyer	0.4	\$750	\$300	adding entries of completed intakes to new and separate intakes and declaration spreadsheet for reply, adding corresponding intakes to proper folder	Class Outreach and Contact
11/10/2021	Rachel Steyer	0.2	\$750	\$150	communications on teams with TRB concerning outreach	Class Outreach and Contact
11/10/2021	Rachel Steyer	0.2	\$750	\$150	email to RVR concerning follow up questions and areas with draft declaration	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/10/2021	Travis Close	0.2	\$850	\$170	Email to doug cross re: issue with depo transcript corrections	Case Organization, Planning and Strategy
11/10/2021	Travis Close	0.2	\$850	\$170	Email to doug cross re: solutions for inputting depo transcript corrections	Case Organization, Planning and Strategy
11/10/2021	Travis Close	0.2	\$850	\$170	Email to GBW re: notes from last year on defendants' proposed list of custodians	Case Organization, Planning and Strategy
11/10/2021	Travis Close	1.3	\$850	\$1,105	Legal research re: whether certificates of occupancy are required to be maintained by building department	Case Organization, Planning and Strategy
11/10/2021	Travis Close	0.2	\$850	\$170	Email to EPO re: confirming no COO in possession for City of Anaheim	Case Organization, Planning and Strategy
11/10/2021	Travis Close	1.4	\$850	\$1,190	Legal research re: extent of corrections allowable for expert testimony to depo transcript	Discovery (Non-Deposition)
11/10/2021	Travis Close	0.4	\$850	\$340	Review and analyze RAB's notes from last year re: defendants' proposed list of custodians (rule 26 disclosures)	Discovery (Non-Deposition)
11/10/2021	Travis Close	0.7	\$850	\$595	Response by City of Anaheim - follow instructions to create account and search database for responsive records for Brookdale Anaheim (200 N. Dale Ave)	Discovery (Non-Deposition)
11/10/2021	Travis Close	0.8	\$850	\$680	Review and analyze records produced by City of Anaheim for certificate of occupancy and original application for building permit	Discovery (Non-Deposition)
11/10/2021	Travis Close	0.7	\$850	\$595	Review and analyze hot docs found by JMP in last two weeks re: service alignment	Discovery (Non-Deposition)
11/10/2021	Travis Close	0.3	\$850	\$255	Email to City of Anaheim re: no certificate of occupancy located for 200 N. Dale Ave	Discovery (Non-Deposition)
11/11/2021	Guy Wallace	0.8	\$1,350	\$1,080	preparation of preliminary outline of casemap of P's claims	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/11/2021	Guy Wallace	2.1	\$1,350	\$2,835	legal research and analysis re standards for liability re operators or managers of public accommodations; Neff v. Dairy Queen and issue of franchisor-franchisee relationship	Misc. Research
11/11/2021	Mark Johnson	1.7	\$1,150	\$1,955	prep for call w/ June Kailes to discuss depositions	Depositions
11/11/2021	Mark Johnson	0.2	\$1,150	\$230	call w/ June Kailes re depo prep and depo, rescheduling call	Depositions
11/11/2021	Mark Johnson	0.3	\$1,150	\$345	call w/ Rita Stiner re frustration in getting pricing information from BKD San Ramon and plan to re-evaluate Stacy.	Discovery (Non-Deposition)
11/12/2021	Guy Wallace	1.2	\$1,350	\$1,620	preparation of memo re D's potential arguments in opposition to MCC	Class Certification
11/12/2021	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ re preparation for Kailes depo	Depositions
11/12/2021	Guy Wallace	0.3	\$1,350	\$405	com's with Waters; TCC; EAO re depo preparation and construction history	Experts (Including Retention)
11/12/2021	Guy Wallace	2.4	\$1,350	\$3,240	revise and edit MTC's re class list; resident files; com's with JY; BU; MTJ re same	Other Motions
11/12/2021	Guy Wallace	0.5	\$1,350	\$675	review and analysis of March 18, 2021 hearing transcript cited by Defendants as precluding further discovery	Other Motions
11/12/2021	Mark Johnson	0.5	\$1,150	\$575	call w/ GBW re results of meeting w/ expert J Kailes, additional documents to provide her with, issue of BKD ownership and who payments are made to.	Case Organization, Planning and Strategy
11/12/2021	Mark Johnson	0.5	\$1,150	\$575	draft email description of assignment to JP re identifying copies of depo exhibits and tracking info re author, title, custodian, etc.; revise spreadsheet for use in project	Case Organization, Planning and Strategy
11/12/2021	Mark Johnson	1.4	\$1,150	\$1,610	zoom call w/ J Kailes, TCC re depo prep, depo notice and docs and publications requested.	Depositions
11/12/2021	Mark Johnson	1.0	\$1,150	\$1,150	prep for call w/ JK re depo prep	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/12/2021	Mark Johnson	0.4	\$1,150	\$460	call w/ client R. Stiner re interaction w/ BKD San Ramon officials re pricing	Discovery (Non-Deposition)
11/12/2021	Mark Johnson	0.1	\$1,150	\$115	review R Stiner email to ED San Ramon re billing	Discovery (Non-Deposition)
11/12/2021	Mark Johnson	0.2	\$1,150	\$230	draft email to OC re objections to subpoenas on Flores and Schroyer; link to FTP site for production of documents	Discovery (Non-Deposition)
11/12/2021	Mark Johnson	0.8	\$1,150	\$920	review and revise objections and responses to doc requests in Schroyer and Flores subpoenas; finalize same for service on Ds with documents	Discovery (Non-Deposition)
11/12/2021	Mark Johnson	0.6	\$1,150	\$690	multiple coms w/ Thornton, Marks, Bonner re objections and responses to subpoenas and transfer of docs to FTP site.	Discovery (Non-Deposition)
11/12/2021	Mark Johnson	0.9	\$1,150	\$1,035	call w/ AX and GCG re need for expert on alter ego / unity of interest expert, scope of expertise, types of docs to be considered, opinions needed and strategy	Experts (Including Retention)
11/12/2021	Mark Johnson	0.3	\$1,150	\$345	review notice of deposition of June kailes and document request for publications; compare list of publications with those in CV	Experts (Including Retention)
11/12/2021	Mark Johnson	0.1	\$1,150	\$115	email to OC re outstanding letter briefs and need for Ds sections	Other Motions
11/12/2021	Mark Johnson	0.4	\$1,150	\$460	calls w/ GBW re joint discovery letters on class members contact information and resident files; modifications to P's sections re same	Other Motions
11/12/2021	Rachel Steyer	1.9	\$750	\$1,425	drafting class member declaration	Class Certification
11/12/2021	Rachel Steyer	0.3	\$750	\$225	reviewing intake completed by DMS, adding comments	Class Outreach and Contact
11/12/2021	Rachel Steyer	0.2	\$750	\$150	email to DMS explaining comments and feedback following first intake	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/12/2021	Rachel Steyer	0.3	\$750	\$225	received follow up call from family member, rescheduled intake call, discussed update about her sister (current Brookdale resident)	Class Outreach and Contact
11/12/2021	Rachel Steyer	0.2	\$750	\$150	communications on teams with TRB, RVR, DMS concerning class outreach efforts	Class Outreach and Contact
11/12/2021	Rachel Steyer	0.2	\$750	\$150	follow up call with city officials to help reprocess and submit records request for unincorporated area of Sacramento	Discovery (Non-Deposition)
11/12/2021	Rachel Steyer	0.2	\$750	\$150	resubmitted public records request for unincorporated portion of facility in sacramento county	Discovery (Non-Deposition)
11/12/2021	Travis Close	0.3	\$850	\$255	Review and analyze updated version of construction history spreadsheet with additional applications for building permits & certificates of occupancy inputted	Case Organization, Planning and Strategy
11/12/2021	Travis Close	0.5	\$850	\$425	Prep for 2:00 meeting with june kailes re: depo prep (review progress on supplemental emergency evac analysis; take notes on elements for Drills and additional items for review	Case Organization, Planning and Strategy
11/12/2021	Travis Close	0.2	\$850	\$170	Email to EPO re: recent alterations evidence for chanate facility	Case Organization, Planning and Strategy
11/12/2021	Travis Close	0.4	\$850	\$340	Review and analyze plaintiffs' objections to defendants' subpoenas served on dale schroyer and cristina flores	Case Organization, Planning and Strategy
11/12/2021	Travis Close	0.2	\$850	\$170	Review and analyze notice of deposition of june kailes & list of publications to bring during depo	Depositions
11/12/2021	Travis Close	0.3	\$850	\$255	Review progress by JMP in draft spreadsheet analyzing duplicates of Exhibits filed in depositions thus far	Depositions
11/12/2021	Travis Close	1.6	\$850	\$1,360	meeting with June Kailes, MTJ re: locating publications requested in notice of deposition; responses and objections; and depo prep strategy	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/12/2021	Travis Close	0.3	\$850	\$255	Review and analyze allegations & brookdale's response in NBC news story about brookdale senior living & lawsuit	Discovery (Non-Deposition)
11/12/2021	Travis Close	0.3	\$850	\$255	Review and analyze White Paper by defense counsel re: surviving class actions in senior living industry	Discovery (Non-Deposition)
11/12/2021	Travis Close	0.4	\$850	\$340	Review and analyze draft letter brief (& addition of Defendants' section re: production of class member files	Discovery (Non-Deposition)
11/12/2021	Travis Close	0.4	\$850	\$340	Review and analyze documents produced by city of rancho Mirage for responsive material re: building records	Discovery (Non-Deposition)
11/12/2021	Travis Close	0.3	\$850	\$255	Analyze docs produced by city of Roseville for responsiveness to PRA request	Discovery (Non-Deposition)
11/12/2021	Travis Close	1.1	\$850	\$935	Draft new PRA request to City of Los Angeles following no response to efforts to correct deficiencies in prior response	Discovery (Non-Deposition)
11/12/2021	Travis Close	0.4	\$850	\$340	Review and analyze joint letter bried re: resident contact information	Discovery (Non-Deposition)
11/12/2021	Travis Close	1.4	\$850	\$1,190	Begin preparing objections & responses to notice of deposition of june kailes	Discovery (Non-Deposition)
11/12/2021	Travis Close	0.3	\$850	\$255	Analyze elements for audits of fire drills by JIK	Experts (Including Retention)
11/15/2021	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ re preparation for deposition of Kailes; D's responses to P's MTC's	Discovery (Non-Deposition)
11/15/2021	Guy Wallace	0.6	\$1,350	\$810	review and analysis of Waters analysis of construction history dates; com's with Waters re same	Experts (Including Retention)
11/15/2021	Guy Wallace	1.2	\$1,350	\$1,620	review and analysis of D's responses to P's MTC's re facility-level transportation policies; resident files for P's class cert declarants; class list; com's with JY; BU; MTJ re same	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/15/2021	Mark Johnson	0.4	\$1,150	\$460	com w/ TCC re objections to Kailes depo notice; identification and collection of additional materials for her review; content and accuracy of chart of local emergency plans,	Depositions
11/15/2021	Mark Johnson	2.5	\$1,150	\$2,875	continue review of S. Stiner texts for relevant texts for supplemental production.	Discovery (Non-Deposition)
11/15/2021	Mark Johnson	2.0	\$1,150	\$2,300	search for and review documents in production bearing on BSL receipt of payments from residents and other evidence of BSL central operation and control of finances	Discovery (Non-Deposition)
11/15/2021	Mark Johnson	0.4	\$1,150	\$460	draft email memo to staff, COC, re preliminary results of research re BSL control of finances and central receipt of payments and providing guidance for completion of and scope of research	Discovery (Non-Deposition)
11/15/2021	Mark Johnson	0.3	\$1,150	\$345	draft instructions for review of Stiner texts for potential supplemental production.	Discovery (Non-Deposition)
11/15/2021	Mark Johnson	1.8	\$1,150	\$2,070	review D section of joint ltr brief re local transportation policies; draft revisions to P section based on same	Other Motions
11/15/2021	Rachel Steyer	1.0	\$750	\$750	drafting fact witness declaration	Class Certification
11/15/2021	Rachel Steyer	0.2	\$750	\$150	received call back from family member, discussed case, scheduled intake	Class Outreach and Contact
11/15/2021	Rachel Steyer	0.4	\$750	\$300	follow up call with current resident, still wanted more time to consider whether to serve as declarant, scheduled follow up call	Class Outreach and Contact
11/15/2021	Rachel Steyer	0.4	\$750	\$300	follow up call with family member, discussed case, scheduled follow up call, requested email with contact info	Class Outreach and Contact
11/15/2021	Rachel Steyer	0.2	\$750	\$150	received call back from family member of current resident, rescheduled intake call	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/15/2021	Rachel Steyer	0.4	\$750	\$300	editing and reviewing DSM completed intake with potential declarant	Class Outreach and Contact
11/15/2021	Rachel Steyer	0.2	\$750	\$150	email to DMS with comments and feedback on intake and declaration drafting	Class Outreach and Contact
11/15/2021	Rachel Steyer	0.3	\$750	\$225	call back to family member, discussed case, scheduled intake call	Class Outreach and Contact
11/15/2021	Rachel Steyer	0.4	\$750	\$300	communications on teams with TRB, RVR, DMS, RDR, PXM concerning outreach efforts and staffing	Class Outreach and Contact
11/15/2021	Rachel Steyer	0.4	\$750	\$300	reviewing correspondence and responses from outstanding public records request, submitting new one to missing county, forwarding documents to TCC, EPO, RAB	Discovery (Non-Deposition)
11/15/2021	Travis Close	0.4	\$850	\$340	Call with MTJ re: Thursday's depo prep and Fri deposition with June Kailes	Case Organization, Planning and Strategy
11/15/2021	Travis Close	0.2	\$850	\$170	Email to EPO re: docs produced by City of LA for chatsworth facility	Case Organization, Planning and Strategy
11/15/2021	Travis Close	0.2	\$850	\$170	Email to MTJ re: list of docs sent to June Kailes after declaration filed	Case Organization, Planning and Strategy
11/15/2021	Travis Close	0.9	\$850	\$765	Legal research re: whether documents that have already been produced must be reproduced (Kailes depo notice objections)	Depositions
11/15/2021	Travis Close	0.8	\$850	\$680	Legal research re: whether parties must produce docs subject to copyright laws	Depositions
11/15/2021	Travis Close	0.5	\$850	\$425	Continue drafting objections to Kailes depo notice	Depositions
11/15/2021	Travis Close	0.2	\$850	\$170	Email to MTJ re: draft objections to June Kailes depo notice	Depositions
11/15/2021	Travis Close	0.4	\$850	\$340	Review and analyze latest production from City of LA from Brookdale Chatsworth for compliance with PRA request	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/15/2021	Travis Close	0.3	\$850	\$255	Review and analyze evidence of 2017 renovation at Santa Rosa facility provided by EPO	Discovery (Non-Deposition)
11/15/2021	Travis Close	0.3	\$850	\$255	Access documents produced on Redwood City's database	Discovery (Non-Deposition)
11/15/2021	Travis Close	0.2	\$850	\$170	Email to EPO re: docs produced by Redwood City	Discovery (Non-Deposition)
11/15/2021	Travis Close	0.3	\$850	\$255	Review and analyze sections by Ps and Ds in joint letter brief re: transportation policies	Discovery (Non-Deposition)
11/15/2021	Travis Close	0.2	\$850	\$170	Email to EPO re: ambiguity in original building permit applicaiton for Chatsworth facility	Discovery (Non-Deposition)
11/15/2021	Travis Close	1.9	\$850	\$1,615	Analyze supplemental emergency evacuation plans not previous produced to June Kailes; prepare for supplemental production	Discovery (Non-Deposition)
11/16/2021	Guy Wallace	0.8	\$1,350	\$1,080	revise and edit Brookdale task list; circulate to co-counsel in preparation for team call set for 11/17	Case Organization, Planning and Strategy
11/16/2021	Guy Wallace	0.3	\$1,350	\$405	com's with DTM; MTJ re D's failure to produce complete assessment data	Discovery (Non-Deposition)
11/16/2021	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of Waters chart re construction history of inspected facilities; com's with Waters re same (.3)	Experts (Including Retention)
11/16/2021	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW re discovery letters, Kailes depo prep	Case Organization, Planning and Strategy
11/16/2021	Mark Johnson	1.5	\$1,150	\$1,725	prep for Kailes depo: review list of local supplemental emergency plans and revise spreadsheet for same	Depositions
11/16/2021	Rachel Steyer	0.2	\$750	\$150	spoke with family member of current resident, requested follow up call after holidays so she can confer with other family members	Class Outreach and Contact
11/16/2021	Rachel Steyer	2.1	\$750	\$1,575	conducted and complted intake with former resident, created intake folder, updated sharepoint	Class Outreach and Contact
11/16/2021	Rachel Steyer	0.2	\$750	\$150	communications on teams with RVR, DMS, PXM concerning outreach efforts	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/16/2021	Rachel Steyer	0.2	\$750	\$150	email to RDR concerning intakes and class outreach	Class Outreach and Contact
11/16/2021	Rachel Steyer	0.6	\$750	\$450	conversations with officials at sacramento county building and assessor's offices to try to locate responsive documents to public records request	Discovery (Non-Deposition)
11/16/2021	Rachel Steyer	1.0	\$750	\$750	reviewing, searching for, gathering, and organizing documents in relativity corresponding to potential new declarants for reply	Discovery (Non-Deposition)
11/16/2021	Travis Close	0.3	\$850	\$255	Reply to MTJ re: analysis of supplemental evaluation plans sent to Kailes pre/post declaration filing	Case Organization, Planning and Strategy
11/16/2021	Travis Close	0.2	\$850	\$170	Email to MTJ re: edited notes from last week's call with june kailes	Case Organization, Planning and Strategy
11/16/2021	Travis Close	0.3	\$850	\$255	Review and analyze updated construction history spreadsheet by EPO	Case Organization, Planning and Strategy
11/16/2021	Travis Close	0.8	\$850	\$680	Investigate whether June Kailes was deposed/testified in cases identified in her declaration (response to notice of depo)	Depositions
11/16/2021	Travis Close	1.5	\$850	\$1,275	Continue drafting Kailes objections and responses to notice of deposition and to produce information/documents	Depositions
11/16/2021	Travis Close	0.3	\$850	\$255	Review and analyze new DSS facility evaluation reports and complaint investigation reports for Sunwest, Oceanside, and Tracy facilities	Discovery (Non-Deposition)
11/16/2021	Travis Close	0.2	\$850	\$170	Review latest draft of chart by JMP analyzing duplicates produced of certain Exhibits introduced in depositions thus far	Discovery (Non-Deposition)
11/16/2021	Travis Close	0.6	\$850	\$510	Draft new public records act request to City of San Diego for brookdale carmel valley & claremont facilities	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/16/2021	Travis Close	0.4	\$850	\$340	Email to City of Oceanside disputing that PRA request has been filled, and asking for responsive records dating to 1984-1986	Discovery (Non-Deposition)
11/16/2021	Travis Close	0.2	\$850	\$170	Email to EPO re: building permit applications located for north tarzana and south tarzana facilities	Discovery (Non-Deposition)
11/16/2021	Travis Close	0.3	\$850	\$255	Review available construction history evidence for N. Tarzana and S. Tarzana facilities; download building permit applications from City database	Discovery (Non-Deposition)
11/16/2021	Travis Close	1.1	\$850	\$935	Legal research re: whether depositions are common for experts retained in post-settlement actions	Experts (Including Retention)
11/16/2021	Travis Close	0.4	\$850	\$340	Review and analyze edits to supplemental emergency evacuation plan chart by MTJ	Experts (Including Retention)
11/17/2021	Guy Wallace	1.1	\$1,350	\$1,485	team Zoom with GG; JY; AX; BU; MTJ; TCC; RLS re discovery and preparation for class cert reply	Case Organization, Planning and Strategy
11/17/2021	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re further discovery tasks and preparation for Kailes; Waters; Mastin depositions	Discovery (Non-Deposition)
11/17/2021	Mark Johnson	1.0	\$1,150	\$1,150	team zoom call re status of various projects, deposition scheduling, case mapping, construction history for experts, retention of other experts.	Case Organization, Planning and Strategy
11/17/2021	Mark Johnson	1.1	\$1,150	\$1,265	calls w/ GBW (x5) re Kailes depo and response to document requests; additional discovery including computer program for determining benchmarks, operation plans; discovery letter briefs	Case Organization, Planning and Strategy
11/17/2021	Mark Johnson	3.5	\$1,150	\$4,025	prepare for depo and depo prep session for June Kailes, including review and organization of documents; development of potential questions.	Depositions
11/17/2021	Mark Johnson	0.8	\$1,150	\$920	revise and add to draft response and objections to D's notice of deposition for Kailes	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/17/2021	Mark Johnson	0.5	\$1,150	\$575	email communications w/ TCC re Kailes depo prep, response to depo notice and docs provided for her review.	Depositions
11/17/2021	Mark Johnson	0.5	\$1,150	\$575	draft email and response to Ds email re production of Plaintiff files and connection to Plaintiff depositions.	Discovery (Non-Deposition)
11/17/2021	Rachel Steyer	1.0	\$750	\$750	bi-weekly meeting with GBW, TCC, MTJ and co-counsel to review and discuss outstanding tasks and assignments	Case Organization, Planning and Strategy
11/17/2021	Rachel Steyer	0.3	\$750	\$225	follow up call with likely declarant to review additional questions in intake	Class Outreach and Contact
11/17/2021	Rachel Steyer	0.2	\$750	\$150	email to RDR concerning outreach efforts	Class Outreach and Contact
11/17/2021	Rachel Steyer	0.4	\$750	\$300	call with family member, discussed case, scheduled follow up call	Class Outreach and Contact
11/17/2021	Rachel Steyer	0.5	\$750	\$375	follow up call with likely declarant to review additional added questions in intake	Class Outreach and Contact
11/17/2021	Rachel Steyer	0.3	\$750	\$225	reviewing and providing feedback and comments to DMS intake	Class Outreach and Contact
11/17/2021	Rachel Steyer	0.4	\$750	\$300	call with DSM to discuss and review intake	Class Outreach and Contact
11/17/2021	Rachel Steyer	0.3	\$750	\$225	received call back from family member, discussed case, determined she would not be the best fit for intake because she did not hold POA	Class Outreach and Contact
11/17/2021	Rachel Steyer	0.2	\$750	\$150	reviewing RDR partially completed intake	Class Outreach and Contact
11/17/2021	Rachel Steyer	0.3	\$750	\$225	reviewing document production for records corresponding to potential declarant	Discovery (Non-Deposition)
11/17/2021	Rachel Steyer	0.2	\$750	\$150	reviewing email from co-counsel outlining current status of pendant data	Discovery (Non-Deposition)
11/17/2021	Travis Close	1.0	\$850	\$850	team meeting with RLS, MTJ, GBW, and co-counsel re: joint discovery letters, resuming inspections, corporations expert, and upcoming depositions	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/17/2021	Travis Close	0.3	\$850	\$255	Email to MTJ with notes on specific items to produce in advance of Kailes deposition	Case Organization, Planning and Strategy
11/17/2021	Travis Close	0.2	\$850	\$170	Email to City of Oceanside re: confirmation that no original building permit application or certificate of occupancy exists	Case Organization, Planning and Strategy
11/17/2021	Travis Close	0.3	\$850	\$255	Review and analyze final version of joint letter brief re: resident contact information before filing	Discovery (Non-Deposition)
11/17/2021	Travis Close	0.3	\$850	\$255	Review and analyze final version of joint letter brief re: local transportation policies before filing	Discovery (Non-Deposition)
11/17/2021	Travis Close	0.7	\$850	\$595	Review and analyze prior communications re: fire drills to determine extent of analysis conducted thus far (Kailes depo prep)	Discovery (Non-Deposition)
11/17/2021	Travis Close	1.4	\$850	\$1,190	Review and analyze fire drill results from Relativity (5,000+) to determine criteria for culling results to responsive docs	Discovery (Non-Deposition)
11/17/2021	Travis Close	0.9	\$850	\$765	Apply metadata terms to (5,000+) fire drill results to cull results to actual fire drill reports at facilities; export to spreadsheet	Discovery (Non-Deposition)
11/17/2021	Travis Close	0.2	\$850	\$170	Email to EPO re: confirmation by Oceanside that no more records will be produced	Discovery (Non-Deposition)
11/17/2021	Travis Close	0.2	\$850	\$170	Email to RAB, EPO, MTJ re: meeting schedule for monday to discuss supplemental productions	Discovery (Non-Deposition)
11/17/2021	Travis Close	1.6	\$850	\$1,360	Create index of sample fire drills from each facility in which drills were produced (Kailes depo prep); download to client folder	Discovery (Non-Deposition)
11/18/2021	Mark Johnson	5.0	\$1,150	\$5,750	depo prep with June Kailes, TCC in person	Depositions
11/18/2021	Mark Johnson	4.5	\$1,150	\$5,175	travel to LA for depo prep with June Kailes	Depositions
11/18/2021	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW re Kailes depo prep	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/18/2021	Mark Johnson	0.3	\$1,150	\$345	review edits to response to Kailes depo notice, make additional edits and finalize same, com w/ TCC re same	Depositions
11/18/2021	Rachel Steyer	0.2	\$750	\$150	editing and finalizing RVR draft declaration	Class Certification
11/18/2021	Rachel Steyer	0.6	\$750	\$450	weekly outreach meeting to discuss Brookdale outreach efforts	Class Outreach and Contact
11/18/2021	Rachel Steyer	1.6	\$750	\$1,200	conducted intake call with family member, created folder, updated sharepoint	Class Outreach and Contact
11/18/2021	Rachel Steyer	0.3	\$750	\$225	reviewing status of outstanding public records requests	Discovery (Non-Deposition)
11/18/2021	Travis Close	0.2	\$850	\$170	Email to JIK re supplemental emergency plan analysis	Case Organization, Planning and Strategy
11/18/2021	Travis Close	0.3	\$850	\$255	Review and analyze docs received by jeanette algarne for info re: accounting records/corporate control	Case Organization, Planning and Strategy
11/18/2021	Travis Close	0.7	\$850	\$595	Further revisions to draft objections and responses to Notice of Kailes deposition and to produce documents	Depositions
11/18/2021	Travis Close	0.6	\$850	\$510	Analyze communications with June Kailes to ensure that all docs sent to her were included in response to def's notice of depositions and requests for docs	Depositions
11/18/2021	Travis Close	0.4	\$850	\$340	Further revisions to responses and objections to Kailes notice of deposition	Depositions
11/18/2021	Travis Close	1.3	\$850	\$1,105	Travel for deposition/prep of June Kailes, part II: Walk to BART; BART to Oakland airport	Depositions
11/18/2021	Travis Close	4.7	\$850	\$3,995	Travel for deposition/prep of June Kailes, part II: Flight from OAK to LAX; then rent car and travel to Office of June Kailes	Depositions
11/18/2021	Travis Close	4.5	\$850	\$3,825	Depo prep with June Kailes and MTJ (Part II)	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/19/2021	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of sealed district court opinion granting class certification in Heredia v. Sunrise; comparison to facts presented herein	Class Certification
11/19/2021	Guy Wallace	0.8	\$1,350	\$1,080	com's with RLS re revisions to draft supplemental Initial Disclosures	Discovery (Non-Deposition)
11/19/2021	Mark Johnson	0.8	\$1,150	\$920	expert June Kailes depo - pre-depo confernce w/ witness and TCC and set up, connect to Zoom video for same	Depositions
11/19/2021	Mark Johnson	3.5	\$1,150	\$4,025	return travel from depo	Depositions
11/19/2021	Mark Johnson	0.5	\$1,150	\$575	post deposition conference w/ TCC, expert June Kailes re testimony provided, next steps	Experts (Including Retention)
11/19/2021	Rachel Steyer	0.4	\$750	\$300	follow up call with family member, discussed case, scheduled intake call	Class Outreach and Contact
11/19/2021	Rachel Steyer	1.0	\$750	\$750	call with GBW to discuss and review supplemental initial disclosures	Discovery (Non-Deposition)
11/19/2021	Rachel Steyer	0.6	\$750	\$450	reviewed and gathered documents for likely declarant	Discovery (Non-Deposition)
11/19/2021	Rachel Steyer	4.5	\$750	\$3,375	darfting and revising supplemental initial disclosures, reviewing and incorporating GBW edits	Discovery (Non-Deposition)
11/19/2021	Travis Close	0.5	\$850	\$425	June Kailes deposition -- bike from hotel to office of J. Kailes	Depositions
11/19/2021	Travis Close	0.3	\$850	\$255	Email to Def's counsel re: objections and responses to notice of Kailes deposition	Depositions
11/19/2021	Travis Close	1.1	\$850	\$935	Final prep with witness and MTJ before Kailes deposition	Depositions
11/19/2021	Travis Close	8.7	\$850	\$7,395	Deposition of June Kailes -- 9:15-5:30	Depositions
11/20/2021	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW re Kailes deposition and follow-up	Depositions
11/20/2021	Mark Johnson	0.2	\$1,150	\$230	review and draft response to J Thornton re scope of missing data and comparison of data production end dates, strategy for further production demand on Defendnts	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/20/2021	Mark Johnson	0.4	\$1,150	\$460	draft email to co-counsel re research and documents needed for meet and confer w/ OC concerning Plaintiff files	Discovery (Non-Deposition)
11/21/2021	Guy Wallace	0.9	\$1,350	\$1,215	preparation for deposition of Waters; potential topics and questions re same	Depositions
11/21/2021	Mark Johnson	0.3	\$1,150	\$345	draft email to staff and TCC identifying materials and information to collect for T Stiner depo prep.	Depositions
11/21/2021	Mark Johnson	0.2	\$1,150	\$230	review prior correspondence re production of resident files provided by COC	Discovery (Non-Deposition)
11/21/2021	Mark Johnson	2.2	\$1,150	\$2,530	Draft seventh set of document requests	Discovery (Non-Deposition)
11/22/2021	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of draft of further set of RFPs (set seven); com's with MTJ re same (.4) and discovery re named P's	Discovery (Non-Deposition)
11/22/2021	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW re new set of doc requests, pending discovery motions, timing of any further settlement discussions, proposed call w/ COC.	Case Organization, Planning and Strategy
11/22/2021	Mark Johnson	0.1	\$1,150	\$115	review and respond to emails from CH re class notice.	Class Certification
11/22/2021	Mark Johnson	0.9	\$1,150	\$1,035	study revised data audit from JT in tandem with revised draft email to co-counsel and prior email/audit report	Discovery (Non-Deposition)
11/22/2021	Mark Johnson	0.3	\$1,150	\$345	call w/ Jim Thornton re questions concerning data audit and draft email to OC re missing data	Discovery (Non-Deposition)
11/22/2021	Mark Johnson	0.5	\$1,150	\$575	call w/ EO and TCC re collection and sharing with Ds of all docs received pursuant to subpoena from third party government entities re facility construction.	Discovery (Non-Deposition)
11/22/2021	Mark Johnson	0.2	\$1,150	\$230	call w/ GCG re draft seventh set of document requests.	Discovery (Non-Deposition)
11/22/2021	Mark Johnson	0.4	\$1,150	\$460	add to, revise and finalize 7th set of document requests, com w/ LEC re filing and service	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/22/2021	Mark Johnson	0.2	\$1,150	\$230	review Order from Judge Beeler on three discovery motions	Discovery (Non-Deposition)
11/22/2021	Mark Johnson	0.1	\$1,150	\$115	email exchange w/ expert agency re corporate expert	Experts (Including Retention)
11/22/2021	Mark Johnson	0.1	\$1,150	\$115	email exchange w / Amy Xu re corporate expert Solomon, meeting time and conflicts check. Send list of subsidiaries for same.	Experts (Including Retention)
11/22/2021	Mark Johnson	0.2	\$1,150	\$230	call w/ gbw re discovery order and issues to be raised at discovery conference, requested submission re schedule	Other Motions
11/22/2021	Rachel Steyer	0.6	\$750	\$450	finishing drafting declaration for class witness	Class Certification
11/22/2021	Rachel Steyer	1.4	\$750	\$1,050	completing drafting fact witness declaration	Class Certification
11/22/2021	Rachel Steyer	2.1	\$750	\$1,575	drafting, editing, revising class member declaration	Class Certification
11/22/2021	Rachel Steyer	0.2	\$750	\$150	reviewing completed RVR intake	Class Outreach and Contact
11/22/2021	Rachel Steyer	0.2	\$750	\$150	follow up call with resident to discuss possibility of serving as declarant, requested additional follow up call	Class Outreach and Contact
11/22/2021	Rachel Steyer	0.6	\$750	\$450	conducted partial intake with family member of current resident, scheduled call to continue intake	Class Outreach and Contact
11/22/2021	Rachel Steyer	0.2	\$750	\$150	attempting to reach city clerk/county officials to discuss document requests, leaving VMs	Discovery (Non-Deposition)
11/22/2021	Rachel Steyer	0.7	\$750	\$525	reviewing EPO construction history spreadsheet to determine updated status of PRA requests and documents needed	Discovery (Non-Deposition)
11/22/2021	Travis Close	0.4	\$850	\$340	Email to RLS re: strategies for compelling meaningful responses to PRA requests	Case Organization, Planning and Strategy
11/22/2021	Travis Close	0.2	\$850	\$170	Review and analyze summary/notes from GCG (co-counsel) re: early steps taken in case to obtain resident files	Case Organization, Planning and Strategy
11/22/2021	Travis Close	0.4	\$850	\$340	Meeting with EPO, MTJ re: supplemental document production to defendants	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/22/2021	Travis Close	0.2	\$850	\$170	Review and revise draft set of seventh document request (RFPs)	Discovery (Non-Deposition)
11/22/2021	Travis Close	0.3	\$850	\$255	Review and analyze court's order re: discovery disputes in ECF Nos. 322-325	Discovery (Non-Deposition)
11/22/2021	Travis Close	0.5	\$850	\$425	Email to MTJ. EPO, RLS, GBW re: instructions for assignment involving organization of building records received, and bates stamping, then sharing with defendants	Discovery (Non-Deposition)
11/22/2021	Travis Close	1.7	\$850	\$1,445	Create chart analyzing status of building records received by city, with previous bates numbering included -- organization required for next sharing of records with defendants	Discovery (Non-Deposition)
11/22/2021	Travis Close	0.8	\$850	\$680	Review and analyze dec of Jeff Mastin for cites to deposition testimony; pull testimony and send to him for further review	Experts (Including Retention)
11/22/2021	Travis Close	0.9	\$850	\$765	Begin preparing doug cross errata sheet (depo part I) based on Cross notes	Experts (Including Retention)
11/23/2021	Guy Wallace	0.8	\$1,350	\$1,080	preparation of potential topics and questions re Waters deposition	Depositions
11/23/2021	Guy Wallace	0.4	\$1,350	\$540	preparation of topics and questions re Flores depo; com's with DTM and JT re same	Depositions
11/23/2021	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re depositions of named Plaintiffs; meet and confer with D's re P's resident files; preparation of staffing analysis for all facilities	Discovery (Non-Deposition)
11/23/2021	Guy Wallace	0.7	\$1,350	\$945	com's with Waters re depo preparation	Experts (Including Retention)
11/23/2021	Guy Wallace	0.6	\$1,350	\$810	com's with GG; MTJ re settlement and strategy re same	Settlement
11/23/2021	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW,, GCG re protocol for settlement discussions and communications w/ OC	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/23/2021	Mark Johnson	0.3	\$1,150	\$345	meet and confer w/ OC Jacobsen and Riley, with BU re Plaintiff depos and production of Plaintiff resident files.	Discovery (Non-Deposition)
11/23/2021	Mark Johnson	0.2	\$1,150	\$230	prep for meet and confer re production of Plaintiff resident files, including review of related order and 6th set of document requests	Discovery (Non-Deposition)
11/23/2021	Mark Johnson	1.5	\$1,150	\$1,725	prepare draft joint statement for submission to Judge Beeler re case schedule, review docket and prior orders for same.	Other Motions
11/23/2021	Rachel Steyer	1.0	\$750	\$750	finished drafting class member declaration	Class Certification
11/23/2021	Rachel Steyer	1.0	\$750	\$750	reviewing and revising and finishing older draft declaration	Class Certification
11/23/2021	Rachel Steyer	0.9	\$750	\$675	drafting class member declaration	Class Certification
11/23/2021	Rachel Steyer	0.5	\$750	\$375	editing and working on class member declaration	Class Certification
11/23/2021	Rachel Steyer	0.3	\$750	\$225	reviewing completed AXW intake	Class Outreach and Contact
11/23/2021	Rachel Steyer	0.2	\$750	\$150	email to AXW providing feedback concerning intake	Class Outreach and Contact
11/23/2021	Rachel Steyer	0.9	\$750	\$675	call with declarant to go over and review additional intake questions, revising and updating intake	Class Outreach and Contact
11/23/2021	Rachel Steyer	0.3	\$750	\$225	communications with RVR and AXW on teams to discuss outreach efforts and communications with class member	Class Outreach and Contact
11/23/2021	Rachel Steyer	0.2	\$750	\$150	reviewing esi production for documents corresponding to potential declarant family member	Discovery (Non-Deposition)
11/23/2021	Travis Close	0.2	\$850	\$170	Email to MTJ re: changes made to doug cross errata sheet	Case Organization, Planning and Strategy
11/23/2021	Travis Close	0.3	\$850	\$255	Call with City of Bakersfield re: deficiencies in production of building records	Case Organization, Planning and Strategy
11/23/2021	Travis Close	0.2	\$850	\$170	Email to EPO re: updates to bakersfield building records	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/23/2021	Travis Close	1.9	\$850	\$1,615	Depo errata -- Analyze proposed line chages to depo (part I) in errata by doug cross for accuracy and re-draft errata sheet	Depositions
11/23/2021	Travis Close	0.2	\$850	\$170	Email to EPO re: docs produced by City of Jurupa Valley	Discovery (Non-Deposition)
11/23/2021	Travis Close	0.4	\$850	\$340	Review and analyze Log of Supplemental facility documents by EPO in prep for production to defendants	Discovery (Non-Deposition)
11/23/2021	Travis Close	0.5	\$850	\$425	Review and analyze docs produced by City of Bakersfield for sufficiency (missing Certificates of occupancy)	Discovery (Non-Deposition)
11/23/2021	Travis Close	0.6	\$850	\$510	Analyze records produced by Sacramento County for Orangevale facility for evidence of year of CBC applied to facility	Discovery (Non-Deposition)
11/23/2021	Travis Close	1.1	\$850	\$935	Review, analyze and code sample fire drills for date/facility -- # BKD0063215-BKD1805500 (1-29 of 56)	Discovery (Non-Deposition)
11/23/2021	Travis Close	0.9	\$850	\$765	Review, analyze and code sample fire drills for date/facility -- # BKD1805500-BKD1807677 (29-56 of 56)	Discovery (Non-Deposition)
11/24/2021	Guy Wallace	1.2	\$1,350	\$1,620	preparation of potential topics and questions re Waters depo	Depositions
11/24/2021	Mark Johnson	0.1	\$1,150	\$115	email exchange w/ D Cross re depo and depo prep	Depositions
11/24/2021	Mark Johnson	0.2	\$1,150	\$230	call w/ RAB re production of construction-related data from gov agencies and supplemental plaintiff document production; email exchange w/ RAB, AX re jestrabek-hart docs	Discovery (Non-Deposition)
11/24/2021	Mark Johnson	0.1	\$1,150	\$115	email exchange w/ OC GLM re missing data	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/24/2021	Mark Johnson	0.1	\$1,150	\$115	email to OC re new production of docs produced by third parties pursuant to subpoena and plaintiff supplemental production	Discovery (Non-Deposition)
11/24/2021	Rachel Steyer	0.3	\$750	\$225	call with former resident, discussed issues but not interested in serving as declarant/participating further	Class Outreach and Contact
11/24/2021	Rachel Steyer	0.2	\$750	\$150	spoke with family member, scheduled follow up call	Class Outreach and Contact
11/24/2021	Rachel Steyer	0.6	\$750	\$450	call with family member of former resident, discussed case, he requested an email with more info to review and think about whether ot participate	Class Outreach and Contact
11/24/2021	Rachel Steyer	0.2	\$750	\$150	spoke with former resident, experiences fell outside class period	Class Outreach and Contact
11/24/2021	Rachel Steyer	2.8	\$750	\$2,100	continuing to add to and update supplemental initial disclosures: identifying and adding additional witnesses, updating exhibit descriptions	Discovery (Non-Deposition)
11/24/2021	Travis Close	0.2	\$850	\$170	Email to EPO re: missing records from City of Bakersfield	Case Organization, Planning and Strategy
11/24/2021	Travis Close	0.2	\$850	\$170	Email to LEC re: last week's deposition of june kailes	Case Organization, Planning and Strategy
11/24/2021	Travis Close	0.2	\$850	\$170	Email to GBW, MTJ re: dates included within database of residency agreements produced by Brookdale	Case Organization, Planning and Strategy
11/24/2021	Travis Close	0.2	\$850	\$170	Email to LEC re: template for objections and responses to notice of deposition	Depositions
11/24/2021	Travis Close	0.6	\$850	\$510	Analyze database of residency agreements to determine date ranges	Discovery (Non-Deposition)
11/24/2021	Travis Close	0.5	\$850	\$425	Review and analyze updated DSS reports and complaint investigation reports for Lodi, Roseville, Irvine, Napa, and Uptown Whittier facilities	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/24/2021	Travis Close	1.4	\$850	\$1,190	Analyze emergency evacuation plans in DSS-produced files for elements in HSC 1569.695 -- transportation providers	Discovery (Non-Deposition)
11/24/2021	Travis Close	1.6	\$850	\$1,360	Analyze emergency evacuation plans in DSS-produced files for elements in HSC 1569.695 -- (H) procedures for confirming location of resident during emergency response	Discovery (Non-Deposition)
11/24/2021	Travis Close	1.1	\$850	\$935	Analyze emergency evacuation plans in DSS-produced files for elements in HSC 1569.695 -- resident roster & appraisal of resident needs	Discovery (Non-Deposition)
11/25/2021	Guy Wallace	1.1	\$1,350	\$1,485	preparation of potential topics and questions for Waters depo	Depositions
11/26/2021	Guy Wallace	2.5	\$1,350	\$3,375	preparation of potential topics and questions for Waters depo	Depositions
11/28/2021	Guy Wallace	2.2	\$1,350	\$2,970	preparation of potential topics and questions for Waters deposition; analysis of same and obligations imposed by Title III regulations on Brookdale facilities	Depositions
11/29/2021	Guy Wallace	1.2	\$1,350	\$1,620	com's with Maatman re 11/30/21 submission to MJ Beeler re case schedule; revise and edit same	Discovery (Non-Deposition)
11/29/2021	Guy Wallace	1.1	\$1,350	\$1,485	preparation of categories of remaining discovery and proposed assignments amongst co-counsel re same; agenda re 12/1/21 team call	Discovery (Non-Deposition)
11/29/2021	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ re further areas of discovery; expert deposition preparation	Discovery (Non-Deposition)
11/29/2021	Guy Wallace	1.4	\$1,350	\$1,890	prepare for and participate in teams call re draft reports and deposition preparation with Waters; Mastin; TCC	Experts (Including Retention)
11/29/2021	Guy Wallace	0.9	\$1,350	\$1,215	com's with Waters re change in occupancy or use and implications of same under the CBC	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/29/2021	Guy Wallace	0.9	\$1,350	\$1,215	legal research and analysis re change in use or occupancy and whether same constitutes an alteration under the CBC	Misc. Research
11/29/2021	Mark Johnson	0.9	\$1,150	\$1,035	call w/ GBW re case schedule, D's responses to 6th set of document request. planning for discovery conference, identification of remaining discovery projects and assignment of same.	Case Organization, Planning and Strategy
11/29/2021	Mark Johnson	2.5	\$1,150	\$2,875	further depo prep session with Doug Cross for day 2 of his deposition	Depositions
11/29/2021	Mark Johnson	1.0	\$1,150	\$1,150	review docs for prep session w/ D Cross for day 2 of deposition.	Depositions
11/29/2021	Mark Johnson	0.2	\$1,150	\$230	emails to OC re need to meet and confer re responses to set six of document requests and date for production of documents ordered by MJ Beeler.	Discovery (Non-Deposition)
11/29/2021	Mark Johnson	0.3	\$1,150	\$345	review and analyze D responses to RPD set 6, emails w/ COC re same.	Discovery (Non-Deposition)
11/29/2021	Mark Johnson	1.0	\$1,150	\$1,150	call w / corporate expert Saul Solomon and GCG and AX re scope of case and potential expert assignment, facts, engagement letter	Experts (Including Retention)
11/29/2021	Mark Johnson	0.1	\$1,150	\$115	email exchange /w JM re depo prep and depo	Experts (Including Retention)
11/29/2021	Travis Close	0.3	\$850	\$255	Call with MTJ re: prep for tomorrow's deposition with doug cross	Case Organization, Planning and Strategy
11/29/2021	Travis Close	0.3	\$850	\$255	Email to MTJ re: brookdale's maintainance of corporate-wide fleet spreadsheet	Case Organization, Planning and Strategy
11/29/2021	Travis Close	0.3	\$850	\$255	Prep for meeting with architectural experts re: draft reports (review lastest evidence received from building departments and updated records spreadsheet)	Case Organization, Planning and Strategy
11/29/2021	Travis Close	1.2	\$850	\$1,020	Analyze updates to Brookdale's CDL/Fleet safety policy over time (Cross depo prep)	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/29/2021	Travis Close	1.4	\$850	\$1,190	Review and analyze documents related to Brookdale's JJ Keller system for CDL/Fleet/Driver recordkeeping (Cross depo prep)	Discovery (Non-Deposition)
11/29/2021	Travis Close	0.9	\$850	\$765	Review and analyze docs related to compliance with BEST audits for transportation policy (Cross depo prep)	Discovery (Non-Deposition)
11/29/2021	Travis Close	1.2	\$850	\$1,020	Analyze additional evidence for date of construction received for Brookdale Magnolia	Discovery (Non-Deposition)
11/29/2021	Travis Close	0.4	\$850	\$340	Review and analyze Brookdale's responses to sixth set of doc requests	Discovery (Non-Deposition)
11/29/2021	Travis Close	0.4	\$850	\$340	Analyze additional evidence for date of construction received for Villa de anza facility	Discovery (Non-Deposition)
11/29/2021	Travis Close	0.8	\$850	\$680	Call with GBW, architectural experts re: draft reports and construction history	Experts (Including Retention)
11/30/2021	Guy Wallace	4.4	\$1,350	\$5,940	conf with Waters re preparation for deposition	Depositions
11/30/2021	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re Cross deposition; Waters deposition	Depositions
11/30/2021	Guy Wallace	0.6	\$1,350	\$810	com's with Maatman; GG; MTJ re submission to MJ Beeler re case schedule; revise and edit same	Discovery (Non-Deposition)
11/30/2021	Guy Wallace	1.6	\$1,350	\$2,160	preparation for defense of deposition of Waters; review and analysis of facility reports	Experts (Including Retention)
11/30/2021	Mark Johnson	0.6	\$1,150	\$690	calls w/ GBW (x3) re dispute with OC re form of statement for submission to court re case schedule	Case Organization, Planning and Strategy
11/30/2021	Mark Johnson	2.3	\$1,150	\$2,645	defend day 2 of depo of expert Douglas Cross	Depositions
11/30/2021	Mark Johnson	0.5	\$1,150	\$575	coms w/ D Cross before and after depo for prep and debriefing	Depositions
11/30/2021	Mark Johnson	0.8	\$1,150	\$920	search document database and review documents related to BSL standards for depo prep for Flores	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/30/2021	Mark Johnson	1.0	\$1,150	\$1,150	further review of docs related to Cross depo and potential examination	Depositions
11/30/2021	Mark Johnson	1.4	\$1,150	\$1,610	work on draft objections to Plaintiff depo notices	Depositions
11/30/2021	Mark Johnson	0.1	\$1,150	\$115	email exchange w/ OC re meeting and conferring on responses to Ps' sixth set of document requests.	Discovery (Non-Deposition)
11/30/2021	Mark Johnson	0.1	\$1,150	\$115	email exchange w/ OC re meeting and conferring on responses to Ps' sixth set of document requests.	Discovery (Non-Deposition)
11/30/2021	Mark Johnson	0.2	\$1,150	\$230	email exchange w/ OC re missing assessment and other data	Discovery (Non-Deposition)
11/30/2021	Mark Johnson	0.2	\$1,150	\$230	email exchange w/ COC re position on competing statements re case schedule and reasons for opposing expansive statement	Discovery (Non-Deposition)
11/30/2021	Mark Johnson	0.3	\$1,150	\$345	review email from OC GLM re meeting and conferring on rpd set 6 and draft response to same.	Discovery (Non-Deposition)
11/30/2021	Mark Johnson	0.3	\$1,150	\$345	re-work draft submission to court re case schedule to include certain items proposed by Ds and re-configure	Discovery (Non-Deposition)
11/30/2021	Travis Close	0.3	\$850	\$255	Email to MTJ re: prior communications on resident plaintiff files requests	Case Organization, Planning and Strategy
11/30/2021	Travis Close	0.5	\$850	\$425	Final prep for deposition of douglas cross, part II	Depositions
11/30/2021	Travis Close	0.3	\$850	\$255	Meet with EPO re: recent construction history docs received	Discovery (Non-Deposition)
11/30/2021	Travis Close	0.2	\$850	\$170	Meet with EPO re: doc review assignment -- locating Brookdale's fleet spreadsheets	Discovery (Non-Deposition)
11/30/2021	Travis Close	0.5	\$850	\$425	Analyze prior communications between parties on issue of updated production of plaintiffs' resident files	Discovery (Non-Deposition)
11/30/2021	Travis Close	1.3	\$850	\$1,105	Fire drills analysis -- QA on sample selection; analyze and correct for included years; replace drills with insufficient information	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/30/2021	Travis Close	0.8	\$850	\$680	Review and analyze communications and documents from Howard Cartwright (mentioned in today's Cross deposition)	Discovery (Non-Deposition)
11/30/2021	Travis Close	0.2	\$850	\$170	Review and analyze statement by parties re: current case schedule	Discovery (Non-Deposition)
11/30/2021	Travis Close	0.8	\$850	\$680	Additional fire drills sampling analysis -- equalize by year (2015-2020)	Discovery (Non-Deposition)
12/1/2021	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ re preparation for hearing with MJ Beeler re discovery	Discovery (Non-Deposition)
12/1/2021	Guy Wallace	1.3	\$1,350	\$1,755	prepare for and participate in team call re discovery; named P's depositions; preparation for hearing with MJ Beeler on 12/1/21	Discovery (Non-Deposition)
12/1/2021	Mark Johnson	1.2	\$1,150	\$1,380	regular team mtg: re position on P depositions and resident files, strategy for discovery conference with the Court, tasks allocation and status	Case Organization, Planning and Strategy
12/1/2021	Mark Johnson	0.5	\$1,150	\$575	call w/ gbw re position on p depos and production of resident files, strategy for discvoery conference, topics for team mtg	Case Organization, Planning and Strategy
12/1/2021	Mark Johnson	0.8	\$1,150	\$920	call w/ GBW re D ability to identify caregiver staff and arguments re burden, construction history for access expert depos, Plaintiff depositions and resident files, strategy for discovery conference and response to D email re files and plaintiff depos	Case Organization, Planning and Strategy
12/1/2021	Mark Johnson	1.8	\$1,150	\$2,070	review depo transcripts for testimony re clincial services depart per request from coc for depo prep for Flores	Depositions
12/1/2021	Mark Johnson	1.5	\$1,150	\$1,725	revise, finalize and serve objections to 3 notices of depos of Plaintiffs; com w/ LEC re POS re same	Discovery (Non-Deposition)
12/1/2021	Travis Close	0.2	\$850	\$170	Email to AXU re: 10-ks showing Brookdale subsidiaries	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/1/2021	Travis Close	1.2	\$850	\$1,020	Meeting with team and co-counsel re: tomorrow's hearing with judge beeler, outstanding discovery requests, new discovery, new plaintiff search etc.	Case Organization, Planning and Strategy
12/1/2021	Travis Close	0.3	\$850	\$255	Review and analyze index of Brookdale-related text messages by plaintiff stiner	Discovery (Non-Deposition)
12/1/2021	Travis Close	0.5	\$850	\$425	Review, analyze, revise proposed objections to notices of depositions for Stiner, Algarme and Jestrabek-Hart	Discovery (Non-Deposition)
12/1/2021	Travis Close	0.9	\$850	\$765	Search for Brookdale's policies on which job positions are able to provide direct care to residents	Discovery (Non-Deposition)
12/1/2021	Travis Close	1.0	\$850	\$850	Legal research re: whether a specific number of days' notice is required before serving objections to deposition notice, or filing notice of protective order	Discovery (Non-Deposition)
12/1/2021	Travis Close	1.1	\$850	\$935	June Kailes analysis -- analyze components of fire drills as required by statute/regulation; compare to Brookdale's fire drill form components	Experts (Including Retention)
12/2/2021	Guy Wallace	2.5	\$1,350	\$3,375	prepare for and participate in discovery hearing with MJ Beeler	Discovery (Non-Deposition)
12/2/2021	Guy Wallace	0.5	\$1,350	\$675	com's with GG; JY; MTJ re production of named P's for deposition	Discovery (Non-Deposition)
12/2/2021	Guy Wallace	0.5	\$1,350	\$675	com's with GG; MTJ re results of discovery hearing with MJ Beeler	Discovery (Non-Deposition)
12/2/2021	Guy Wallace	3.6	\$1,350	\$4,860	preparation of notes re Waters expert reports and opinions	Experts (Including Retention)
12/2/2021	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of declaration of Dr. Flores; com's with MTJ re preparation for deposition of same	Experts (Including Retention)
12/2/2021	Guy Wallace	0.4	\$1,350	\$540	com's with Waters re depo preparation	Experts (Including Retention)
12/2/2021	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ re motions to compel re class cert issues that may need to be filed in December 2021	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/2/2021	Mark Johnson	1.0	\$1,150	\$1,150	discovery conference w/ MJ Beeler (actual time appearing on our case)	Case Management Conferences
12/2/2021	Mark Johnson	0.3	\$1,150	\$345	follow up call w/ GBW and GCG re discovery conference and impact of same on discovery and motions to compel going forward	Case Management Conferences
12/2/2021	Mark Johnson	0.1	\$1,150	\$115	email w/ EO re document search for BSL standards	Case Organization, Planning and Strategy
12/2/2021	Mark Johnson	0.3	\$1,150	\$345	call w/ COC GBW, GCG, JY re position on production of plaintiffs for depositions without resident files, mtn for protective order.	Depositions
12/2/2021	Mark Johnson	0.4	\$1,150	\$460	draft email to OC in response to offer to produce plaintiff files re timing and production of Plaintiffs for deposition.	Depositions
12/2/2021	Mark Johnson	0.4	\$1,150	\$460	review email and 3 attachments for J Mastin re depo prep and construction history for facilities. draft email in response	Depositions
12/2/2021	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW re prep for Waters depo, Mastin's construction history for his depo	Depositions
12/2/2021	Mark Johnson	0.9	\$1,150	\$1,035	call w/ GBW re strategy going forward on various motions to compel and future discovery request following MJ Beeler's comments at discovery conference, status of data production and document requests for which meet and confer sessions are needed	Discovery (Non-Deposition)
12/2/2021	Mark Johnson	1.4	\$1,150	\$1,610	call w/ BU to work through issues and strategy for responding to demand for production of Aegis Exhibit 17 for Flores deposition, compliance with requirements of protective order re subpoena of non-party confidential materials and communicating with aegis counsel re same	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/2/2021	Mark Johnson	1.5	\$1,150	\$1,725	review selected S Stiner text messages for possible supplemental production; com w/ LEC re organization and printing of same	Discovery (Non-Deposition)
12/2/2021	Travis Close	0.8	\$850	\$680	Review and analyze versions of CBC to determine when contrast stair striping was first included	Case Organization, Planning and Strategy
12/2/2021	Travis Close	1.1	\$850	\$935	Fire drills analysis -- BKD0063215-BKD1802810	Discovery (Non-Deposition)
12/2/2021	Travis Close	1.2	\$850	\$1,020	Fire drills analysis -- BKD1802810-BKD1803012	Discovery (Non-Deposition)
12/2/2021	Travis Close	1.4	\$850	\$1,190	Create spreadsheet for fire drills analysis with columns for evacuation devices, other methods/mobility devices, resident participation, corrective action, and element ratings for each	Discovery (Non-Deposition)
12/2/2021	Travis Close	0.8	\$850	\$680	Draft list of vendors for conducting fire drills at BKD facilities based on 51-facility sample	Discovery (Non-Deposition)
12/2/2021	Travis Close	0.4	\$850	\$340	Review and analyze notes by June Kailes on elements of proper fire drills (for drills analysis)	Experts (Including Retention)
12/3/2021	Guy Wallace	4.6	\$1,350	\$6,210	prepare for and defend deposition of Waters	Depositions
12/3/2021	Guy Wallace	0.4	\$1,350	\$540	com's with DTM; MTJ re deposition of Flores and production of materials re same	Depositions
12/3/2021	Guy Wallace	0.6	\$1,350	\$810	com's with JY; AX; MTJ re depositions of named Plaintiffs and D's production of resident files re same	Depositions
12/3/2021	Mark Johnson	0.5	\$1,150	\$575	review and compare construction history binders for waters depo	Depositions
12/3/2021	Mark Johnson	0.1	\$1,150	\$115	call w/ S Stiner re depo	Depositions
12/3/2021	Mark Johnson	0.4	\$1,150	\$460	mtg w/ GBW and G Waters re depo examination topics	Depositions
12/3/2021	Mark Johnson	0.6	\$1,150	\$690	review and draft response to OC Jacobsen re production of resident files and deposition schedule	Depositions
12/3/2021	Mark Johnson	0.5	\$1,150	\$575	meeting w/ client re communications w/ San Ramon ED and docs rec'd, Stacy's deposition	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/3/2021	Mark Johnson	1.5	\$1,150	\$1,725	GTM call and screen share w/ DM, JT, BU re appendix 17 from Aegis, confidential material within it and approach for responding to D demand for same and addressing confidentiality issue.	Discovery (Non-Deposition)
12/3/2021	Mark Johnson	0.6	\$1,150	\$690	call w/ BU to follow up on Appendix 17 and approach to same w/ OC and Aegis counsel	Discovery (Non-Deposition)
12/3/2021	Rachel Steyer	0.6	\$750	\$450	conversation with GBW reviewing outstanding tasks and assignments for Brookdale	Case Organization, Planning and Strategy
12/3/2021	Rachel Steyer	0.7	\$750	\$525	reviewing DMS completed intakes	Class Outreach and Contact
12/3/2021	Rachel Steyer	0.2	\$750	\$150	email to DSM with feedback about intakes	Class Outreach and Contact
12/3/2021	Rachel Steyer	0.3	\$750	\$225	reviewing RVR intake	Class Outreach and Contact
12/3/2021	Rachel Steyer	0.4	\$750	\$300	reviewing RDR completed intakes	Class Outreach and Contact
12/3/2021	Rachel Steyer	0.2	\$750	\$150	email to RDR with feedback and comments concerning completed intakes	Class Outreach and Contact
12/3/2021	Rachel Steyer	0.2	\$750	\$150	reviewing notes and communications forwarded by co-counsel concerning potential declarant; searched esi production to try to locate residency agreement for further review	Discovery (Non-Deposition)
12/3/2021	Rachel Steyer	0.3	\$750	\$225	reviewing documents provided by co-counsel from named plaintiff with update concerning situation at Brookdale Scotts Valley	Discovery (Non-Deposition)
12/3/2021	Travis Close	0.2	\$850	\$170	Meet with GBW, GW re: strategy during deposition break	Case Organization, Planning and Strategy
12/3/2021	Travis Close	1.6	\$850	\$1,360	Morning prep for deposition of Gary Waters	Depositions
12/3/2021	Travis Close	0.4	\$850	\$340	Review and analyze Order Approved Stip protected order for standard litigation filed in Aegis case -- (disclosure issue for Flores Exhibit)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/3/2021	Travis Close	0.5	\$850	\$425	Review and analyze client docs (notes, complaints, letters, meeting minutes) shared by Jestrabek-Hart re: proposed price increases for 2022 at Scotts Valley facility	Discovery (Non-Deposition)
12/3/2021	Travis Close	0.2	\$850	\$170	Review and analyze memo by GCG re: yesterday's meeting with judge beeler	Discovery (Non-Deposition)
12/3/2021	Travis Close	1.3	\$850	\$1,105	Review and analyze recent "hot" documents regarding Brookdale's Service Alignment program found by JMP in previous two weeks	Discovery (Non-Deposition)
12/3/2021	Travis Close	1.5	\$850	\$1,275	Search for correspondence re: corrective action plans for brookdale facilities issued by DSS	Discovery (Non-Deposition)
12/3/2021	Travis Close	1.2	\$850	\$1,020	Fire drills analysis -- BKD1803091-BKD1803427	Discovery (Non-Deposition)
12/3/2021	Travis Close	0.9	\$850	\$765	Fire drills analysis -- BKD1803427-BKD1803766	Discovery (Non-Deposition)
12/4/2021	Guy Wallace	2.2	\$1,350	\$2,970	legal research and analysis re coverage and scope of liability under CLRA; com's with GG; JY; AX; MTJ re same (.6)	Class Certification
12/4/2021	Mark Johnson	0.7	\$1,150	\$805	call w/ GBW re analysis of CLRA provisions and UCL provisions undermining D position that they need to be owners to be liable	Case Organization, Planning and Strategy
12/4/2021	Mark Johnson	1.5	\$1,150	\$1,725	review depo transcripts for testimony re MC workers performing AL work and vice versa for Flores depo prep	Depositions
12/4/2021	Mark Johnson	0.7	\$1,150	\$805	search depo testimony for assertions by D witnesses that benchmarks / SA need not be followed, to be anticipated for Flores examnation	Depositions
12/4/2021	Mark Johnson	1.3	\$1,150	\$1,495	prep for Stiner depo - review and add to potential areas of examination and identify docs to review.	Depositions
12/4/2021	Mark Johnson	0.2	\$1,150	\$230	draft emails w/ depo excerpts to COC Marks for Flores depo prep	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/4/2021	Mark Johnson	1.8	\$1,150	\$2,070	review and identify relevant texts from client for production	Discovery (Non-Deposition)
12/4/2021	Mark Johnson	1.0	\$1,150	\$1,150	review new production of docs pertaining to Stiner (1,400 pages) for overview	Discovery (Non-Deposition)
12/4/2021	Mark Johnson	0.3	\$1,150	\$345	email exchanges w/ COC re adequacy of resident file production and position on depositions	Discovery (Non-Deposition)
12/4/2021	Mark Johnson	0.2	\$1,150	\$230	draft and send email to OC Jacobsen re adequacy of resident file production and depositions	Discovery (Non-Deposition)
12/5/2021	Mark Johnson	0.1	\$1,150	\$115	email exchange w/ DM re Flores depo and support for certain facts in depo testimony.	Depositions
12/5/2021	Mark Johnson	3.5	\$1,150	\$4,025	continue reviewing Stiner texts and identifying texts responsive to document requests for production	Discovery (Non-Deposition)
12/6/2021	Mark Johnson	0.4	\$1,150	\$460	call w/ client S Stiner re texts and planning for depo prep	Depositions
12/6/2021	Mark Johnson	0.5	\$1,150	\$575	mtg and coms w/ RAB, EO re review, redaction of client texts and supplemental production	Discovery (Non-Deposition)
12/6/2021	Mark Johnson	0.2	\$1,150	\$230	com w/ GBW re content and production of Stiner texts	Discovery (Non-Deposition)
12/6/2021	Mark Johnson	0.1	\$1,150	\$115	email exchanges w/ OC re depositions and meet and confer session.	Discovery (Non-Deposition)
12/6/2021	Mark Johnson	2.5	\$1,150	\$2,875	continue reviewing and selecting Stiner texts for production	Discovery (Non-Deposition)
12/6/2021	Mark Johnson	2.4	\$1,150	\$2,760	continue reviewing Stiner texts for production and prep for depo	Discovery (Non-Deposition)
12/6/2021	Rachel Steyer	2.3	\$750	\$1,725	drafting class member declaration	Class Certification
12/6/2021	Rachel Steyer	0.6	\$750	\$450	call with RDR and DMS to discuss declaration drafting	Class Outreach and Contact
12/6/2021	Rachel Steyer	0.2	\$750	\$150	follow up call with current resident to discuss preparing declaration	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/6/2021	Rachel Steyer	0.2	\$750	\$150	call with family member of former resident, decided not to proceed with intake on account of family member not recalling much by way of details	Class Outreach and Contact
12/6/2021	Rachel Steyer	0.3	\$750	\$225	spoke with family member of former resident, determined not a good fit for intake/declaration given memory issues	Class Outreach and Contact
12/6/2021	Rachel Steyer	0.5	\$750	\$375	call with family member of former resident, discussed case, scheduled f/u call for tomorrow	Class Outreach and Contact
12/6/2021	Rachel Steyer	0.7	\$750	\$525	conducted document review and analysis within esi production of declarant's records and documents	Discovery (Non-Deposition)
12/6/2021	Travis Close	0.2	\$850	\$170	Email to JM, MTJ re: requesting notes on facility construction histories	Case Organization, Planning and Strategy
12/6/2021	Travis Close	0.4	\$850	\$340	Review analyze by EPO re: brookdale documents with "BSL" standards	Discovery (Non-Deposition)
12/6/2021	Travis Close	0.5	\$850	\$425	Review and analyze new records produced by city of San Diego for 5119 claremont mesa blvd	Discovery (Non-Deposition)
12/6/2021	Travis Close	0.4	\$850	\$340	Review and analyze new records produced by city of San Diego for 1301 Hartfield Ave	Discovery (Non-Deposition)
12/6/2021	Travis Close	0.3	\$850	\$255	Review and analyze sufficiency of construction history evidence for Riverwalk facility	Discovery (Non-Deposition)
12/6/2021	Travis Close	0.5	\$850	\$425	Create timeline of construction history documents for brookdale magnolia	Discovery (Non-Deposition)
12/7/2021	Guy Wallace	0.5	\$1,350	\$675	review and analysis of materials re named plaintiff depo prep	Depositions
12/7/2021	Guy Wallace	0.2	\$1,350	\$270	com's with Launey; Waters re second day of deposition	Experts (Including Retention)
12/7/2021	Mark Johnson	1.3	\$1,150	\$1,495	final review and selection of S Stiner texts for potential production	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/7/2021	Mark Johnson	0.3	\$1,150	\$345	mtg w/ RAB and EO about review, redaction and production of Stiner texts; com w/ LEC re production of documens from R Stiner	Discovery (Non-Deposition)
12/7/2021	Mark Johnson	1.0	\$1,150	\$1,150	review RPD set 6 and prepare notes for meet and confer session on 10-18; com w/ GBW re same, send invitation to OC	Discovery (Non-Deposition)
12/7/2021	Rachel Steyer	1.0	\$750	\$750	drafting, revising, and completing class member declaration	Class Certification
12/7/2021	Rachel Steyer	0.5	\$750	\$375	follow up call with family member of current resident, to continue partial intake, scheduled ongoing follow up call	Class Outreach and Contact
12/7/2021	Rachel Steyer	0.2	\$750	\$150	call with family member of former resident, not a good fit for intake/declaration given husband's temporary stay	Class Outreach and Contact
12/7/2021	Rachel Steyer	0.2	\$750	\$150	updating and reviewing intake and declaration worksheet for reply to reflect updated status of declaration drafting	Class Outreach and Contact
12/7/2021	Rachel Steyer	3.0	\$750	\$2,250	updating and revising plaintiffs' supplemental initial disclosures	Discovery (Non-Deposition)
12/7/2021	Rachel Steyer	0.2	\$750	\$150	email to GBW with question about designating witnesses in supplemental initial disclosures	Discovery (Non-Deposition)
12/7/2021	Travis Close	1.1	\$850	\$935	Review and analyze rough transcript re: depo of Cristina Flores	Depositions
12/7/2021	Travis Close	2.2	\$850	\$1,870	Revisions and additions to Jeff Mastin Binder based on input/notes from jeff (depo prep)	Depositions
12/7/2021	Travis Close	0.2	\$850	\$170	Email to JM re: revisions to binder of construction history	Depositions
12/7/2021	Travis Close	0.3	\$850	\$255	Review and analyze notes from JY re: depo prep with bernie jestrabek-hart and jeanette algarne	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/7/2021	Travis Close	1.4	\$850	\$1,190	Add column to fire drill analysis for "Procedures for low vision residents" and re-review fire drills analyzed thus far to update chart	Discovery (Non-Deposition)
12/7/2021	Travis Close	1.1	\$850	\$935	Fire drill analysis -- # BKD1803812 - BKD1804171	Discovery (Non-Deposition)
12/7/2021	Travis Close	1.2	\$850	\$1,020	Fire drill analysis -- # BKD1804171-BKD1804615	Discovery (Non-Deposition)
12/7/2021	Travis Close	0.9	\$850	\$765	Legal research re: whether certificate of occupancy is sufficient to establish applicable date under CBC where original building permit application is missing	Discovery (Non-Deposition)
12/8/2021	Guy Wallace	1.9	\$1,350	\$2,565	preparation of potential questions re deposition of named P's; com's with JY re same	Depositions
12/8/2021	Guy Wallace	0.7	\$1,350	\$945	preparation of draft stipulation re continuation of depo of Waters; com's with Launey re same	Depositions
12/8/2021	Guy Wallace	0.9	\$1,350	\$1,215	preparation of notes and authorities for MTJ re meet and confer with D's re alterations documents	Discovery (Non-Deposition)
12/8/2021	Mark Johnson	4.5	\$1,150	\$5,175	depo prep session w/ client Stacy Stiner	Depositions
12/8/2021	Mark Johnson	1.4	\$1,150	\$1,610	discuss depo prep w/ S Stiner during commute to and from office and residence	Depositions
12/8/2021	Mark Johnson	0.3	\$1,150	\$345	coms (calls and emails) w/ RAB and LEC re documents to be part of supplemental production and downloading new production.	Discovery (Non-Deposition)
12/8/2021	Mark Johnson	1.7	\$1,150	\$1,955	review and make final selection of texts for production from subset of pdfs provided by RAB; email RAB re same	Discovery (Non-Deposition)
12/8/2021	Mark Johnson	0.1	\$1,150	\$115	email RAB re supplemental document production.	Discovery (Non-Deposition)
12/8/2021	Rachel Steyer	0.9	\$750	\$675	editing and revising RVR draft declaration	Class Certification
12/8/2021	Rachel Steyer	0.3	\$750	\$225	received call back from family member of former residents, scheduled intake call	Class Outreach and Contact
12/8/2021	Rachel Steyer	0.4	\$750	\$300	communications on teams with RVR, AXW, PXM, RDR, DSM concerning outreach questions and efforts	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/8/2021	Rachel Steyer	0.6	\$750	\$450	reviewing and organizing documents from esi production corresponding to likely declarant	Discovery (Non-Deposition)
12/8/2021	Rachel Steyer	2.9	\$750	\$2,175	drafting and revising supplemental initial disclosures	Discovery (Non-Deposition)
12/8/2021	Travis Close	0.2	\$850	\$170	Email to JT (staffing expert) re: floor plans for mirage inn and rancho mirage facilities	Case Organization, Planning and Strategy
12/8/2021	Travis Close	0.2	\$850	\$170	Call from LEC re: preparation for stiner deposition	Case Organization, Planning and Strategy
12/8/2021	Travis Close	3.6	\$850	\$3,060	Deposition prep with plaintiff Stacia Stiner and MTJ (part i)	Case Organization, Planning and Strategy
12/8/2021	Travis Close	0.7	\$850	\$595	Legal research re: history of CBC and effective dates	Case Organization, Planning and Strategy
12/8/2021	Travis Close	0.3	\$850	\$255	email to architectural experts re: question about history of CBC and effective dates	Case Organization, Planning and Strategy
12/8/2021	Travis Close	0.8	\$850	\$680	Analyze floor plans, satellite data, and DSS records for Rancho Mirage & Mirage Inn facilities to resolve discrepancies in floor plans for staffing analysis	Class Certification
12/8/2021	Travis Close	0.6	\$850	\$510	Final revisions to Doug Cross depo transcript errata sheet	Depositions
12/8/2021	Travis Close	0.2	\$850	\$170	Meet with LEC re: discovery requests/responses needed for Stiner deposition	Depositions
12/8/2021	Travis Close	1.8	\$850	\$1,530	Compare recent determinations in Jeff Mastin Binder (for depo prep) as to which versions of CBC apply to Mastin declaration iso class cert	Experts (Including Retention)
12/9/2021	Guy Wallace	1.1	\$1,350	\$1,485	preparation of potential topics, questions re depositions of named P's; preparation for Algarne; Stiner depositions	Depositions
12/9/2021	Guy Wallace	1.6	\$1,350	\$2,160	prepare for and participate in depo preparation for Algarne	Depositions
12/9/2021	Mark Johnson	3.3	\$1,150	\$3,795	depo prep in the office with client Stacy Stiner	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/9/2021	Mark Johnson	0.2	\$1,150	\$230	mtg w/ TCC re status and results of review of Mastin materials and prep for Mastin deposition.	Depositions
12/9/2021	Mark Johnson	0.4	\$1,150	\$460	calls and mtg w/ RAB re supplemental document production including texts	Discovery (Non-Deposition)
12/9/2021	Rachel Steyer	0.3	\$750	\$225	call with RDR to discuss specific questions in intake form	Class Outreach and Contact
12/9/2021	Rachel Steyer	0.3	\$750	\$225	attended weekly outreach meeting to discuss and review brookdale outreach efforts	Class Outreach and Contact
12/9/2021	Rachel Steyer	0.3	\$750	\$225	communications with DMS, RVR, ASW, PXM, RDR on teams concerning brookdale outreach efforts	Class Outreach and Contact
12/9/2021	Rachel Steyer	0.7	\$750	\$525	gathering, organizing and reviewing additional documents in esi production corresponding to likely declarant	Discovery (Non-Deposition)
12/9/2021	Rachel Steyer	0.3	\$750	\$225	reviewing esi production for documents corresponding to likely declarant	Discovery (Non-Deposition)
12/9/2021	Rachel Steyer	5.2	\$750	\$3,900	drafting and updating supplemental initial disclosures, updating witnesses and documents lists	Discovery (Non-Deposition)
12/9/2021	Travis Close	2.2	\$850	\$1,870	Continue analysis of mastin standards articulated in binder (depo prep) from recent docs vs. in declaration; create chart comparing same	Class Certification
12/9/2021	Travis Close	0.7	\$850	\$595	Email to MTJ re analysis of mastin standards articulated in binder (depo prep) from recent docs vs. in declaration & checking conclusions drawn from evidence	Class Certification
12/9/2021	Travis Close	1.2	\$850	\$1,020	M/C call with Defendants -- RFP set 6	Communications With Opposing Counsel
12/9/2021	Travis Close	0.1	\$850	\$85	Review and analyze stip re: gary waters deposition	Depositions
12/9/2021	Travis Close	0.3	\$850	\$255	Email to LEC re: depo transcript and errata for june kailes requested	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/9/2021	Travis Close	0.5	\$850	\$425	Meet with MTJ re: planning for preparation of jeff mastin deposition	Depositions
12/9/2021	Travis Close	0.3	\$850	\$255	Meet with MTJ re: issues found with applications of building standards in Mastin declaration (Depo prep)	Depositions
12/9/2021	Travis Close	0.3	\$850	\$255	Analyze property records from City of Corona online database for Brookdale corona	Discovery (Non-Deposition)
12/9/2021	Travis Close	1.1	\$850	\$935	Analyze sample of fire drills # BKD1804706-BKD1805953	Discovery (Non-Deposition)
12/10/2021	Guy Wallace	1.4	\$1,350	\$1,890	prepare for and participate in depo prep with Jestrabek-Hart	Depositions
12/10/2021	Mark Johnson	3.0	\$1,150	\$3,450	defend deposition of Stacia Stiner, session I	Depositions
12/10/2021	Mark Johnson	1.5	\$1,150	\$1,725	conferences during breaks in Stiner depo, set up, technical issues	Depositions
12/10/2021	Mark Johnson	0.2	\$1,150	\$230	call w/ Rita Stiner re Stacy's deposition; her communications with San Ramon ED	Depositions
12/10/2021	Mark Johnson	0.9	\$1,150	\$1,035	review depo issue w/ client S Stiner en route from San Ramon to office for depo	Depositions
12/10/2021	Mark Johnson	0.4	\$1,150	\$460	review summary of Algarme depo from COC Yellin and draft summary of S Stiner depo for team	Depositions
12/10/2021	Mark Johnson	0.2	\$1,150	\$230	coms w/ TCC re Mastin depo prep and documents; review emails re same	Depositions
12/10/2021	Rachel Steyer	0.3	\$750	\$225	editing and reviewing DMS draft declaration	Class Certification
12/10/2021	Rachel Steyer	0.8	\$750	\$600	call with DMS to discuss edits to draft declaration	Class Certification
12/10/2021	Rachel Steyer	0.3	\$750	\$225	received call back from family member, discussed case, scheduled intake	Class Outreach and Contact
12/10/2021	Rachel Steyer	5.5	\$750	\$4,125	drafting and revising supplemental initial disclosures, adding additional witnesses and documents	Discovery (Non-Deposition)
12/10/2021	Travis Close	0.6	\$850	\$510	Final depo prep with stacia stiner / meet with MTJ	Depositions
12/10/2021	Travis Close	1.1	\$850	\$935	Review and analyze text messages from stiner in prep for today's depo	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/10/2021	Travis Close	0.4	\$850	\$340	Meet with SLG re: strategy for upcoming depo of jeff mastin	Depositions
12/10/2021	Travis Close	0.3	\$850	\$255	Emails to JM re: scheduling depo prep sessions for next week	Depositions
12/10/2021	Travis Close	0.4	\$850	\$340	Meet with MTJ re: planning for depo prep of jeff mastin	Depositions
12/10/2021	Travis Close	1.2	\$850	\$1,020	Fire Drill analysis # BKD1805969-BKD1806604	Discovery (Non-Deposition)
12/10/2021	Travis Close	1.2	\$850	\$1,020	Fire Drill analysis # BKD1806604-BKD1807248	Discovery (Non-Deposition)
12/10/2021	Travis Close	1.0	\$850	\$850	Fire Drill analysis # BKD1807248-BKD1807677	Discovery (Non-Deposition)
12/11/2021	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ; JY; AX re Stiner; Jestrabek-Hart; Algarne re deposition preparation, testimony to date	Depositions
12/12/2021	Guy Wallace	3.2	\$1,350	\$4,320	preparation of potential topics and questions re deposition of Dr. Kennedy; analysis of potential Daubert arguments re Dr. Kennedy's declaration re class certification; legal research and analysis re same	Depositions
12/12/2021	Guy Wallace	2.2	\$1,350	\$2,970	com's with Mastin; MTJ re preparation for deposition of Mastin	Depositions
12/12/2021	Guy Wallace	1.5	\$1,350	\$2,025	review and analysis of declaration of Dr. Kennedy re class certification; preparation of potential topics and questions	Depositions
12/12/2021	Guy Wallace	1.3	\$1,350	\$1,755	legal research and analysis re language of California Government Code section 4450 and Health and Safety Code section 19955, and applicability of ANSI 1961 during period from 1968 to 1981/82	Misc. Research

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/12/2021	Mark Johnson	3.5	\$1,150	\$4,025	depo prep video conference w/ J Mastin	Depositions
12/12/2021	Mark Johnson	0.2	\$1,150	\$230	follow up call w/ GBW re depo prep session with Mastin	Depositions
12/12/2021	Mark Johnson	0.3	\$1,150	\$345	review Jeff Mastin mark up to declaration, GBW comments on same and exhibits from JM	Depositions
12/13/2021	Guy Wallace	2.6	\$1,350	\$3,510	preparation for deposition of Dr. Kennedy; com's with PK; LP; MTJ; RLS re same	Depositions
12/13/2021	Mark Johnson	1.4	\$1,150	\$1,610	research public accommodation and "open to the public" analysis	Class Certification
12/13/2021	Mark Johnson	4.2	\$1,150	\$4,830	video conference w/ expert J Mastin - depo prep	Depositions
12/13/2021	Mark Johnson	0.5	\$1,150	\$575	calls (x2) w/ GBW re issues on depo prep for Mastin; filing of Errata for declaration and 3 reports	Depositions
12/13/2021	Rachel Steyer	0.3	\$750	\$225	editing and reviewing DMS draft declaration	Class Certification
12/13/2021	Rachel Steyer	0.2	\$750	\$150	email to DMS with feedback on draft declaration	Class Certification
12/13/2021	Rachel Steyer	0.9	\$750	\$675	reviewing and gathering documents from ESI production for likely declarants	Discovery (Non-Deposition)
12/13/2021	Rachel Steyer	3.7	\$750	\$2,775	editing and revising supplemental initial disclosures, updating documents and witness lists	Discovery (Non-Deposition)
12/13/2021	Travis Close	0.3	\$850	\$255	Meet with MTJ re: field notes to send to def's counsel from jeff mastin	Case Organization, Planning and Strategy
12/13/2021	Travis Close	0.8	\$850	\$680	Legal research re: ch 261 from CBC requiring application of standards to municipalities	Class Certification
12/13/2021	Travis Close	0.2	\$850	\$170	Email to Def's counsel re: binder of construction history for tomorrow's deposition	Communications With Opposing Counsel
12/13/2021	Travis Close	0.4	\$850	\$340	Meet with MTJ re: prep for deposition of Jeff Mastin	Depositions
12/13/2021	Travis Close	4.0	\$850	\$3,400	Prep with JM, MTJ for deposition of Jeff Mastin -- Part II	Depositions
12/13/2021	Travis Close	0.5	\$850	\$425	Final review of Mastin binder -- Verify records in construction history binder are accurate	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/13/2021	Travis Close	0.5	\$850	\$425	Review and analyze list of 40 questions from GBW for jeff mastin in prep for his deposition	Depositions
12/13/2021	Travis Close	0.2	\$850	\$170	Email to MTJ re: CASp license for jeff mastin	Depositions
12/13/2021	Travis Close	0.2	\$850	\$170	Lookup CASp license for Jeff Mastin & expiration date	Depositions
12/13/2021	Travis Close	0.7	\$850	\$595	Review and analyze field notes send by JM in prep for deposition (to be produced to Ds)	Discovery (Non-Deposition)
12/14/2021	Guy Wallace	5.1	\$1,350	\$6,885	prepare for and defend deposition of Dr. Kennedy	Depositions
12/14/2021	Guy Wallace	0.4	\$1,350	\$540	com's with RLS re Kennedy depo	Depositions
12/14/2021	Guy Wallace	0.3	\$1,350	\$405	com's with Dr. Kennedy re deposition and further discovery	Experts (Including Retention)
12/14/2021	Mark Johnson	7.0	\$1,150	\$8,050	defend remote deposition of expert Jeff Mastin - time on the record	Depositions
12/14/2021	Mark Johnson	0.8	\$1,150	\$920	confer by telephone w/ J Mastin before depo and during breaks re potential examination and testimony	Depositions
12/14/2021	Mark Johnson	0.3	\$1,150	\$345	confer w/ TCC re Mastin depo testimony and potential follow up	Depositions
12/14/2021	Rachel Steyer	0.8	\$750	\$600	editing and revising DMS draft declaration	Class Certification
12/14/2021	Rachel Steyer	0.3	\$750	\$225	call with GBW to debrief following depo of expert witness	Class Outreach and Contact
12/14/2021	Rachel Steyer	0.3	\$750	\$225	communications on teams with AXW, SLS, PXM concerning outreach questiosn	Class Outreach and Contact
12/14/2021	Rachel Steyer	0.2	\$750	\$150	adding additional questions to intake script concerning negotiating residency agreement	Class Outreach and Contact
12/14/2021	Rachel Steyer	0.2	\$750	\$150	sending GBW exhibit as requested, additional information following up from phone call	Depositions
12/14/2021	Rachel Steyer	1.7	\$750	\$1,275	drafting and updating supplemental initial disclosures, identifying witnesses and documents	Discovery (Non-Deposition)
12/14/2021	Travis Close	0.4	\$850	\$340	Analyze brookdale's 2020 10-k for revenues relating to provision of health care services	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/14/2021	Travis Close	0.3	\$850	\$255	Final prep before jeff mastin deposition	Depositions
12/14/2021	Travis Close	0.2	\$850	\$170	Review and analyze notes by AX re: depo of bernie jestrabek-hart	Depositions
12/15/2021	Mark Johnson	2.0	\$1,150	\$2,300	review transcript of session 1 and other docs for prep for session II of Stiner depo	Depositions
12/15/2021	Mark Johnson	1.7	\$1,150	\$1,955	prepare draft objections and response to D's second set of rogs to Schmidt; review prior discovery and depo exhibits, notes for same	Discovery (Non-Deposition)
12/15/2021	Mark Johnson	0.7	\$1,150	\$805	draft emails (x3) to OC re production of docs ordered by 11/22 order, follow up meet and confer re responses to set six of document production and follow up on deficient data	Discovery (Non-Deposition)
12/15/2021	Mark Johnson	2.0	\$1,150	\$2,300	review mark-up of list of categories of docs requested by corporate structure expert; revise same for each category; research associated with same	Experts (Including Retention)
12/15/2021	Rachel Steyer	0.2	\$750	\$150	email to GBW concerning new questions in outreach script	Class Outreach and Contact
12/15/2021	Rachel Steyer	0.4	\$750	\$300	call with DMS to discuss declaration drafts	Class Outreach and Contact
12/15/2021	Rachel Steyer	0.4	\$750	\$300	reviewing SLS completed intake	Class Outreach and Contact
12/15/2021	Rachel Steyer	0.8	\$750	\$600	reviewing intake with SLS, discussing declaration drafting	Class Outreach and Contact
12/15/2021	Rachel Steyer	0.2	\$750	\$150	reviewing documents in ESI production for possible intake/declarant for PXM	Discovery (Non-Deposition)
12/15/2021	Rachel Steyer	3.8	\$750	\$2,850	editing and revising supplemental initial disclosures, identifying additional witnesses and documents	Discovery (Non-Deposition)
12/15/2021	Travis Close	0.5	\$850	\$425	Review and analyze latest updates in related access case (Disabled Action v. City of New York) re: accessible police stations	Case Organization, Planning and Strategy
12/15/2021	Travis Close	0.4	\$850	\$340	Meet with RLS re: debrief after Kennedy deposition	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/15/2021	Travis Close	2.2	\$850	\$1,870	Review and analyze depo of stacia stiner (Part I) for opportunities for followup testimony, corrections to confusing testimony, & errors in the records	Depositions
12/15/2021	Travis Close	1.3	\$850	\$1,105	Stiner depo prep (part ii) -- review and analyze care profiles, care assessments, and/or personal service assessments from Brookdale San Ramon	Depositions
12/15/2021	Travis Close	0.7	\$850	\$595	Analyze testimony from Kevin Bowman depo re: discretion of Brookdale facilities to deviate from policies re: transportation of residents in wheelchairs	Depositions
12/15/2021	Travis Close	0.7	\$850	\$595	Review and analyze updated DSS complaint investigation & facility evaluation reports for North Fremont, Diablo Lodge, Riverwalk, Monrovia, Napa, Garden Grove, and Auburn facilities	Discovery (Non-Deposition)
12/15/2021	Travis Close	1.4	\$850	\$1,190	Review and analyze docs under custodian Michael Johnson re: discretion of facilities to deviate from policies re: sitting on vehicles during transportation	Discovery (Non-Deposition)
12/16/2021	Guy Wallace	0.8	\$1,350	\$1,080	com's with RLS re supplemental Initial Disclosures and preparation of same	Discovery (Non-Deposition)
12/16/2021	Mark Johnson	2.5	\$1,150	\$2,875	mtg w/ client Stacy Stiner to prepare for day 2 of depo	Depositions
12/16/2021	Mark Johnson	1.0	\$1,150	\$1,150	call w/ AX, GCG, Quynh Tran re docs needed for corporate structure and identity analysis	Experts (Including Retention)
12/16/2021	Mark Johnson	1.5	\$1,150	\$1,725	research for docs and work product to provide to expert on corporate identity; draft explanatory cover emails to COC re same	Experts (Including Retention)
12/16/2021	Rachel Steyer	0.5	\$750	\$375	reviewing RVR intake with potential declarant	Class Outreach and Contact
12/16/2021	Rachel Steyer	0.5	\$750	\$375	call with GBW to review questions about supplemental initial disclosures	Discovery (Non-Deposition)
12/16/2021	Rachel Steyer	0.3	\$750	\$225	reviewing esi production for documents corresponding to possible declarant	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/16/2021	Rachel Steyer	5.5	\$750	\$4,125	editing and organizing supplemental initial disclosures, reviewing documents, adding witnesses	Discovery (Non-Deposition)
12/16/2021	Travis Close	1.2	\$850	\$1,020	Review and analyze depo transcript of dale schroyer	Depositions
12/16/2021	Travis Close	0.8	\$850	\$680	Legal research re DOJ regulations implementing ADA for reference to emergency planning (Kailes depo review)	Depositions
12/16/2021	Travis Close	2.8	\$850	\$2,380	Analyze deposition transcript of June Kailes for accuracy/completion; make suggestions for errata	Depositions
12/16/2021	Travis Close	1.3	\$850	\$1,105	Review testimony of kevin bowman from 30(b)(6) depositions re: the maintenance manual, as well as related policies, procedures and practices re: facility maintenance	Depositions
12/16/2021	Travis Close	0.7	\$850	\$595	Followup tasks to 12-9-21 M/C with defendants -- review and analyze Brookdale's productions for examples of caregiver logs	Discovery (Non-Deposition)
12/16/2021	Travis Close	1.1	\$850	\$935	Legal research re: requirements for maintenance of records for who is qualified to provide direct care to residents	Discovery (Non-Deposition)
12/16/2021	Travis Close	0.3	\$850	\$255	Review and analyze draft responses to ROGs, Set 2 for ralph schmidt	Discovery (Non-Deposition)
12/17/2021	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re Stiner deposition and D's non-responsiveness re 11/22 Order from MJ Beeler and further discovery issues	Discovery (Non-Deposition)
12/17/2021	Mark Johnson	4.0	\$1,150	\$4,600	defend depo of Stacia Stiner day 2	Depositions
12/17/2021	Mark Johnson	1.5	\$1,150	\$1,725	conferences w/ client S Stiner during breaks in depo	Depositions
12/17/2021	Mark Johnson	0.1	\$1,150	\$115	coms w/ TS and TCC re formatting, finalization and service of response to 2nd set of rogs to Plaintiff Schmidt.	Discovery (Non-Deposition)
12/17/2021	Rachel Steyer	0.2	\$750	\$150	call with DMS to discuss possible declarants	Class Outreach and Contact
12/17/2021	Rachel Steyer	0.4	\$750	\$300	reviewing and evaluating intake completed by SLS	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/17/2021	Rachel Steyer	6.3	\$750	\$4,725	editing and drafting supplemental initial disclosures, organazing and identigying witnesses and documents	Discovery (Non-Deposition)
12/17/2021	Travis Close	0.2	\$850	\$170	Email to MTJ, TBS re: additional edits to the ROGs responses to P Schmidt	Case Organization, Planning and Strategy
12/17/2021	Travis Close	0.3	\$850	\$255	Meet with MTJ re: progress of Stiner deposition	Depositions
12/17/2021	Travis Close	0.2	\$850	\$170	Email to MTJ re: resident handbook (Stiner depo exhibit)	Depositions
12/17/2021	Travis Close	0.3	\$850	\$255	Email to team re: proposition for receiving depo-related information from defendants	Depositions
12/17/2021	Travis Close	1.1	\$850	\$935	Review and analyze depo transcript of Gary Waters for testimony re: daubert challenges	Depositions
12/17/2021	Travis Close	0.3	\$850	\$255	Meet with MTJ re: findings from review of Gary Waters depo transcript	Depositions
12/17/2021	Travis Close	0.2	\$850	\$170	Email to MTJ re: revisions to answers to ROG requests from ralph schmidt	Discovery (Non-Deposition)
12/17/2021	Travis Close	1.3	\$850	\$1,105	Revisions to Answers to Def's Requests for Interrogatories for P Ralph Schmidt	Discovery (Non-Deposition)
12/17/2021	Travis Close	1.3	\$850	\$1,105	Analyze resident council meeting minutes from Brookdale San Ramon for info re: complaints to Corporate offices (Stacia Stiner depo prep -- Part II)	Discovery (Non-Deposition)
12/17/2021	Travis Close	1.2	\$850	\$1,020	Final revisions to Answers to ROGs for Ralph Schmidt, set two; send over to defendants' counsel	Discovery (Non-Deposition)
12/20/2021	Guy Wallace	1.7	\$1,350	\$2,295	com's with Waters; MTJ; RLS; TBS re deposition preparation	Depositions
12/20/2021	Mark Johnson	0.9	\$1,150	\$1,035	call w/ GBW and GW re anticipated examination and prep for same in day two of expert depo, experience from Mastin depo	Depositions
12/20/2021	Mark Johnson	0.1	\$1,150	\$115	emails w/ GBW and LEC re Mastin depo transcript	Depositions
12/20/2021	Mark Johnson	0.1	\$1,150	\$115	email exchange w/ RLS re production of class list and meet and confer w/ Ds re same	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/20/2021	Mark Johnson	0.1	\$1,150	\$115	com w/ Edgar O. re research project and charting info on corp subsidiaries of Brookdale.	Discovery (Non-Deposition)
12/20/2021	Mark Johnson	0.1	\$1,150	\$115	email exchanges w/ OC re scheduling meet and confer	Discovery (Non-Deposition)
12/20/2021	Rachel Steyer	0.2	\$750	\$150	communications with TRB, DMS, SLS on teams concerning outreach efforts	Class Outreach and Contact
12/20/2021	Rachel Steyer	0.3	\$750	\$225	reviewing ECF order to identify production deadline, email to RAB, GBW, MTJ, TCC reminding of pending discovery	Discovery (Non-Deposition)
12/20/2021	Rachel Steyer	0.2	\$750	\$150	email to co-counsel with updated supplemental initial disclosures to review	Discovery (Non-Deposition)
12/20/2021	Rachel Steyer	0.2	\$750	\$150	call with co-counsel to discuss and review supplemental initial disclosures	Discovery (Non-Deposition)
12/20/2021	Travis Close	0.3	\$850	\$255	Review and analyze draft list of brookdale licensees for assignment by EPO	Discovery (Non-Deposition)
12/20/2021	Travis Close	1.4	\$850	\$1,190	Analyze management agreements produced by DSS for info re: subsidiaries and licensees	Discovery (Non-Deposition)
12/20/2021	Travis Close	0.9	\$850	\$765	Analyze records proced by Cal DSS for info re: licensees and subsidiaries	Discovery (Non-Deposition)
12/20/2021	Travis Close	1.4	\$850	\$1,190	Review and analyze ESI for further evidence of transportation complaints by residents	Discovery (Non-Deposition)
12/20/2021	Travis Close	1.3	\$850	\$1,105	Review and analyze ESI for evidence of complaints involving door threshol barriers for residents	Discovery (Non-Deposition)
12/20/2021	Travis Close	1.2	\$850	\$1,020	Analyze financial SEC records of Brookdale Senior Living Inc for info re: financial accounting from subsidiaries to parent	Discovery (Non-Deposition)
12/21/2021	Guy Wallace	5.6	\$1,350	\$7,560	prepare for and defend second day of Waters deposition	Depositions
12/21/2021	Guy Wallace	0.8	\$1,350	\$1,080	com's with Waters; MTJ re results of deposition and D's anticipate arguments re class certification	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/21/2021	Mark Johnson	0.8	\$1,150	\$920	draft email to OC re expectations for meet and confer on several topics; email exchange re scheduling	Discovery (Non-Deposition)
12/21/2021	Mark Johnson	0.5	\$1,150	\$575	review chart prepared by EO of info on Brookdale subsidiaries/licensees; email exchange re same	Discovery (Non-Deposition)
12/21/2021	Rachel Steyer	0.6	\$750	\$450	editing and reviewing DMS draft declaration	Class Certification
12/21/2021	Rachel Steyer	0.3	\$750	\$225	communications on teams with SLS, DMS, PXM, and RVR about outreach	Class Outreach and Contact
12/21/2021	Travis Close	0.7	\$850	\$595	Review and analyze examples of transportation schedules (possible local policies) at brookdale facilities	Case Organization, Planning and Strategy
12/21/2021	Travis Close	0.2	\$850	\$170	Email to MTJ re: confirmation of sharing inspection photos with defense counsel	Communications With Opposing Counsel
12/21/2021	Travis Close	0.9	\$850	\$765	Analyze previous communications between experts, us and defense counsel to confirm that all materials relied upon by experts for class cert decs were shared with defenddants	Communications With Opposing Counsel
12/21/2021	Travis Close	0.4	\$850	\$340	Review and analyze completed chart of brookdale subsidiaries, agents of process by EPO for accuracy	Discovery (Non-Deposition)
12/21/2021	Travis Close	1.4	\$850	\$1,190	Analyze construction history documents received for evidence of which CBC standards (year) were applied to facilities	Discovery (Non-Deposition)
12/21/2021	Travis Close	1.6	\$850	\$1,360	Review and analyze productions by Cal DSS for complaints re: accessible transportation concerns (wheelchair, walker)	Discovery (Non-Deposition)
12/21/2021	Travis Close	1.0	\$850	\$850	Investigate SEC filings for brookdale licensees not on subsidiary list (ex. 21 to 10-k)	Discovery (Non-Deposition)
12/21/2021	Travis Close	0.8	\$850	\$680	Analyze emails from Kevin Bowman re: transportation schedules to determine extent of control over facility policies	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/22/2021	Mark Johnson	0.8	\$1,150	\$920	meet and confer call w/ OC Jacobsen and Riley re 6th set of document requests, docs ordered to be produced by 11/22 order, assessment data and local transportation policies	Discovery (Non-Deposition)
12/22/2021	Mark Johnson	0.3	\$1,150	\$345	review and analysis of D's responses and objections to 7th set of document requests	Discovery (Non-Deposition)
12/22/2021	Rachel Steyer	0.3	\$750	\$225	editing and reviewing DMS draft declaration	Class Certification
12/22/2021	Rachel Steyer	0.4	\$750	\$300	reviewing old intake for former resident, evaluating for possible declaration	Class Outreach and Contact
12/22/2021	Rachel Steyer	0.2	\$750	\$150	communications on teams about outreach with AXM, DMS, SLS	Class Outreach and Contact
12/22/2021	Rachel Steyer	6.3	\$750	\$4,725	reviewing documents, identifying additional documents and witnesses and updating supplemental initial disclosures	Discovery (Non-Deposition)
12/22/2021	Travis Close	1.2	\$850	\$1,020	Review and analyze history of communications re: production of local policies	Case Organization, Planning and Strategy
12/22/2021	Travis Close	1.4	\$850	\$1,190	Prep for M/C call -- Analyze the facilities for which plaintiff contend are new construcion, based on expert reports and other evidence	Discovery (Non-Deposition)
12/22/2021	Travis Close	1.3	\$850	\$1,105	Meet and confer with defendants, MTJ, BMU re: Plaintiffs sixth set of doc requests (part ii)	Discovery (Non-Deposition)
12/22/2021	Travis Close	0.3	\$850	\$255	Review and analyze court's order requiring the defendants produce discovery from sixth set of doc requests	Discovery (Non-Deposition)
12/22/2021	Travis Close	1.2	\$850	\$1,020	Accessible transportation policy review -- # (BKD1721908-BKD1724562) (custodian: Michael Johnson)	Discovery (Non-Deposition)
12/23/2021	Guy Wallace	0.7	\$1,350	\$945	com's with RLS re supplemental disclosures	Discovery (Non-Deposition)
12/23/2021	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re further MTC's; proposal for special master	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/23/2021	Mark Johnson	0.9	\$1,150	\$1,035	draft email / memo to OC and file summarizing meet and confer w/ OC re multiple discovery issues and identifying next steps and motions to comple	Case Organization, Planning and Strategy
12/23/2021	Mark Johnson	1.0	\$1,150	\$1,150	prepare new overall task list for litigation team; review prior notes, communications and discovery for same	Case Organization, Planning and Strategy
12/23/2021	Mark Johnson	0.7	\$1,150	\$805	calls (x2) w/ GBW re results of meet and confer, outstanding discovery issues, priorities for meet and confer, subpoenas of DSS and Brookdale subsidiaries.	Case Organization, Planning and Strategy
12/23/2021	Mark Johnson	0.1	\$1,150	\$115	email exchanges w/ OC re meet and confer on 7th set of document requests	Discovery (Non-Deposition)
12/23/2021	Rachel Steyer	0.3	\$750	\$225	reviewing and finalizing DMS draft declaration	Class Certification
12/23/2021	Rachel Steyer	0.5	\$750	\$375	editing and revising RVR draft declaration	Class Certification
12/23/2021	Rachel Steyer	1.0	\$750	\$750	attended weekly outreach meeting, separate call with TRB to discuss outreach staffing plan	Class Outreach and Contact
12/23/2021	Rachel Steyer	0.4	\$750	\$300	received call from family member of current resident, wanted to provide update as to status of sister	Class Outreach and Contact
12/23/2021	Rachel Steyer	0.2	\$750	\$150	reviewing MTJ email summarizing meet and confer with OC about discovery disputes	Discovery (Non-Deposition)
12/23/2021	Rachel Steyer	0.4	\$750	\$300	reviewing defendants' responses to p's RFPs	Discovery (Non-Deposition)
12/23/2021	Rachel Steyer	0.2	\$750	\$150	call with GBW to review questions about supplemental initial disclosures	Discovery (Non-Deposition)
12/23/2021	Rachel Steyer	0.3	\$750	\$225	email to GBW with document questions for supplemental initial disclosures	Discovery (Non-Deposition)
12/23/2021	Rachel Steyer	0.4	\$750	\$300	email to GBW with additional document questions for supplemental disclosures	Discovery (Non-Deposition)
12/23/2021	Rachel Steyer	3.6	\$750	\$2,700	reviewing documents, identifying additional witnesses and documents for disclosures, organizing and formatting document	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/24/2021	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re motion to enforce order requiring production of class list; review and analysis of draft of same	Other Motions
12/24/2021	Mark Johnson	3.0	\$1,150	\$3,450	draft P section of motion to compel compliance with Order re class member contact information	Other Motions
12/24/2021	Mark Johnson	0.2	\$1,150	\$230	email exchanges w/ GCG and GBW re draft ltr brief mtn to compel compliance with order concerning class contact information	Other Motions
12/24/2021	Rachel Steyer	0.5	\$750	\$375	editing and revising RDR draft declaration	Class Certification
12/24/2021	Rachel Steyer	0.3	\$750	\$225	email to RDR summarizing feedback and comments on draft declaration	Class Certification
12/24/2021	Rachel Steyer	0.4	\$750	\$300	editing and revising SLS draft declaration	Class Certification
12/24/2021	Rachel Steyer	0.6	\$750	\$450	editing and revising draft PXM declarations	Class Certification
12/24/2021	Rachel Steyer	0.7	\$750	\$525	drafting language for MTJ concerning training efforts for class outreach to be used for discovery letter	Class Outreach and Contact
12/24/2021	Rachel Steyer	0.2	\$750	\$150	reviewing RDR completed intake	Class Outreach and Contact
12/24/2021	Rachel Steyer	0.3	\$750	\$225	email to PXM with feedback and comments on draft declarations	Class Outreach and Contact
12/24/2021	Rachel Steyer	0.3	\$750	\$225	reviewing intake completed by AXW	Class Outreach and Contact
12/24/2021	Rachel Steyer	0.2	\$750	\$150	response to AXW with guidance concerning declaration drafting	Class Outreach and Contact
12/24/2021	Rachel Steyer	0.2	\$750	\$150	reviewing and gathering documents corresponding to likely declarant in esi production	Discovery (Non-Deposition)
12/24/2021	Rachel Steyer	0.2	\$750	\$150	reviewing and gathering documents corresponding to likely declarant in esi production	Discovery (Non-Deposition)
12/24/2021	Rachel Steyer	1.3	\$750	\$975	editing, revising, formatting, and finalizing draft of supplemental intital disclosures for reiew	Discovery (Non-Deposition)
12/24/2021	Rachel Steyer	0.3	\$750	\$225	email to GBW and cocounsel providing updated supplemental initial disclosures	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/27/2021	Mark Johnson	0.1	\$1,150	\$115	draft email to OC re joint letter brief concerning compliance with order to produce class contact information	Other Motions
12/28/2021	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re remaining scheduled depositions and preparation for same; further discovery motions	Discovery (Non-Deposition)
12/28/2021	Mark Johnson	0.2	\$1,150	\$230	email exchanges w/ COC at RBGG and GBW re depo transcripts and status	Depositions
12/28/2021	Mark Johnson	4.5	\$1,150	\$5,175	Work on draft supplemental responses to 2nd set of interrogatories to Ralph Schmidt re new construction facilities; reseach docs, construction histories and prior discovery for same and begin preparing chart for response	Discovery (Non-Deposition)
12/28/2021	Mark Johnson	0.4	\$1,150	\$460	calls (x2) w/ R Stiner re billing issues and PSP, fee adjustment and comments on PSP before signing	Discovery (Non-Deposition)
12/28/2021	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re discovery motions.	Discovery (Non-Deposition)
12/28/2021	Mark Johnson	1.5	\$1,150	\$1,725	further work on new construction chart for supp responses to Schmidt interrogatory.	Discovery (Non-Deposition)
12/29/2021	Guy Wallace	1.5	\$1,350	\$2,025	prepare for and participate in team ZOOM with GG; BBK; JY; AX; MTJ re discovery; motions to compel; outreach to former Brookdale ee's for declarations; further expert work and preparation for remaining Plaintiff depositions	Class Certification
12/29/2021	Guy Wallace	0.2	\$1,350	\$270	com's with JY re results of Algarne deposition	Depositions
12/29/2021	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ re further motions to compel; construction history supplementation; tasks for preparation of class cert reply papers	Discovery (Non-Deposition)
12/29/2021	Guy Wallace	1.1	\$1,350	\$1,485	revise and edit draft supplemental disclosures pursuant to Rule 26; com's with RLS re same	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/29/2021	Mark Johnson	0.7	\$1,150	\$805	call w/ GBW re motions to compel priorities and assignments, deposition transcripts and exhibits, DPSS and corporate subsidiary subpoenas.	Case Management Conferences
12/29/2021	Mark Johnson	0.5	\$1,150	\$575	participate in call w/ RAB re allocation of doc reviewer time	Case Management Conferences
12/29/2021	Mark Johnson	1.3	\$1,150	\$1,495	litigation team mtg w/ GBW, GCG, BBK, JY, AX re motions to compel, additional discovery and investigation, depo prep for remaining Plaintiff depositions and other planning issues and allocation of work	Case Organization, Planning and Strategy
12/29/2021	Mark Johnson	1.8	\$1,150	\$2,070	draft memo / emails to RAB, EO, TCC re supplemental responses to new construction rogs, chart for insertion of same, research needed	Discovery (Non-Deposition)
1/3/2022	Mark Johnson	2.3	\$1,150	\$2,645	prep for meet and confer w/ OC re 7th set of document requests, including outline of each rfp, objections and our arguments, review and respond to BBK analysis re RFP 9 and 10,	Discovery (Non-Deposition)
1/4/2022	Mark Johnson	0.5	\$1,150	\$575	call w COC BBK re strategy for meet and confer on RFPs 9 and 10, set 7.	Discovery (Non-Deposition)
1/4/2022	Mark Johnson	1.3	\$1,150	\$1,495	meet and confer w/ OC Jacobsenk and COC BBK re 7th set of doc requests.	Discovery (Non-Deposition)
1/4/2022	Mark Johnson	0.3	\$1,150	\$345	follow-up call w/ COC BBK re results of meet and confer w/ OC re 7th set of doc requests and next steps	Discovery (Non-Deposition)
1/4/2022	Mark Johnson	3.8	\$1,150	\$4,370	work on supplemental responses to Schmidt interrogatory responses set 2 and chart for same.	Discovery (Non-Deposition)
1/4/2022	Rachel Steyer	0.4	\$750	\$300	reviewing and editing AXW draft declaration	Class Certification
1/4/2022	Rachel Steyer	0.3	\$750	\$225	email to AXW providing comments and feedback concerning draft declaration	Class Certification
1/4/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising SLS draft declaration	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/4/2022	Rachel Steyer	0.3	\$750	\$225	reponse to AXW concerning following up with class member	Class Outreach and Contact
1/4/2022	Rachel Steyer	0.3	\$750	\$225	communications with outreach team and TRB on teams concerning outreach questions	Class Outreach and Contact
1/4/2022	Rachel Steyer	0.6	\$750	\$450	reviewing updated depo prep memo recirculated by co-counsel	Depositions
1/4/2022	Rachel Steyer	0.3	\$750	\$225	reviewing deposition transcript to identify non authentication of documents/exhibits	Depositions
1/5/2022	Rachel Steyer	2.1	\$750	\$1,575	reviewing Theresa Ward depo transcript to identify authentication of documents/exhibits issues	Depositions
1/5/2022	Rachel Steyer	1.4	\$750	\$1,050	reviewing Kimia Ataeian depo transcript to identify exhibits where deponent didnt authenticate	Depositions
1/6/2022	Guy Wallace	0.5	\$1,350	\$675	com's with BU; AX re preparation for depositions of named Plaintiffs	Depositions
1/6/2022	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ re preparation of further interrogatories	Discovery (Non-Deposition)
1/6/2022	Mark Johnson	5.5	\$1,150	\$6,325	Work on chart for supp response to rogs to Schmidt re new construction facilities, factual support and documents	Discovery (Non-Deposition)
1/6/2022	Mark Johnson	0.3	\$1,150	\$345	emails to G Waters re construction history chart with descriptions and documentation for supp responses to Schmidt rog and re field note to be produced.	Discovery (Non-Deposition)
1/6/2022	Mark Johnson	1.4	\$1,150	\$1,610	work on draft set of additional rogs re access, transportation polices, access work, etc.; work on tracking log for rfps, rogs	Discovery (Non-Deposition)
1/6/2022	Mark Johnson	0.2	\$1,150	\$230	follow up email w/ RAB, EO, TCC re new construction chart for supp rog responses.	Discovery (Non-Deposition)
1/6/2022	Mark Johnson	0.2	\$1,150	\$230	coms w/ GCG and AX re production of docs for Solomon and confidentiality acknowledgment	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/6/2022	Rachel Steyer	0.2	\$750	\$150	call with DMS to discuss and review outreach questions	Class Outreach and Contact
1/6/2022	Rachel Steyer	0.2	\$750	\$150	reviewing SLS completed intake	Class Outreach and Contact
1/6/2022	Rachel Steyer	0.3	\$750	\$225	communications on teams with DMS, AXW, RDR, TRB concerning outreach questions and efforts	Class Outreach and Contact
1/6/2022	Rachel Steyer	1.3	\$750	\$975	completing review of Kimia Ataeian depo transcript to identify issues with authenticating exhibits	Depositions
1/6/2022	Rachel Steyer	1.6	\$750	\$1,200	reviewing Marie Harris depo transcript and noting authentication of exhibit issues	Depositions
1/6/2022	Rachel Steyer	0.9	\$750	\$675	reviewing Anna Reddy depo transcript and identifying issues with authentication of documents/exhibits	Depositions
1/6/2022	Rachel Steyer	0.3	\$750	\$225	reviewing esi production for documents corresponding to potential declarant	Discovery (Non-Deposition)
1/7/2022	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ; BBK re preparation for named Plaintiff depositions and production of documents re same	Depositions
1/7/2022	Mark Johnson	1.0	\$1,150	\$1,150	revise draft of BJH rogs to Ds re transportation policies, access improvements and bank accounts; circulate to COC and corporate experts; draft cover email re same	Discovery (Non-Deposition)
1/7/2022	Mark Johnson	0.3	\$1,150	\$345	coms w/ GBW and LEC re approval, finalization and service of BJH rogs	Discovery (Non-Deposition)
1/7/2022	Mark Johnson	0.2	\$1,150	\$230	coms w/ RLS re contact list for residents and outreach based on same	Discovery (Non-Deposition)
1/7/2022	Mark Johnson	0.7	\$1,150	\$805	call w/ June Kailes re review of transcript, errata, D's requests for additional documents, extension of time for Errata.	Experts (Including Retention)
1/7/2022	Mark Johnson	1.0	\$1,150	\$1,150	work on section of joint discovery ltr re rfp10, set 6 re identity of caregivers and related information; review discovery and meet and confer notes for same.	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/7/2022	Rachel Steyer	1.0	\$750	\$750	editing and revising PXM draft declarations	Class Certification
1/7/2022	Rachel Steyer	0.2	\$750	\$150	response to PXM with feedback about draft declarations	Class Certification
1/7/2022	Rachel Steyer	1.8	\$750	\$1,350	completing review of Anna Reddy depo transcript and identifying issues with authentication of exhibits	Depositions
1/7/2022	Rachel Steyer	0.8	\$750	\$600	reviewing Ferdinand Buot depo transcript to identify issues with authentication of exhibits	Depositions
1/7/2022	Rachel Steyer	0.3	\$750	\$225	reviewing email from cocounsel concerning outreach to former Brookdale employees, reviewing attached civil complaints	Misc. Research
1/10/2022	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of deposition preparation outlines and notes re potential topics and questions for named P's	Depositions
1/10/2022	Guy Wallace	1.2	\$1,350	\$1,620	com's with Vallette; AX re preparation for deposition	Depositions
1/10/2022	Guy Wallace	0.8	\$1,350	\$1,080	com's with MTJ re responses to Maatman correspondence re depositions and document production; MTJ re staff who provide direct care; deposition preparation for named P's	Discovery (Non-Deposition)
1/10/2022	Mark Johnson	0.4	\$1,150	\$460	calls w/ GBW re motion to compel re direct care staff, Maatman ltrs re late production and depositions, plaintiff depo prep	Discovery (Non-Deposition)
1/10/2022	Mark Johnson	0.3	\$1,150	\$345	email exchanges w/ COC re resident handbook and emergency plan, need for supplemental production.	Discovery (Non-Deposition)
1/10/2022	Mark Johnson	0.3	\$1,150	\$345	call w/ J Thornton re Schroyer dec., staffing analysis and arguments supporting need for mtc data identifying staff qualified to provide direct care.	Other Motions
1/10/2022	Mark Johnson	2.3	\$1,150	\$2,645	continue working on and finalize draft P section of ltr brief to compel responses to rfp 10 and 11, set 6; draft email to COC re same	Other Motions
1/10/2022	Rachel Steyer	0.6	\$750	\$450	editing and reviewing SLS draft declarations	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/10/2022	Rachel Steyer	0.6	\$750	\$450	editing draft DMS declaration	Class Certification
1/10/2022	Rachel Steyer	0.2	\$750	\$150	call with TRB to discuss new class list	Class Outreach and Contact
1/10/2022	Rachel Steyer	0.3	\$750	\$225	call with SLS to discuss draft declarations, reviewing outreach questions	Class Outreach and Contact
1/10/2022	Rachel Steyer	0.3	\$750	\$225	reviewing SLS completed intake	Class Outreach and Contact
1/10/2022	Rachel Steyer	0.3	\$750	\$225	communications on teams with RDR, SLS, TRB concerning class outreach	Class Outreach and Contact
1/10/2022	Rachel Steyer	0.3	\$750	\$225	completing review of Ferdinand Buot depo transcript to identify exhibit authentication issues	Depositions
1/10/2022	Rachel Steyer	1.3	\$750	\$975	reviewing Rhonda Dolcater depo transcript to identify issues with authenticating exhibits	Depositions
1/10/2022	Rachel Steyer	1.5	\$750	\$1,125	reviewing Jeffrey Toomer depo transcript and identifying authentication issues with exhibits	Depositions
1/10/2022	Rachel Steyer	0.4	\$750	\$300	reviewing Kevin Bowman 30b6 depo transcript to identify issues with exhibit authentication	Depositions
1/10/2022	Rachel Steyer	0.3	\$750	\$225	reviewing esi production to locate files for likely declarant	Discovery (Non-Deposition)
1/10/2022	Travis Close	0.2	\$850	\$170	Email to team re: coordinating time for call on supplemental ROG responses	Case Organization, Planning and Strategy
1/10/2022	Travis Close	0.2	\$850	\$170	Email to AXU re: acknowledgement forms for experts Petersa and Thornton	Case Organization, Planning and Strategy
1/10/2022	Travis Close	0.3	\$850	\$255	Review and analyze updated version of depo control log by LEC	Depositions
1/10/2022	Travis Close	1.2	\$850	\$1,020	Analyze draft transcript of Jestrabek-Hart for potentially damaging statements	Depositions
1/10/2022	Travis Close	0.4	\$850	\$340	Review and analyze depo errata for Doug Cross (Pt 2)	Depositions
1/10/2022	Travis Close	0.7	\$850	\$595	Review and analyze welcome packets introduced as exhibits at plaintiff depositions for misrepresentations/omissions and promises of care	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/10/2022	Travis Close	0.7	\$850	\$595	Review and analyze charts of account definitions produced Brookdale with common abbreviations;	Discovery (Non-Deposition)
1/10/2022	Travis Close	0.5	\$850	\$425	Review and analyze correspondance between us and architectural experts re: construction history chart to provide as supplemental responses to ROGs	Discovery (Non-Deposition)
1/10/2022	Travis Close	0.6	\$850	\$510	Analyze construction history notes by jeff mastin for info re: statement of construction history to be used in supplemental ROGs responses for P Schmidt	Discovery (Non-Deposition)
1/10/2022	Travis Close	0.4	\$850	\$340	Review analyze by EPO re: construction history evidence produced in binder by architectural experts that is missing bates numbers	Discovery (Non-Deposition)
1/10/2022	Travis Close	0.3	\$850	\$255	Review and analyze draft joint discovery letter by JY re: performance reviews and corrective action plans	Discovery (Non-Deposition)
1/10/2022	Travis Close	0.2	\$850	\$170	Review and analyze ROGs from Bernie Jestrabek-Hart, set one, served on defendants	Discovery (Non-Deposition)
1/10/2022	Travis Close	1.3	\$850	\$1,105	Review and analyze budget/income/accounting reports produced by Brookdale for info re: account names and financial institutions used for payroll, paystubs.	Discovery (Non-Deposition)
1/10/2022	Travis Close	0.2	\$850	\$170	Email to LEC re: locating acknowledgement forms for experts	Experts (Including Retention)
1/11/2022	Guy Wallace	0.5	\$1,350	\$675	revise and edit draft MTC re documents re enforcement of staffing benchmarks; training re direct care of residents	Other Motions
1/11/2022	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re RFP 10, 11, set 6 and mtc, other discovery issues.	Discovery (Non-Deposition)
1/11/2022	Mark Johnson	0.7	\$1,150	\$805	team call with RAB, TCC, EO re status of new construction chart for Schmidt supplemental rogs and process for completing missing bates numbers and other information.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/11/2022	Mark Johnson	0.6	\$1,150	\$690	call w/ G Waters re re-scanning Northridge Field notes, issues re new construction and documentation of same for supplemental responses to Schmidt rogs.	Discovery (Non-Deposition)
1/11/2022	Mark Johnson	3.5	\$1,150	\$4,025	continue working on chart for insert to Schmidt supplemental rogs and directions to RAB, EO, TCC re same	Discovery (Non-Deposition)
1/11/2022	Mark Johnson	1.7	\$1,150	\$1,955	review 17 management agreements produced by D (1,900 pages)	Discovery (Non-Deposition)
1/11/2022	Mark Johnson	0.4	\$1,150	\$460	draft email to file, COC summarizing management agreements produced by Ds; com from TCC re unredacted version of one of	Discovery (Non-Deposition)
1/11/2022	Rachel Steyer	0.2	\$750	\$150	call with SLS to discuss intake and review whether responsible party would be a good fit for a declaration	Class Outreach and Contact
1/11/2022	Rachel Steyer	0.6	\$750	\$450	reviewing Kevin Bowman topic 10 depo transcript to identify authentication issues	Depositions
1/11/2022	Rachel Steyer	0.5	\$750	\$375	reviewing Kevin Bowman topic 16 depo transcript to identify any issues with authentication of exhibits	Depositions
1/11/2022	Rachel Steyer	0.4	\$750	\$300	reviewing 060321 Kevin Bowman depo to identify issues with authenticating exhibits	Depositions
1/11/2022	Rachel Steyer	0.8	\$750	\$600	reviewing Kevin Bowman Topic 11 30b6 depo transcript to identify authentication issues with exhibits	Depositions
1/11/2022	Rachel Steyer	2.4	\$750	\$1,800	reviewing Kevin Bowman Topic 2 depo transcript to identify authentication issues w/exhibits	Depositions
1/11/2022	Rachel Steyer	1.8	\$750	\$1,350	reviewing Kevin Bowman depo transcripts to identify authentication issues	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/11/2022	Travis Close	1.1	\$850	\$935	Review and analyze recent DSS facility evaluation reports and complaint investigation reports issued for North Fremont, Riverwalk, North Tarzana, Central Whittier, Irvine, Sterling Court, Sunwest, Elk Grove, San Marcos, Tracy, and Lodi facilities (mid to late December)	Case Organization, Planning and Strategy
1/11/2022	Travis Close	0.3	\$850	\$255	Review and analyze revised task list prepared by MTJ	Case Organization, Planning and Strategy
1/11/2022	Travis Close	1.2	\$850	\$1,020	Analyze transcript of Mastin depo for potential errata -- Pages 1-64	Depositions
1/11/2022	Travis Close	0.9	\$850	\$765	Analyze transcript of Mastin depo for errata -- Pages 65-133	Depositions
1/11/2022	Travis Close	0.6	\$850	\$510	Review and analyze recent DSS facility evaluation reports and complaint investigation reports issued for Oceanside, San Marcos, Clairemont, Sunwest, Irvine, and Garden Grove facilities (early January)	Discovery (Non-Deposition)
1/11/2022	Travis Close	0.3	\$850	\$255	Email to team re: unredacted versions of Def's latest productions of management agreements already produced by DSS	Discovery (Non-Deposition)
1/11/2022	Travis Close	0.7	\$850	\$595	Begin searching for and analyzing duplicate (unredacted) versions of management agreements produced by defendants, which were already produced by DSS	Discovery (Non-Deposition)
1/11/2022	Travis Close	0.7	\$850	\$595	team meeting w/ MTJ, EPO, RAB re construction history responses for Schmidt ROGs	Experts (Including Retention)
1/11/2022	Travis Close	1.1	\$850	\$935	Extract bates numbered versions of new construction history evidence for Mastin binder (Brookhurst-Santa Monica Gardens)	Experts (Including Retention)
1/12/2022	Guy Wallace	1.2	\$1,350	\$1,620	com's with Michele Lytle and JSY re preparation for deposition	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/12/2022	Guy Wallace	0.3	\$1,350	\$405	review and analysis of summary of depo testimony from Vallette; com with AX re same	Depositions
1/12/2022	Guy Wallace	0.5	\$1,350	\$675	com's with RLS re preparation of further draft of the Rule 26 disclosures	Discovery (Non-Deposition)
1/12/2022	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re P deposition prep and testimony, ltr to OC re depo-related doc production and in person depos	Depositions
1/12/2022	Mark Johnson	0.8	\$1,150	\$920	email exchanges w/ AX and GCG re call w/ corporate expert, docs and information to be provided to expert; locate and send prior emails and documents re same	Experts (Including Retention)
1/12/2022	Rachel Steyer	0.3	\$750	\$225	call with GBW to review supplemental disclosures and class member declarations	Case Organization, Planning and Strategy
1/12/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising RDR draft declaration	Class Certification
1/12/2022	Rachel Steyer	0.2	\$750	\$150	email to RDR with feedback and comments on draft declaration	Class Certification
1/12/2022	Rachel Steyer	1.3	\$750	\$975	reviewubg depoo transcript fpr Audrey Withers to look fir inaccurate idebtificatinos	Class Outreach and Contact
1/12/2022	Rachel Steyer	1.4	\$750	\$1,050	reviewing Kevin Bowman topic 5 depo transcript to identify authentication issues	Depositions
1/12/2022	Rachel Steyer	2.4	\$750	\$1,800	reviewing Kevin Bowman Topic 5 depo transcript to identify issues with exhibit authentication	Depositions
1/12/2022	Travis Close	0.3	\$850	\$255	Review, analyze, and revise draft letter to Defendants re: in person depos and production of docs at time of depositoin	Depositions
1/12/2022	Travis Close	1.1	\$850	\$935	Analyze Mastin depo transcript for errata, pages 133-201	Depositions
1/12/2022	Travis Close	0.9	\$850	\$765	Analyze Mastin depo transcript for errata, pages 202-258	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/13/2022	Guy Wallace	1.4	\$1,350	\$1,890	prepare for and participate in depo prep with Michele Lytle; JSY	Depositions
1/13/2022	Mark Johnson	0.6	\$1,150	\$690	zoom call w GCG, AX and experts Tran and Solomon re materials provided and needed for expert analysis of corporate relationships and alter ego issues	Experts (Including Retention)
1/13/2022	Mark Johnson	0.1	\$1,150	\$115	pre-call w/ AX re docs to provide to Solomon, Tran before expert call	Experts (Including Retention)
1/13/2022	Mark Johnson	0.3	\$1,150	\$345	folllow-up call w GCG, AX after expert call re next step, priorities and additional document requests.	Experts (Including Retention)
1/13/2022	Rachel Steyer	0.2	\$750	\$150	reviewing SLS completed intake	Class Outreach and Contact
1/13/2022	Rachel Steyer	0.3	\$750	\$225	reviewing intakes and declaration worksheet, class outreach efforts in sharepoint	Class Outreach and Contact
1/13/2022	Rachel Steyer	1.7	\$750	\$1,275	reviewing Sheila Garner depo transcript to identify authentication issues with exhibits	Depositions
1/13/2022	Rachel Steyer	0.5	\$750	\$375	reviewing Kevin Bowman topic 16 depo transcript to identify any authentication issues	Depositions
1/13/2022	Travis Close	0.2	\$850	\$170	Review and analyze notes by AXU re: depo of Loresia Vallette	Depositions
1/13/2022	Travis Close	0.6	\$850	\$510	Analyze and extract screenshots of City databases, and other docs downloaded from City websites that support construction history of facilities, for bates stamping	Discovery (Non-Deposition)
1/13/2022	Travis Close	1.2	\$850	\$1,020	ROG responses -- analyze construction binder for Waters to highlight docs showing evidence of alterations (not new construction)	Discovery (Non-Deposition)
1/13/2022	Travis Close	1.4	\$850	\$1,190	Analyze early spreadsheets provided (Income Statement, Salaries, 12 month budget report) & regional meeting minutes for info re: flow of income from Brookdale facilities to corporate accounts	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/13/2022	Travis Close	0.8	\$850	\$680	Organize management/lease agreements and create chart for task of locating provisions in agreements related to responsibilities for capital improvements	Discovery (Non-Deposition)
1/13/2022	Travis Close	1.2	\$850	\$1,020	ROG responses -- analyze construction binder for Jeff Mastin to highlight docs showing evidence of alterations (not new construction)	Experts (Including Retention)
1/13/2022	Travis Close	0.5	\$850	\$425	Analyze alterations cited in Waters Dec & compare to construction evidence cited in his binder	Experts (Including Retention)
1/14/2022	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of draft reply declarations from class members re class certification; com's with MTJ; RLS re same	Class Certification
1/14/2022	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ re D's demand for notes prepared by Kailes; Cross errata	Discovery (Non-Deposition)
1/14/2022	Mark Johnson	0.5	\$1,150	\$575	com w/ class member's daughter Tracie Keough re status of case; draft declaration iso reply in support of class cert, next steps.	Class Certification
1/14/2022	Mark Johnson	0.4	\$1,150	\$460	coms w/ GBW, RLS, others re class member outreach, prep of decs iso class cert reply, communication with Tracie Keough	Class Certification
1/14/2022	Mark Johnson	0.7	\$1,150	\$805	call w/ TCC, EO, RAB re project tasks for development of new construction chart for supp responses to Schmidt rogs, revised construction history binders with bates numbered docs.	Discovery (Non-Deposition)
1/14/2022	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW re Cross Errata, docs demanded by D from Kailes	Discovery (Non-Deposition)
1/14/2022	Mark Johnson	0.1	\$1,150	\$115	email exchange w/ BU re scope of supplemental production b4 client depo	Discovery (Non-Deposition)
1/14/2022	Mark Johnson	0.8	\$1,150	\$920	call w/ June Kailes re depo erratta, notes and demands from Defs for notes snd documents	Experts (Including Retention)
1/14/2022	Rachel Steyer	0.5	\$750	\$375	call with RDR to discuss and review declaration	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/14/2022	Rachel Steyer	1.2	\$750	\$900	follow up call with declarant to review draft declaration and missing information, added to intake	Class Certification
1/14/2022	Rachel Steyer	0.5	\$750	\$375	editing and revising PXM draft declaration	Class Certification
1/14/2022	Rachel Steyer	0.5	\$750	\$375	reviewing and preparing sheet to track declaration status	Class Certification
1/14/2022	Rachel Steyer	1.2	\$750	\$900	incorporating edits and revising draft class member declaration	Class Certification
1/14/2022	Rachel Steyer	0.3	\$750	\$225	reviewing KGJ completed intake	Class Outreach and Contact
1/14/2022	Rachel Steyer	0.4	\$750	\$300	communications on teams with TRB, GSL, KGJ, PXM, SLS concerning outreach efforts	Class Outreach and Contact
1/14/2022	Rachel Steyer	0.2	\$750	\$150	email to GLS and KGJ concerning setting up time for declaration drafting	Class Outreach and Contact
1/14/2022	Rachel Steyer	0.4	\$750	\$300	reviewing and editing GSL completed intake	Class Outreach and Contact
1/14/2022	Rachel Steyer	0.3	\$750	\$225	reviewing esi production to identify documents corresponding to likely declarants	Discovery (Non-Deposition)
1/14/2022	Travis Close	0.6	\$850	\$510	research re: COVID-19 infections at CA Brookdale facilities in 2021	Case Organization, Planning and Strategy
1/14/2022	Travis Close	1.2	\$850	\$1,020	Meeting with RAB, EPO, MTJ re: completing construction history binders and ROG response chart	Discovery (Non-Deposition)
1/14/2022	Travis Close	0.2	\$850	\$170	Email to MTJ re: Gary Waters binder	Discovery (Non-Deposition)
1/14/2022	Travis Close	1.3	\$850	\$1,105	Analyze citations in ROG response chart to verify accuracy with bates numbered docs and expert construction binders (Alhambra - Oceanside)	Discovery (Non-Deposition)
1/14/2022	Travis Close	1.4	\$850	\$1,190	Analyze citations in ROG response chart to verify accuracy with bates numbered docs and expert construction binders (Oceanside - Yorba Linda)	Discovery (Non-Deposition)
1/14/2022	Travis Close	0.2	\$850	\$170	Review and analyze notes by co-counsel from Lytle deposition	Discovery (Non-Deposition)
1/18/2022	Guy Wallace	1.4	\$1,350	\$1,890	prepare for and participate in zoom with Fisher; BU re deposition preparation	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/18/2022	Mark Johnson	0.1	\$1,150	\$115	call w/ TCC re chart for supplemental responses to Schmidt rogs on new construction facilities.	Discovery (Non-Deposition)
1/18/2022	Rachel Steyer	0.3	\$750	\$225	call with DMS to discuss questions pertaining to draft declaration	Class Certification
1/18/2022	Rachel Steyer	0.9	\$750	\$675	call with GSL and KGJ concerning declaration drafting	Class Certification
1/18/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising SLS draft declaration	Class Certification
1/18/2022	Rachel Steyer	0.8	\$750	\$600	editing AXW draft declaration	Class Certification
1/18/2022	Rachel Steyer	0.3	\$750	\$225	reviewing intake completed by RVR	Class Outreach and Contact
1/18/2022	Rachel Steyer	0.3	\$750	\$225	reviewing outreach efforts in new class list, updating and reviewing intakes and declaration tracking spreadsheet	Class Outreach and Contact
1/18/2022	Rachel Steyer	0.5	\$750	\$375	communications on teams with GSL, TRB, PXM, DMS, RVR, JGK concerning outreach	Class Outreach and Contact
1/18/2022	Rachel Steyer	0.2	\$750	\$150	reviewing email from co-counsel summarizing depo of named plaintiff	Depositions
1/18/2022	Rachel Steyer	0.4	\$750	\$300	reviewing ESI production for documents corresponding to likely declarant	Discovery (Non-Deposition)
1/18/2022	Rachel Steyer	0.4	\$750	\$300	reviewing esi production for documents corresponding to likely declarants	Discovery (Non-Deposition)
1/18/2022	Rachel Steyer	2.3	\$750	\$1,725	additional work updating supplemental initial disclosures, identifying additional categories of documents for disclosure	Discovery (Non-Deposition)
1/18/2022	Travis Close	0.2	\$850	\$170	Email to MTJ re: status report on construction history binders and ROG responses	Discovery (Non-Deposition)
1/18/2022	Travis Close	0.2	\$850	\$170	Email to RAB re PLTF prefix needed on two additional documents	Discovery (Non-Deposition)
1/18/2022	Travis Close	0.2	\$850	\$170	Call to MTJ re coordination of final work to do on ROG response chart of construction history	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/18/2022	Travis Close	1.7	\$850	\$1,445	Verify cites to construction evidence in chart response to ROGs - Mastin	Discovery (Non-Deposition)
1/18/2022	Travis Close	0.9	\$850	\$765	Remove cites to alterations evidence in chart response to ROGs	Discovery (Non-Deposition)
1/19/2022	Guy Wallace	0.9	\$1,350	\$1,215	com's with MTJ; TCC; RLS re Supplemental disclosures; class outreach; supplemental discovery responses re new construction and alterations; further motions to compel	Discovery (Non-Deposition)
1/19/2022	Mark Johnson	0.8	\$1,150	\$920	call w/ GBW, TCC and RLS re project status, declaration outreach, construction history, deposition summaries	Case Organization, Planning and Strategy
1/19/2022	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re status of tasks, proposed meeting of SW team to discuss same	Case Organization, Planning and Strategy
1/19/2022	Mark Johnson	0.5	\$1,150	\$575	call w/ Brian Umpierre re depo of plaintiff rep; RAB joined for .1 re related documents	Depositions
1/19/2022	Mark Johnson	1.2	\$1,150	\$1,380	preliminary review of D production of additional management agreements	Discovery (Non-Deposition)
1/19/2022	Mark Johnson	0.2	\$1,150	\$230	draft follow-up email re production of resident files for 82 declarants, review prior order and notes of meet and confer for same	Discovery (Non-Deposition)
1/19/2022	Mark Johnson	1.0	\$1,150	\$1,150	review and revise table of new construction for supplemental responses to Schmidt rog, draft email to experts with attachments for review.	Discovery (Non-Deposition)
1/19/2022	Rachel Steyer	0.9	\$750	\$675	call with GBW, MTJ, TCC to review tasks and projects	Case Organization, Planning and Strategy
1/19/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising draft DMS declaration	Class Certification
1/19/2022	Rachel Steyer	0.7	\$750	\$525	call with AXW to review and discuss draft class member declaration	Class Certification
1/19/2022	Rachel Steyer	0.7	\$750	\$525	editing and revising SLS draft declarations	Class Certification
1/19/2022	Rachel Steyer	0.2	\$750	\$150	email to SLS with feedback on draft declaration	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/19/2022	Rachel Steyer	0.4	\$750	\$300	communications on teams with DMS, SLS, RDR, RVR, AXW, GSL concerning outreach efforts	Class Outreach and Contact
1/19/2022	Travis Close	1.0	\$850	\$850	Team meeting w/ RLS, GBW, MTJ re: additional motions to compel, discovery projects, and corporations expert	Case Organization, Planning and Strategy
1/19/2022	Travis Close	1.4	\$850	\$1,190	Review and analyze depo of Jeanette Algarne for admissions testimony in areas of care and physical access barriers	Depositions
1/19/2022	Travis Close	1.4	\$850	\$1,190	Review and analyze depo of Jeanette Algarne for admissions re quality of care provided and physical access barriers	Depositions
1/19/2022	Travis Close	1.5	\$850	\$1,275	Verify cites to construction evidence in chart response to ROGs - Waters	Discovery (Non-Deposition)
1/19/2022	Travis Close	1.2	\$850	\$1,020	Edits to chart of construction history for ROGs responses for Plaintiff Schmidt	Discovery (Non-Deposition)
1/19/2022	Travis Close	0.2	\$850	\$170	Email to MTJ re: changes made to ROG response table of construction history	Discovery (Non-Deposition)
1/19/2022	Travis Close	0.8	\$850	\$680	Review and analyze references to Tubbs Fire in Fountaingrove community (cited in Lytle depo) and link to Brookdale's emergency evacuation services/plan	Discovery (Non-Deposition)
1/19/2022	Travis Close	0.3	\$850	\$255	Email to team re: video showing fire evacuation from Tubbs facility and link to BKD'd emergency transportation services	Discovery (Non-Deposition)
1/20/2022	Mark Johnson	0.2	\$1,150	\$230	call w/ COC BU re depo status and possible rebuttal examination.	Depositions
1/20/2022	Mark Johnson	0.8	\$1,150	\$920	call w/ J Thornton re email from OC concerning assessment data, strategy and capacity for additional assessments based on data, analysis of info provided by Ds	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/20/2022	Mark Johnson	2.8	\$1,150	\$3,220	review Mastin comments and proposed edits to table and comments on revised construction history binder; revise table; draft email to TCC with proposed changes	Discovery (Non-Deposition)
1/20/2022	Mark Johnson	0.6	\$1,150	\$690	review D's additions to data audit for call w/ J Thornton	Discovery (Non-Deposition)
1/20/2022	Mark Johnson	0.3	\$1,150	\$345	review and analyze draft rogs and rfps from AX re corporate ownership / structure issues	Discovery (Non-Deposition)
1/20/2022	Rachel Steyer	0.5	\$750	\$375	editing and revising RDR draft declaration	Class Certification
1/20/2022	Rachel Steyer	0.2	\$750	\$150	editing SLS draft declaration	Class Certification
1/20/2022	Rachel Steyer	0.3	\$750	\$225	reviewing intake completed by SLS, providing comments and feedback	Class Outreach and Contact
1/20/2022	Rachel Steyer	0.3	\$750	\$225	reviewing GSL completed intake with family member	Class Outreach and Contact
1/20/2022	Rachel Steyer	0.3	\$750	\$225	reviewing esi production for documents corresponding to likely declarant	Discovery (Non-Deposition)
1/20/2022	Rachel Steyer	0.3	\$750	\$225	reviewing ESI production for any documents corresponding to potential declarant	Discovery (Non-Deposition)
1/20/2022	Rachel Steyer	3.3	\$750	\$2,475	reviewing corrective action documents, compiling list of unsigned documents	Discovery (Non-Deposition)
1/20/2022	Rachel Steyer	0.2	\$750	\$150	reviewing draft ROGS and RFPs prepared and circulated by cocounsel	Discovery (Non-Deposition)
1/20/2022	Rachel Steyer	1.1	\$750	\$825	reviewing categories of documents and updating supplemental initial disclosures	Discovery (Non-Deposition)
1/20/2022	Travis Close	1.2	\$850	\$1,020	Review and analyze comments & proposed changes to binder by jeff mastin	Discovery (Non-Deposition)
1/20/2022	Travis Close	0.3	\$850	\$255	Emai to MTJ, GBW re: resolving suggestions by jeff mastin to binder and ROG response table	Discovery (Non-Deposition)
1/20/2022	Travis Close	1.1	\$850	\$935	Review and analyze communications re: Tubbs 2017 fire to determine whether Brookdale contracted emergency evacuation provider was activated	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/20/2022	Travis Close	0.7	\$850	\$595	Investigate relationship between MG Tenant and Health Care REIT -- owners, operators, etc.	Discovery (Non-Deposition)
1/20/2022	Travis Close	1.3	\$850	\$1,105	Begin indexing chart of Managament/Operating/Lease agreements with parties and relationships, relevant provisions for capital improvements	Discovery (Non-Deposition)
1/20/2022	Travis Close	1.5	\$850	\$1,275	Analyze current version of Mastin binder and ROG response table to resolve comments made by Jeff Mastin	Experts (Including Retention)
1/20/2022	Travis Close	1.6	\$850	\$1,360	Further edits and revisions to Jeff Mastin binder based on feedback by JM and MtJ	Experts (Including Retention)
1/21/2022	Guy Wallace	1.1	\$1,350	\$1,485	team zoom with JSY; BBK; AX; KS; EH; BU; MTJ; TCC; RLS re discovery; motions to compel; supplemental disclosures; outreach to putative class members and other witnesses	Class Certification
1/21/2022	Guy Wallace	0.5	\$1,350	\$675	review and analysis of D's section of MTC re employee training records and notices of corrective action; com's with JY and MTJ re same	Other Motions
1/21/2022	Mark Johnson	1.0	\$1,150	\$1,150	team mtg to discuss tasks and allocation of work, including motions to compel, investigations, supplemental disclosures, etc.	Case Organization, Planning and Strategy
1/21/2022	Mark Johnson	1.0	\$1,150	\$1,150	call w/ J Mastin and TCC to review revisions to construction history binder and table for supp responses to Schmidt interrogatory	Discovery (Non-Deposition)
1/21/2022	Mark Johnson	0.7	\$1,150	\$805	call w/ June Kailes and TCC re review of deposition transcript and identification of corrections for same	Discovery (Non-Deposition)
1/21/2022	Mark Johnson	1.8	\$1,150	\$2,070	work on discovery ltr, revisions to P section, re RFP 10 and 11, set 6.	Other Motions
1/21/2022	Rachel Steyer	1.1	\$750	\$825	bi-weekly meeting with co-counsel to discuss ongoing tasks and assignments	Case Organization, Planning and Strategy
1/21/2022	Rachel Steyer	0.5	\$750	\$375	editing and revising KGJ draft declarations	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/21/2022	Rachel Steyer	0.9	\$750	\$675	call with KGJ to discuss and review draft declarations	Class Certification
1/21/2022	Rachel Steyer	0.2	\$750	\$150	call with SLS to review and discuss edits to draft declaration	Class Certification
1/21/2022	Rachel Steyer	0.2	\$750	\$150	preparing list of potential (former) executive directors for co-counsel to reach out to as part of investigation	Class Certification
1/21/2022	Rachel Steyer	0.7	\$750	\$525	continuing partial intake call with earlier responsible party, scheduled follow up call	Class Outreach and Contact
1/21/2022	Rachel Steyer	0.4	\$750	\$300	adding additional information to intake incorporating information received in documents provided by responsible party	Class Outreach and Contact
1/21/2022	Rachel Steyer	0.6	\$750	\$450	call with declarant to review and clarify different portions of intake	Class Outreach and Contact
1/21/2022	Rachel Steyer	0.5	\$750	\$375	reviewing esi production to gather documents for likely declarant	Discovery (Non-Deposition)
1/21/2022	Rachel Steyer	0.3	\$750	\$225	reviewing co-counsel's notes from meet and confer	Discovery (Non-Deposition)
1/21/2022	Rachel Steyer	0.7	\$750	\$525	reviewing and incorporating co-counsel's edits into supplemental initial disclosures	Discovery (Non-Deposition)
1/21/2022	Travis Close	1.1	\$850	\$935	Team meeting re ownership discovery, communications with former employees, depo summaries, etc	Case Organization, Planning and Strategy
1/21/2022	Travis Close	1.8	\$850	\$1,530	Prepare errata sheet for June Kailes deposition based on her comments and today's call	Depositions
1/21/2022	Travis Close	0.2	\$850	\$170	Email to MTJ re: today's call with Jeff at 9am re construction history binder	Discovery (Non-Deposition)
1/21/2022	Travis Close	1.1	\$850	\$935	Meeting with MTJ, JM re: revisions to construction history binder	Discovery (Non-Deposition)
1/21/2022	Travis Close	1.6	\$850	\$1,360	Further changes to Mastin construction binder after this morning's call with JM, MTJ	Discovery (Non-Deposition)
1/21/2022	Travis Close	0.9	\$850	\$765	Review and analyze draft supplemental disclosures by RLS and edits by BBK	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/21/2022	Travis Close	0.3	\$850	\$255	Review and analyze draft ROGs and RFPs by AXU re: info needed by corporations expert	Discovery (Non-Deposition)
1/21/2022	Travis Close	0.7	\$850	\$595	Call with June Kailes and MTJ re errata for Kailes deposition	Experts (Including Retention)
1/23/2022	Mark Johnson	1.0	\$1,150	\$1,150	finalize and distribute to COC with cover Ps edits to joint ltr brief on RFP 10, 11, set 6	Other Motions
1/24/2022	Guy Wallace	1.3	\$1,350	\$1,755	prepare for and participate in deposition preparation session with R. Carlson; BBK	Depositions
1/24/2022	Guy Wallace	0.4	\$1,350	\$540	review and analysis of response to D's arguments re MTC re training records; notices of corrective actions, etc.; com's with MTJ re same	Other Motions
1/24/2022	Mark Johnson	0.7	\$1,150	\$805	further revisions to joint ltr brief P section on set 6 of RFPs, 10 and 11; draft email to OC re same	Other Motions
1/24/2022	Rachel Steyer	0.6	\$750	\$450	editing and revising GSL draft declaration	Class Certification
1/24/2022	Rachel Steyer	0.5	\$750	\$375	editing and revising RDR draft class member declaration	Class Certification
1/24/2022	Rachel Steyer	0.3	\$750	\$225	call with KGJ to discuss and review how to incorporate declarant emails into draft declaration	Class Certification
1/24/2022	Rachel Steyer	0.5	\$750	\$375	communications on teams with KGJ, DMS, GSL concerning outreach efforts	Class Outreach and Contact
1/24/2022	Rachel Steyer	1.2	\$750	\$900	reviewing 30b6 topic 16 depo to identify instances when witness did not know the answer to questions within scope of depo topic	Depositions
1/24/2022	Rachel Steyer	2.0	\$750	\$1,500	reviewing 30b6 depo topic 3 to identify instances when witness did not know the answer to questions within scope of depo topic	Depositions
1/24/2022	Rachel Steyer	0.2	\$750	\$150	reviewing plaintiffs' revised section of joint discovery letter brief as circulated by MTJ	Discovery (Non-Deposition)
1/24/2022	Rachel Steyer	0.2	\$750	\$150	reviewing emails gathered by KGJ for likely declarant	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/24/2022	Rachel Steyer	1.2	\$750	\$900	reviewing documents and continuing to update supplemental initial disclosures	Discovery (Non-Deposition)
1/24/2022	Travis Close	0.2	\$850	\$170	Email to RAB re: additional docs requiring bates numbering	Case Organization, Planning and Strategy
1/24/2022	Travis Close	1.5	\$850	\$1,275	Analyze provisions in Emeritus-Brookdale merger for info re: operational control of facilities	Case Organization, Planning and Strategy
1/24/2022	Travis Close	1.3	\$850	\$1,105	Review, analyze and organize master lease agreements from CDSS production -- CDSS000001-000903	Discovery (Non-Deposition)
1/24/2022	Travis Close	1.4	\$850	\$1,190	Review, analyze and organize master lease agreements from CDSS production -- CDSS000904-002172	Discovery (Non-Deposition)
1/24/2022	Travis Close	1.4	\$850	\$1,190	Review, analyze and organize master lease agreements from CDSS production -- CDSS002172-0043003	Discovery (Non-Deposition)
1/25/2022	Mark Johnson	3.2	\$1,150	\$3,680	revise and add to draft document requests, set 8; email to AX and other COC e same	Discovery (Non-Deposition)
1/25/2022	Mark Johnson	1.0	\$1,150	\$1,150	revise and comment on draft rogs re corporate connections, hiring responsibilities, etc.	Discovery (Non-Deposition)
1/25/2022	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re mtc plans of operation	Discovery (Non-Deposition)
1/25/2022	Mark Johnson	0.5	\$1,150	\$575	call w/ J Yellin re potential mtc re plans of operation	Other Motions
1/25/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising AXW draft declaration	Class Certification
1/25/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising SLS draft declaration	Class Certification
1/25/2022	Rachel Steyer	0.6	\$750	\$450	communications with RDR, PXM, AXW, SLS, GSL concerning status of outreach efforts and draft declarations	Class Certification
1/25/2022	Rachel Steyer	3.5	\$750	\$2,625	reviewing 30b6 topic 11 depo transcript to identify excerpts where witness could not answer questions w/in scope of depo topic	Depositions
1/25/2022	Rachel Steyer	1.0	\$750	\$750	partial review of 30b6 topic 2 depo transcript for areas where deponent did not know answers to quesitons within scope of topic	Depositions
1/25/2022	Travis Close	0.3	\$850	\$255	Call with JIK re: final revisions to errata sheet	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/25/2022	Travis Close	0.7	\$850	\$595	Further edits to Kailes errata and responses to concerns in email	Experts (Including Retention)
1/26/2022	Mark Johnson	0.3	\$1,150	\$345	review D edits to joint ltr brief on RFPs 10, 11, set 6. email to COC re same.	Other Motions
1/26/2022	Rachel Steyer	0.7	\$750	\$525	editing and drafting KGJ draft class member declarations	Class Certification
1/26/2022	Rachel Steyer	0.5	\$750	\$375	editing and revising SLS draft class member declaration	Class Certification
1/26/2022	Rachel Steyer	0.3	\$750	\$225	call with client to discuss updates and reschedule time to continue intake	Class Outreach and Contact
1/26/2022	Rachel Steyer	0.4	\$750	\$300	received follow up call from family member of former resident, discussed case, rescheduled intake call	Class Outreach and Contact
1/26/2022	Rachel Steyer	0.2	\$750	\$150	reviewing and editing GSL letter to class member providing more information about case as requested	Class Outreach and Contact
1/26/2022	Rachel Steyer	0.2	\$750	\$150	reviewing intake completed by DMS	Class Outreach and Contact
1/26/2022	Rachel Steyer	0.2	\$750	\$150	communications on teams with KGJ, DMS, GSL, RDR concerning outreach and declaration drafting efforts	Class Outreach and Contact
1/26/2022	Rachel Steyer	0.2	\$750	\$150	reviewing email from co-counsel summarizing depo of named plaintiff	Depositions
1/26/2022	Rachel Steyer	2.6	\$750	\$1,950	continuing review of 30b6 depo transcript to identify excerpts of testimony where witness did not know answers to questions as PMK	Depositions
1/26/2022	Rachel Steyer	0.2	\$750	\$150	reviewing esi production to look for relevant documents corresponding to likely declarant	Discovery (Non-Deposition)
1/26/2022	Rachel Steyer	0.3	\$750	\$225	reviewing production for relevant documents corresponding to likely declarant	Discovery (Non-Deposition)
1/26/2022	Rachel Steyer	0.3	\$750	\$225	reviewing defendants' section of joint discovery letter brief as circulated by opposing counsel	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/26/2022	Travis Close	1.3	\$850	\$1,105	Begin drafting joint letter brief re: list of facility transportation vehicles (Outline)	Communications With Opposing Counsel
1/26/2022	Travis Close	0.5	\$850	\$425	Legal research re: administrative motions: time for responding to administrative motions, max length, structure, etc.	Discovery (Non-Deposition)
1/26/2022	Travis Close	0.2	\$850	\$170	Review and analyze Def's motion for admin relief to consolidate/expand page limits	Discovery (Non-Deposition)
1/26/2022	Travis Close	0.2	\$850	\$170	Email to MTJ re: judge's order on motion for admin relief	Discovery (Non-Deposition)
1/26/2022	Travis Close	0.1	\$850	\$85	Review and analyze judge gilliam's order on motion for admin relief	Discovery (Non-Deposition)
1/26/2022	Travis Close	0.2	\$850	\$170	Review and analyze noes by BBK re: ralph carlson deposition	Discovery (Non-Deposition)
1/26/2022	Travis Close	1.1	\$850	\$935	Legal research re: standards for judicial economy in motion for expend page limits	Misc. Research
1/27/2022	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re letter from Jacobsen regarding outreach to class members & response thereto	Class Certification
1/27/2022	Mark Johnson	2.3	\$1,150	\$2,645	draft response to D letter re resident communications	Discovery (Non-Deposition)
1/27/2022	Mark Johnson	0.2	\$1,150	\$230	call w/ RLS re ltr from OC re communications with class reps	Discovery (Non-Deposition)
1/27/2022	Rachel Steyer	0.7	\$750	\$525	conducted final read through call with declarant	Class Certification
1/27/2022	Rachel Steyer	0.3	\$750	\$225	editing and finalizing draft declaration for SLS	Class Certification
1/27/2022	Rachel Steyer	0.2	\$750	\$150	email to outreach team with updated declaration template and further instructions	Class Certification
1/27/2022	Rachel Steyer	0.2	\$750	\$150	call with MTJ to discuss opposing counsel letter re class outreach	Class Outreach and Contact
1/27/2022	Rachel Steyer	0.2	\$750	\$150	response to GBW, MTJ, and co-counsel concerning outreach efforts and protocols	Class Outreach and Contact
1/27/2022	Rachel Steyer	0.3	\$750	\$225	call with TRB to update him about status to outreach efforts	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/27/2022	Rachel Steyer	0.6	\$750	\$450	communications on teams with outreach team to discuss outreach efforts	Class Outreach and Contact
1/27/2022	Rachel Steyer	3.0	\$750	\$2,250	reviewing 30b6 depo to continue to identify issues with witness not knowinhg answers to questions within scope of topic	Depositions
1/27/2022	Travis Close	0.2	\$850	\$170	Review and analyze Def's letter alleging violations of stip re class outerach & attached voicemail	Class Outreach and Contact
1/27/2022	Travis Close	0.2	\$850	\$170	Review and analyze stip re: communications with class members in light of Def's letter	Class Outreach and Contact
1/27/2022	Travis Close	0.3	\$850	\$255	Review and analyze final draft of joint letter re: employees to provide direct care & corrective action plans	Discovery (Non-Deposition)
1/28/2022	Guy Wallace	0.4	\$1,350	\$540	revise and edit draft letter from MTJ to Maatman re class outreach	Communications With Opposing Counsel
1/28/2022	Mark Johnson	0.5	\$1,150	\$575	review and propose edits to declaration of resident's daughter, com via email w/ RLS re same	Class Certification
1/28/2022	Mark Johnson	0.3	\$1,150	\$345	email exchanges w/ RLS re instructions going forward for contact with class members and class reps	Class Certification
1/28/2022	Mark Johnson	0.1	\$1,150	\$115	call w/ client Stiner re Errata for depo	Depositions
1/28/2022	Mark Johnson	0.1	\$1,150	\$115	review Kailes Errata	Depositions
1/28/2022	Mark Johnson	0.9	\$1,150	\$1,035	review form letter for outreach to residents and make revisions to same; review website for case.	Discovery (Non-Deposition)
1/28/2022	Mark Johnson	0.4	\$1,150	\$460	revise ltr to OC re resident contacts based on input from COC; finaiize and send to OC	Discovery (Non-Deposition)
1/28/2022	Mark Johnson	0.1	\$1,150	\$115	review ltr from oc re expert disclosures	Experts (Including Retention)
1/28/2022	Rachel Steyer	0.9	\$750	\$675	call with KGJ to review questions about draft declarations and discuss general outreach protocols	Class Certification
1/28/2022	Rachel Steyer	0.4	\$750	\$300	call with possible declarant to review draft declaration	Class Certification
1/28/2022	Rachel Steyer	1.1	\$750	\$825	call with declarant to discuss and review clarifications in draft declaration	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/28/2022	Rachel Steyer	0.5	\$750	\$375	editing and revising SLS draft declaration	Class Certification
1/28/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising KGJ draft declaration	Class Certification
1/28/2022	Rachel Steyer	0.3	\$750	\$225	response to MTJ, TCC, GBW, TRB and co-counsel concerning updating Brookdale website and revising class mailer	Class Outreach and Contact
1/28/2022	Rachel Steyer	0.5	\$750	\$375	drafting updated and revised letter to class members seeking additional information	Class Outreach and Contact
1/28/2022	Rachel Steyer	0.2	\$750	\$150	communications on teams with outreach team to discuss outreach protocols	Class Outreach and Contact
1/28/2022	Rachel Steyer	1.0	\$750	\$750	continued to review 30b6 depo topic 2 transcript and identify lack of responsive answers	Depositions
1/28/2022	Rachel Steyer	0.3	\$750	\$225	re-searching production for documents corresponding to declarant	Discovery (Non-Deposition)
1/28/2022	Travis Close	0.6	\$850	\$510	Analyze testimony from kevin bowman in deposition re: Brookdale's access to list of facility vehicles (Joint letter brief, RFP No. 8, set six)	Case Organization, Planning and Strategy
1/28/2022	Travis Close	0.4	\$850	\$340	Email to RLS re: history of decision to have different letters for memory care residents	Class Outreach and Contact
1/28/2022	Travis Close	1.5	\$850	\$1,275	Review and analyze prior correspondence re: how to differentiate between AL and memory care residents in class outreach letters; mental capacity issue	Class Outreach and Contact
1/28/2022	Travis Close	0.2	\$850	\$170	Review and analyze revised template for class member outreach letter	Class Outreach and Contact
1/28/2022	Travis Close	0.3	\$850	\$255	Email to LEC re: signed errata sheet of June Kailes and instructions for dissemination	Depositions
1/28/2022	Travis Close	0.5	\$850	\$425	Review and analyze testimony from prior discovery hearing re: which types of new discovery would be allowed	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/28/2022	Travis Close	0.5	\$850	\$425	Analyze testimony from kevin bowman in Doug Cross deposition re: whether analysis of individual vehicle specifications is required to determine compliance	Depositions
1/28/2022	Travis Close	0.2	\$850	\$170	Review and analyze discovery deficiency letter from defense counsel	Discovery (Non-Deposition)
1/28/2022	Travis Close	0.2	\$850	\$170	Email to JY (co-counsel) re following up with defendants about discovery not produced	Discovery (Non-Deposition)
1/28/2022	Travis Close	1.5	\$850	\$1,275	Continue drafting joint letter brief re: list of facility vehicles	Discovery (Non-Deposition)
1/31/2022	Guy Wallace	0.3	\$1,350	\$405	review and analysis of draft letter re class outreach; com's with RLS re same	Class Certification
1/31/2022	Mark Johnson	0.8	\$1,150	\$920	zoom call w/ corporate experts Solomon and Tran and with COC GCG and AX re additional documents necessary analysis of ownership issue for reply and revisions to proposed draft RFPs	Class Certification
1/31/2022	Mark Johnson	0.8	\$1,150	\$920	call w/ G Waters and TCC re new construction analysis and preparation of table for supplemental RFP responses re same	Discovery (Non-Deposition)
1/31/2022	Mark Johnson	0.4	\$1,150	\$460	call w/ AX re draft RFPs for docs necessary for corporate expert analysis - pre call for call w/ Solomon and Tran	Discovery (Non-Deposition)
1/31/2022	Rachel Steyer	0.4	\$750	\$300	call with SLS to discuss and review draft declaration	Class Certification
1/31/2022	Rachel Steyer	0.6	\$750	\$450	editing and revising GSL draft declaration	Class Certification
1/31/2022	Rachel Steyer	0.3	\$750	\$225	call with KGJ to discuss questions about draft declarations	Class Certification
1/31/2022	Rachel Steyer	1.0	\$750	\$750	drafting and reorganizing RVR draft declaration following earlier conversation with declarant	Class Certification
1/31/2022	Rachel Steyer	0.5	\$750	\$375	editing and revising DMS draft declaration	Class Certification
1/31/2022	Rachel Steyer	0.2	\$750	\$150	reviewing GSL intake of potential declarant	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/31/2022	Rachel Steyer	0.5	\$750	\$375	communications on teams with DMS, RVR, KGJ, SLS, PXM, GSL concerning outreach and declaration questions	Class Outreach and Contact
1/31/2022	Rachel Steyer	0.5	\$750	\$375	reviewing documents, updating supplemental initial disclosures	Discovery (Non-Deposition)
1/31/2022	Travis Close	0.2	\$850	\$170	Email to MTJ re: questions for corporations experts	Case Organization, Planning and Strategy
1/31/2022	Travis Close	1.2	\$850	\$1,020	Further revisions to table insert for supp responses to Schmidt 2nd set for ROGs	Discovery (Non-Deposition)
1/31/2022	Travis Close	0.8	\$850	\$680	Call with Gary Waters, MTJ re: further revisions to table insert for Supp ROG responses and construction history binder	Discovery (Non-Deposition)
1/31/2022	Travis Close	0.7	\$850	\$595	Legal research re: alter ego analysis for establishing liability under ADA	Discovery (Non-Deposition)
1/31/2022	Travis Close	0.2	\$850	\$170	Email to MTJ re: call today with gary waters on construction history binder	Experts (Including Retention)
1/31/2022	Travis Close	0.7	\$850	\$595	Prep for call with Gary Waters, MTJ re: construciton history responses (review notes from last call, prior communications, and determine further action necessary)	Experts (Including Retention)
1/31/2022	Travis Close	1.6	\$850	\$1,360	Further edits, revisions, and cleaning up of construction history chart, with REDLINE and CLEAN versions of final; send to MTJ and GBW for review	Experts (Including Retention)
2/1/2022	Mark Johnson	0.1	\$1,150	\$115	call w/ AX re revised rfps and rogs on corporate issue.	Discovery (Non-Deposition)
2/1/2022	Mark Johnson	0.3	\$1,150	\$345	review and draft response to 2 emails from OC Maatman re Kailes docs, supp responses to Schmidt rog, alleged communications with deponents during depositions.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/1/2022	Mark Johnson	0.2	\$1,150	\$230	email exchanges w/ COC re D accusations of communication w/ deponents during depositions	Discovery (Non-Deposition)
2/1/2022	Mark Johnson	0.2	\$1,150	\$230	preliminary review of draft section of joint letter re transportation fleet	Other Motions
2/1/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising KGJ draft declaration	Class Certification
2/1/2022	Rachel Steyer	0.5	\$750	\$375	received call back from family member, discussed case, scheduled follow up call for next week	Class Outreach and Contact
2/1/2022	Rachel Steyer	0.4	\$750	\$300	received call back from family member of current resident, discussed case, indicated that he wanted to think about it and would call back	Class Outreach and Contact
2/1/2022	Rachel Steyer	0.3	\$750	\$225	call back with family member of current resident, discussed case, said she was oging to review complaint and then call back	Class Outreach and Contact
2/1/2022	Rachel Steyer	2.1	\$750	\$1,575	conducted partial intake with former resident and daughter	Class Outreach and Contact
2/1/2022	Rachel Steyer	0.5	\$750	\$375	communications on teams with TRB, RDR, DMS, SLS, KGJ, GSL concerning outreach protocols	Class Outreach and Contact
2/1/2022	Rachel Steyer	1.3	\$750	\$975	completing review of 30b6 depo topic 2 to identify problematic answers of witness	Depositions
2/1/2022	Rachel Steyer	0.7	\$750	\$525	reviewing 30b6 depo transcript of topic 5 to identify issues with witness answering questions within scope of topic	Depositions
2/1/2022	Rachel Steyer	0.6	\$750	\$450	reviewing production for documents correspondign to potential new declarant	Discovery (Non-Deposition)
2/1/2022	Travis Close	0.2	\$850	\$170	Email to MTJ, GBW re: joint letter briefs for consideration while awating defendants' response	Case Organization, Planning and Strategy
2/1/2022	Travis Close	0.7	\$850	\$595	Analyze docs found by JMP regarding Michael Johnson, director of the Fleet department, and his responsibilities for managing transportation at CA Brookdale facilities	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/1/2022	Travis Close	1.6	\$850	\$1,360	Continue drafting joint letter brief re: facility vehicles	Discovery (Non-Deposition)
2/1/2022	Travis Close	0.8	\$850	\$680	Review and analyze recent facility evaluation reports and complaint investigation reports issued for North Fremont, Clairemont, San Marcos, Riverwalk, Walnut, Auburn, Oceanside, and Tracy facilities	Discovery (Non-Deposition)
2/1/2022	Travis Close	1.2	\$850	\$1,020	Preliminary reiew and analysis of draft management agreements, lease agreements, operations agreements, and amendments in lasted Brookdale production (BKD2953382-BKD2956710)	Discovery (Non-Deposition)
2/2/2022	Guy Wallace	0.3	\$1,350	\$405	com's with RLS re class outreach, letter to putative class members	Class Certification
2/2/2022	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ; RLS re class outreach; resident files; residency agreements	Class Certification
2/2/2022	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re preparation for 2/3 hearing with MJ Beeler; com's with OC re issues re class outreach	Discovery (Non-Deposition)
2/2/2022	Mark Johnson	0.6	\$1,150	\$690	teams call w/ GBW, RLS re changes in outreach strategy, template letter for same, voice mail script, D's accusations of failure to abide by order re communications and web site.	Class Certification
2/2/2022	Mark Johnson	0.2	\$1,150	\$230	com w/ former resident daughter re residency agreement, resident file and declaration	Class Certification
2/2/2022	Mark Johnson	0.3	\$1,150	\$345	call w/ TCC re preparation of chart summarizing management and lease agreements and draft joint discovery letter re fleet inventory	Discovery (Non-Deposition)
2/2/2022	Mark Johnson	1.8	\$1,150	\$2,070	review and make revisions to RFPs and draft revisions to and restructuring of proposed rogs to OC for corporate identity issues; email exchange w/ COC AX re same.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/2/2022	Mark Johnson	2.7	\$1,150	\$3,105	research multiple sources to identify relevant subsidiaries for identification in RFPs and prepare appendix to RFPs based on same, email to COC (.1) re same	Discovery (Non-Deposition)
2/2/2022	Mark Johnson	0.5	\$1,150	\$575	meet and confer w/ OC Jacobsen and Riley re threatened motion to prevent communication with residents	Other Motions
2/2/2022	Mark Johnson	0.3	\$1,150	\$345	call w/ D Marks re scope of employee data for staffing analysis and possible compromise positions on mtn to compel identifying data for trained non-caregiver staff.	Other Motions
2/2/2022	Mark Johnson	0.1	\$1,150	\$115	call w/ J Yellin re hearing on mtc docs re service alignment discipline records and data identifying non-caregiving staff trained to provide care.	Other Motions
2/2/2022	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW re results of meet and confer on D demand to cease communications with witnesses and on mtc hearing re discipline docs and data identifying non-caregiving staff trained to provide care	Other Motions
2/2/2022	Mark Johnson	1.0	\$1,150	\$1,150	prep for hearing on MTC re identification of Ds non-care-giving staff trained to provide care	Other Motions
2/2/2022	Rachel Steyer	0.2	\$750	\$150	response to GSL answering questions about declaration comments	Class Certification
2/2/2022	Rachel Steyer	0.5	\$750	\$375	editing and revising SLS draft declaration	Class Certification
2/2/2022	Rachel Steyer	0.5	\$750	\$375	editing and revising KGJ draft declarations	Class Certification
2/2/2022	Rachel Steyer	0.3	\$750	\$225	call with GBW to discuss outreach issues	Class Outreach and Contact
2/2/2022	Rachel Steyer	0.2	\$750	\$150	drafting language in outreach script about discussions of arbitration	Class Outreach and Contact
2/2/2022	Rachel Steyer	0.2	\$750	\$150	reviewing RDR intake to evaluate for possible declaration	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/2/2022	Rachel Steyer	0.6	\$750	\$450	meeting with GBW and MTJ to discuss and review outstanding outreach items	Class Outreach and Contact
2/2/2022	Rachel Steyer	0.3	\$750	\$225	communicatinos on teams with TRB, DMS, RDR, KGJ concerning outreach and declarations	Class Outreach and Contact
2/2/2022	Rachel Steyer	1.4	\$750	\$1,050	reviewing topic 5 depo transcript to identify issues with non responsive answers	Depositions
2/2/2022	Rachel Steyer	0.3	\$750	\$225	reviewing production to identify relevant documents for potential declarant	Discovery (Non-Deposition)
2/2/2022	Rachel Steyer	1.5	\$750	\$1,125	reviewing defendants' production of declarant records and documents	Discovery (Non-Deposition)
2/2/2022	Travis Close	0.4	\$850	\$340	Call with MTJ re: corporate entity expert assignment	Case Organization, Planning and Strategy
2/2/2022	Travis Close	1.4	\$850	\$1,190	Legal research re: cases in ninth circuit interpreting impact of TransUnion case on CLRA cases	Class Certification
2/2/2022	Travis Close	0.7	\$850	\$595	Review, analyze, and revise draft reply dec of Cheryl Frank iso Ps motion for class cert	Class Outreach and Contact
2/2/2022	Travis Close	0.5	\$850	\$425	Abalyze results for "BKD Twenty-One Management Company" under asset management custodian David Hammonds	Discovery (Non-Deposition)
2/2/2022	Travis Close	0.6	\$850	\$510	Review and analyze response by Ps' experts to request for additional docs re: staffing analysis & docs included (FLORES0017, FLORES0018, MEDMODEL0028)	Experts (Including Retention)
2/2/2022	Travis Close	1.3	\$850	\$1,105	Analyze prior communications with June Kailes for possible drafts of notes that need to be shared with Defs	Misc. Research
2/3/2022	Guy Wallace	0.5	\$1,350	\$675	review and analysis of MJ Beeler Order re MTC re training re direct care; enforcement of benchmarks; com's with MTJ re same	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/3/2022	Mark Johnson	0.4	\$1,150	\$460	review tracking logs and file folders for depo transcripts and exhibits and draft email instructions to LEC re managing same	Case Organization, Planning and Strategy
2/3/2022	Mark Johnson	0.5	\$1,150	\$575	calls and emails with daughter of former resident re declaration, request for agreement and other documents, authorization & release	Class Certification
2/3/2022	Mark Johnson	0.9	\$1,150	\$1,035	review, edit and finalize table of new construction facilities and facts and docs for supp responses to Schmidt rog, edit and finalize responses; email to COC re same and to OC re responses and intended production of replacement construction history binders.	Discovery (Non-Deposition)
2/3/2022	Mark Johnson	0.3	\$1,150	\$345	call w/ Amy Xu re final issues and edits to eighth set of rfps and Vallette rogs	Discovery (Non-Deposition)
2/3/2022	Mark Johnson	1.3	\$1,150	\$1,495	heraring before MJ Beeler on discovery mtn RFP 10-11, set 6	Other Motions
2/3/2022	Mark Johnson	1.0	\$1,150	\$1,150	further prep for hearing on discovery mtn to compel RFP 10, 11, set 6	Other Motions
2/3/2022	Mark Johnson	0.3	\$1,150	\$345	call w GBW re hearing on mtn to compel	Other Motions
2/3/2022	Mark Johnson	0.1	\$1,150	\$115	review order on MTC RFP 10 and 11 set 6l email to OC re same	Other Motions
2/3/2022	Rachel Steyer	0.2	\$750	\$150	call with declarant to discuss preparing authorization forms to Brookdale, sending POA documentation	Class Certification
2/3/2022	Rachel Steyer	0.5	\$750	\$375	editing DMS draft declaration	Class Certification
2/3/2022	Rachel Steyer	0.2	\$750	\$150	communications on teams with TRB, DMS< GSL concernin outreach efforts	Class Outreach and Contact
2/3/2022	Rachel Steyer	2.6	\$750	\$1,950	finishing review of 30b6 topic 5 depo transcript fro instances of deponent not knowing answers to questions within scope of examination	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/3/2022	Rachel Steyer	0.2	\$750	\$150	reviewing production to identify documents corresponding to likely declarant	Discovery (Non-Deposition)
2/3/2022	Rachel Steyer	0.2	\$750	\$150	reviewing and organizing documents likely declarant provided, circulated by MTJ	Discovery (Non-Deposition)
2/3/2022	Rachel Steyer	0.4	\$750	\$300	reviewing latest defendant produvction of declarant resident files	Discovery (Non-Deposition)
2/3/2022	Travis Close	0.5	\$850	\$425	Email to EPO re: new assignment - corporate entity agreement analysis -- to establish BKD as operator	Case Organization, Planning and Strategy
2/3/2022	Travis Close	0.4	\$850	\$340	Review and analyze Ps' request for production of documents, set 8 and Plaintiff Jestrabek Hart's request for interrogatories set 1	Discovery (Non-Deposition)
2/3/2022	Travis Close	0.2	\$850	\$170	Call with MTJ re: finalizing table insert for ROG responses (Schmidt)	Discovery (Non-Deposition)
2/3/2022	Travis Close	1.2	\$850	\$1,020	Investigate SEC filings for Eric Mendelsohn (Senior VP of corporate development, Emeritus)	Discovery (Non-Deposition)
2/3/2022	Travis Close	1.3	\$850	\$1,105	Revisions to agreements ownership & data spreadsheet	Discovery (Non-Deposition)
2/3/2022	Travis Close	0.4	\$850	\$340	Review and analyze final version of Supp responses to second set of ROGs for P Schmidt; check for errors	Discovery (Non-Deposition)
2/3/2022	Travis Close	0.7	\$850	\$595	Further revisions to draft joint letter brief re: facility vehicles	Discovery (Non-Deposition)
2/3/2022	Travis Close	0.9	\$850	\$765	Revise/finalize construcion history binders for Mastin and Waters (v2) and prepare to send to Defs	Experts (Including Retention)
2/4/2022	Guy Wallace	1.0	\$1,350	\$1,350	prepare for and participate in team zoom with GG; JY; BBK; AX; KS; EH; BU; MTJ; TCC; RLS re preparation for class cert reply papers and discovery	Class Certification
2/4/2022	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re further motions to compel and subjects of same	Discovery (Non-Deposition)
2/4/2022	Guy Wallace	0.6	\$1,350	\$810	review and analysis of D's Daubert motions re Kailes; Cross; Mastin; Waters; com's with MTJ re same	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/4/2022	Rachel Steyer	0.9	\$750	\$675	biweekly strategy meeting with co-counsel to reivew and discuss ongoing plans and assignments	Case Organization, Planning and Strategy
2/4/2022	Rachel Steyer	0.7	\$750	\$525	editing and revising DMS draft declarations	Class Certification
2/4/2022	Rachel Steyer	0.5	\$750	\$375	editing and revising GSL draft declaration	Class Certification
2/4/2022	Rachel Steyer	1.0	\$750	\$750	editing and revising RDR draft declarations	Class Certification
2/4/2022	Rachel Steyer	0.2	\$750	\$150	communications on teams with TRB and GSL concerning outreach	Class Outreach and Contact
2/4/2022	Rachel Steyer	2.5	\$750	\$1,875	reviewing 30b6 depo transcript, topic 5, to identify instances when declarant failed to answer/did not know answers to questions within scope of examination	Depositions
2/4/2022	Rachel Steyer	0.5	\$750	\$375	beginning to review production to identify relevant search terms and individuals to look for central communications resolving billing issues	Discovery (Non-Deposition)
2/4/2022	Travis Close	1.0	\$850	\$850	Biweekly team meeting re: declarations, litigation strategy, defending daubert motions, etc	Case Organization, Planning and Strategy
2/4/2022	Travis Close	0.8	\$850	\$680	Review and analyze resident files recently produced for info re: complaints to Brookdale management and staff (Robert Arnhym, Mary Arsenian, Bruno Filice, Lucia Cibrian)	Discovery (Non-Deposition)
2/4/2022	Travis Close	1.2	\$850	\$1,020	Review and analyze Def's motion to exclude declaration of June Kailes	Experts (Including Retention)
2/4/2022	Travis Close	1.2	\$850	\$1,020	Legal research re: standards for admissibility in Daubert motions	Experts (Including Retention)
2/4/2022	Travis Close	1.6	\$850	\$1,360	Outline arguments for responding to Daubert motion on Kailes declaration	Experts (Including Retention)
2/4/2022	Travis Close	0.8	\$850	\$680	Review and analyze Def's motion to exclude declaration of Doug Cross + Exhibits	Experts (Including Retention)
2/6/2022	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re Daubert motions, proposed extension for responses, assignments for responses, merits	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/7/2022	Guy Wallace	0.5	\$1,350	\$675	review and analysis of D's Daubert motions and schedule re same; coms' with Marks re same	Other Motions
2/7/2022	Guy Wallace	1.7	\$1,350	\$2,295	review and analysis of D's Daubert motion re Dr. Flores; com's with MTJ re same (.4)	Other Motions
2/7/2022	Guy Wallace	0.3	\$1,350	\$405	com's with DTM; MTJ re D's motion to seal Daubert motions	Other Motions
2/7/2022	Rachel Steyer	0.5	\$750	\$375	editing and revising SLS draft declaration	Class Certification
2/7/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising DMS draft declaration	Class Certification
2/7/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising SLS draft declaration	Class Certification
2/7/2022	Rachel Steyer	0.5	\$750	\$375	call with SLS to review edits and changes to draft declaration	Class Certification
2/7/2022	Rachel Steyer	0.8	\$750	\$600	call with RDR to discuss and review draft declarations	Class Certification
2/7/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising GSL draft declaration	Class Certification
2/7/2022	Rachel Steyer	0.3	\$750	\$225	finalizing RDR draft declaration before sending for approval	Class Certification
2/7/2022	Rachel Steyer	0.3	\$750	\$225	communications on teams with RDR, SLS, DMS, AXW, GSL, JGK concerning outreach questions	Class Outreach and Contact
2/7/2022	Rachel Steyer	1.0	\$750	\$750	conducting document review and searches to look and identify documents illustrating corporate control over finances/residence credits	Discovery (Non-Deposition)
2/7/2022	Rachel Steyer	0.8	\$750	\$600	reviewing defendants' motion to exclude Cross declaration and testimony	Other Motions
2/7/2022	Rachel Steyer	0.4	\$750	\$300	reviewing defendants' administrative motion to file under seal documents ISO defendant's motion to exclude Flores declaration and testimony	Other Motions
2/7/2022	Travis Close	0.2	\$850	\$170	Email to GBW re: responding to Def's motion to strike declaration by June Kailes	Case Organization, Planning and Strategy
2/7/2022	Travis Close	0.2	\$850	\$170	Email to LEC re: sharing unredacted versions of expert declarations with co-counsel	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/7/2022	Travis Close	0.2	\$850	\$170	Email to EPO re: compiling floor plans for re-sending to staffing experts	Experts (Including Retention)
2/7/2022	Travis Close	0.4	\$850	\$340	Review and analyze dec of June Kailes iso motion for class cert (prep for opposition)	Experts (Including Retention)
2/7/2022	Travis Close	0.2	\$850	\$170	Email to James Thornton re: floor plans for staffing analysis	Experts (Including Retention)
2/7/2022	Travis Close	1.6	\$850	\$1,360	Continue drafting opposition to def's motion to exclude testimony by Kailes (argument: Kailes' methodology was reliable)	Experts (Including Retention)
2/7/2022	Travis Close	1.2	\$850	\$1,020	Continue drafting Daubert Opposition - Kailes (Arguments B and C)	Experts (Including Retention)
2/7/2022	Travis Close	1.8	\$850	\$1,530	Continue drafting opposition to def's motion to exclude testimony by Kailes (Outline)	Pleadings and Motions Re: Pleadings
2/8/2022	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of D's Daubert motion re Dr. Flores; legal research and analysis re same and D's contentions that "scientific certainty" are required	Other Motions
2/8/2022	Guy Wallace	0.2	\$1,350	\$270	com's with TCC re D's Daubert motions	Other Motions
2/8/2022	Guy Wallace	0.4	\$1,350	\$540	com's with Marks; MTJ re D's Daubert motions	Other Motions
2/8/2022	Guy Wallace	1.1	\$1,350	\$1,485	legal research and analysis re Judge Gilliam's decisions re Daubert motions; Defendants argument that case law requires a "hypothesis"	Other Motions
2/8/2022	Guy Wallace	2.3	\$1,350	\$3,105	review and analysis of Defendants' Daubert motion re Schroyer	Other Motions
2/8/2022	Mark Johnson	0.4	\$1,150	\$460	review spreadsheet analysis of D's production of resident files for declarants	Discovery (Non-Deposition)
2/8/2022	Rachel Steyer	0.3	\$750	\$225	call with DMS to review and discuss questions about draft declaration and intake	Class Certification
2/8/2022	Rachel Steyer	0.3	\$750	\$225	finalizing edits and revisions to DMS draft declaration	Class Certification
2/8/2022	Rachel Steyer	0.5	\$750	\$375	call with family member of recently deceased resident, discussed case, requested email	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/8/2022	Rachel Steyer	0.4	\$750	\$300	reviewing intake completed by GSL	Class Outreach and Contact
2/8/2022	Rachel Steyer	0.2	\$750	\$150	reviewing intake completed by DMS	Class Outreach and Contact
2/8/2022	Rachel Steyer	0.7	\$750	\$525	received call back from family member of current resident, discussed case, she said she wanted to think about it for a few days and will F/U next week	Class Outreach and Contact
2/8/2022	Rachel Steyer	0.2	\$750	\$150	communications on teams with RVR, DMS, KGJ, PXM concerning outreach efforts	Class Outreach and Contact
2/8/2022	Rachel Steyer	0.2	\$750	\$150	reviewing defendants' responses to plaintiffs ROGs, set one	Discovery (Non-Deposition)
2/8/2022	Rachel Steyer	4.5	\$750	\$3,375	reviewing latest defendant document production corresponding to declarants' records, preparing spreadsheet to track records	Discovery (Non-Deposition)
2/8/2022	Travis Close	1.2	\$850	\$1,020	Analyze testimony in Kailes deposition re: her processes for analyzing evac plans generally, and in this case (Daubert reply	Experts (Including Retention)
2/8/2022	Travis Close	0.2	\$850	\$170	Email to GBW re: analysis of case law in Sunrise brief for Daubert Kailes reply	Experts (Including Retention)
2/8/2022	Travis Close	0.8	\$850	\$680	Review and analyze scheduling order, N.D. CA local rules for info re: length, content, & time to file opposition to Daubert motions	Pleadings and Motions Re: Pleadings
2/8/2022	Travis Close	0.2	\$850	\$170	Call to GBW re: question about using Sunrise brief for Kailes Daubert reply	Pleadings and Motions Re: Pleadings
2/8/2022	Travis Close	0.9	\$850	\$765	Continue drafting opposition to Daubert motion for June Kailes -- Argument II.A (standard of review for court)	Pleadings and Motions Re: Pleadings
2/8/2022	Travis Close	1.8	\$850	\$1,530	Continue drafting opposition to Daubert motion for June Kailes -- Argument II.B(1) (Def's fail to challenge Kailes' process)	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/8/2022	Travis Close	1.2	\$850	\$1,020	Continue drafting opposition to Daubert motion for June Kailes -- Argument II.B(2) (Documents Reviewed by Ms. Kailes were Representative of the Policies and Procedures at issue)	Pleadings and Motions Re: Pleadings
2/9/2022	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re staffing analysis of further sample of facilities; missing data; benchmark compliance analysis & review and analysis of Sunrise class cert order re same	Class Certification
2/9/2022	Guy Wallace	1.3	\$1,350	\$1,755	review and analysis of Defendants' Daubert motions re Flores and Schroyer; preparation of notes and questions re same	Other Motions
2/9/2022	Guy Wallace	1.4	\$1,350	\$1,890	zoom with DTM; JT; BU; MTJ re Defendants' Daubert motions re Flores and Schroyer; implementation of Defendants' staffing benchmarks; further sample of facilities for staffing analysis	Other Motions
2/9/2022	Mark Johnson	1.3	\$1,150	\$1,495	call w/ COC Wallace, Umpierre, Thornton, Marks re issues and strategy for response to Daubert Motions for Flores and Schroyer	Other Motions
2/9/2022	Rachel Steyer	0.4	\$750	\$300	editing AXW draft declaration	Class Certification
2/9/2022	Rachel Steyer	0.6	\$750	\$450	editing and finalizing SLS draft declaration	Class Certification
2/9/2022	Rachel Steyer	0.6	\$750	\$450	editing draft RDR declaration	Class Certification
2/9/2022	Rachel Steyer	0.6	\$750	\$450	editing and revising AXW draft declaration	Class Certification
2/9/2022	Rachel Steyer	0.2	\$750	\$150	call with GSL to review questions about draft declaration comments	Class Outreach and Contact
2/9/2022	Rachel Steyer	0.2	\$750	\$150	reviewing KGJ completed intake	Class Outreach and Contact
2/9/2022	Rachel Steyer	0.4	\$750	\$300	communications on teams with SLS, RDR, RVR, DMS< GSL, KGJ, AXW concerning class outreach efforts	Class Outreach and Contact
2/9/2022	Rachel Steyer	0.8	\$750	\$600	reviewing production for documents corresponding to likely declarants	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/9/2022	Rachel Steyer	2.5	\$750	\$1,875	conducting document review to locate and analyze financial centralization	Discovery (Non-Deposition)
2/9/2022	Travis Close	0.3	\$850	\$255	Review and analyze Ds responses to ROGs by Bernie Jestrabek Hart, Set One	Discovery (Non-Deposition)
2/9/2022	Travis Close	1.4	\$850	\$1,190	Continue drafting opposition to daubert motion for june kailes (revised Outline)	Discovery (Non-Deposition)
2/9/2022	Travis Close	1.6	\$850	\$1,360	Continue drafting opposition to daubert motion for june kailes, argument B(2): Documents Reviewed by Ms. Kailes Were Sufficient for Her Analysis	Discovery (Non-Deposition)
2/9/2022	Travis Close	2.3	\$850	\$1,955	Legal research re: standard of review for admissibility of expert evidence at class certification	Other Motions
2/9/2022	Travis Close	1.5	\$850	\$1,275	Continue drafting opposition to daubert motion for june kailes, argument B(1): Brookdale Has Failed to Challenge the Processes Followed by June Kailes In This Case	Pleadings and Motions Re: Pleadings
2/9/2022	Travis Close	0.2	\$850	\$170	Review and analyze def's motion to consider whether Ps material should be sealed	Pleadings and Motions Re: Pleadings
2/10/2022	Guy Wallace	1.2	\$1,350	\$1,620	legal research and analysis re Daubert and "cherry picked" data or factual analysis	Other Motions
2/10/2022	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ re schedule on Daubert oppositions	Other Motions
2/10/2022	Mark Johnson	2.6	\$1,150	\$2,990	draft mtn for enlarging time to file response to Daubert motions.	Other Motions
2/10/2022	Rachel Steyer	0.5	\$750	\$375	editing and revising GSL draft declaration	Class Certification
2/10/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising AXW draft declaration	Class Certification
2/10/2022	Rachel Steyer	0.7	\$750	\$525	editing and revising SLS draft declaration	Class Certification
2/10/2022	Rachel Steyer	0.3	\$750	\$225	editing and finalizing DRD draft declaration	Class Certification
2/10/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising GSL draft declaration	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/10/2022	Rachel Steyer	0.6	\$750	\$450	communications on teams with DMS, RDR, GSL, KGJ, AXW concerning outreach efforts	Class Outreach and Contact
2/10/2022	Rachel Steyer	2.8	\$750	\$2,100	completing review of 30b6 depo topic 5 transcript to identify excerpts where deponent did not know answers to questions within scope of testimony	Depositions
2/10/2022	Travis Close	0.2	\$850	\$170	Call to jim thorton (staffing expert) re: floor plans requested	Case Organization, Planning and Strategy
2/10/2022	Travis Close	0.2	\$850	\$170	email to EPO re: additional floor plans needed to be sent to staffing experts	Discovery (Non-Deposition)
2/10/2022	Travis Close	0.8	\$850	\$680	Review and analyze list of Bates numbers/floor plans highlighted by co-counsel re: additional docs needed for analysis	Discovery (Non-Deposition)
2/10/2022	Travis Close	1.1	\$850	\$935	Continue drafting Opposition to Mtn to exclude Kailes declaration (B.4 - Kailes' Analysis Is Not Undercut by Facility Variation)	Discovery (Non-Deposition)
2/10/2022	Travis Close	1.4	\$850	\$1,190	Legal research re: whether Title III of ADA applies broadly to areas outside of specified statutory text	Pleadings and Motions Re: Pleadings
2/10/2022	Travis Close	1.6	\$850	\$1,360	Continue drafting Opposition to Mtn to exclude Kailes declaration (B.3 - Ms. Kailes' Conclusions Are Supported by Substantial Evidence)	Pleadings and Motions Re: Pleadings
2/10/2022	Travis Close	1.2	\$850	\$1,020	Continue drafting Opposition to Mtn to exclude Kailes declaration (B.5 Ms. Kailes' Opinions are Clearly Explained in Her Declaration)	Pleadings and Motions Re: Pleadings
2/10/2022	Travis Close	1.0	\$850	\$850	Continue drafting Opposition to Mtn to exclude Kailes declaration (C. MS KAILES' TESTIMONY HAS NEVER BEEN EXCLUDED BY A COURT AND SHOULD ALSO BE ADMITTED IN THIS CASE)	Pleadings and Motions Re: Pleadings
2/11/2022	Guy Wallace	0.5	\$1,350	\$675	revise and edit draft motion pursuant to Local Rule 6 to enlarge time to respond to Defendants' 6 Daubert motions; com's with MTJ re same	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/11/2022	Guy Wallace	0.5	\$1,350	\$675	review and analysis of motion for extension of time re Defendants' Daubert motions; com's with MTJ re same	Other Motions
2/11/2022	Mark Johnson	0.2	\$1,150	\$230	call w/ RLS re additional declarations for reply on class cert motion, D's production of resident files.	Discovery (Non-Deposition)
2/11/2022	Mark Johnson	0.2	\$1,150	\$230	draft email to OC re failure to produce resident files, results of review of same	Discovery (Non-Deposition)
2/11/2022	Mark Johnson	6.5	\$1,150	\$7,475	work on admin mtn to extend time for response to Daubert motions; draft declaration iso same and proposed order, research record for citations, including identification of past modifications of time; incorporate edits from COC, com w LEC re filing.	Other Motions
2/11/2022	Mark Johnson	0.1	\$1,150	\$115	call w/ TCC re draft opposition to motion to exclude Kailes declaration	Other Motions
2/11/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising SLS draft declaration	Class Certification
2/11/2022	Rachel Steyer	0.2	\$750	\$150	call with MTJ to review and discuss status of declarant records, productions, and declarations	Class Certification
2/11/2022	Rachel Steyer	0.4	\$750	\$300	received call back from family member of former resident, discussed case, will conduct follow up call next week	Class Outreach and Contact
2/11/2022	Rachel Steyer	0.2	\$750	\$150	communications on teams with DMS, GSL, AXW concerning outreach efforts	Class Outreach and Contact
2/11/2022	Rachel Steyer	0.7	\$750	\$525	reviewing production for documents corresponding to former resident in preparation for follow up call with family member	Discovery (Non-Deposition)
2/11/2022	Travis Close	0.2	\$850	\$170	Call with MTJ re: assignments for next week	Discovery (Non-Deposition)
2/11/2022	Travis Close	0.3	\$850	\$255	Meet with SLG re: strategy for daubert opposition motions	Experts (Including Retention)
2/11/2022	Travis Close	2.2	\$850	\$1,870	Review and analyze Daubert Motion for Doug Cross & begin drafting outline for Opposiiton	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/11/2022	Travis Close	1.1	\$850	\$935	Continue drafting Opposition to motion to Exclude Kailes (introduction)	Pleadings and Motions Re: Pleadings
2/11/2022	Travis Close	0.9	\$850	\$765	Continue drafting Opposition to motion to Exclude Kailes (standard of review)	Pleadings and Motions Re: Pleadings
2/11/2022	Travis Close	0.8	\$850	\$680	Finalize first draft of Kailes opposition; send to MTJ, GBW for review	Pleadings and Motions Re: Pleadings
2/11/2022	Travis Close	0.3	\$850	\$255	Call with MTJ re: strategy for timing of daubert opposition motions	Pleadings and Motions Re: Pleadings
2/11/2022	Travis Close	0.2	\$850	\$170	Email to MTJ, GBW re: draft of Kailes Daubert opposition	Pleadings and Motions Re: Pleadings
2/11/2022	Travis Close	0.4	\$850	\$340	Review and analyze draft motion for admin relief & attached declaration for spelling/grammar issue	Pleadings and Motions Re: Pleadings
2/14/2022	Mark Johnson	1.8	\$1,150	\$2,070	review and propose edits to and comments on reply decs iso class certification; coms w/ RLS and GBW re same	Class Certification
2/14/2022	Mark Johnson	3.2	\$1,150	\$3,680	work on joint letter brief for benchmark formula; review transcripts of depositions for same	Other Motions
2/14/2022	Rachel Steyer	0.6	\$750	\$450	reviewing and finalizing declaration before sending to declarant for signature	Class Certification
2/14/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising DMS draft declaration	Class Certification
2/14/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising SLS draft declaration	Class Certification
2/14/2022	Rachel Steyer	0.9	\$750	\$675	reviewing and incorporating MTJ edits into draft declarations	Class Certification
2/14/2022	Rachel Steyer	0.6	\$750	\$450	received call from family member of current resident, discussed case and plans to follow up	Class Outreach and Contact
2/14/2022	Rachel Steyer	0.2	\$750	\$150	communications on teams with SLS, DMS, RVR, KGJ, GSL concerning outreach and declaration questions	Class Outreach and Contact
2/14/2022	Rachel Steyer	0.6	\$750	\$450	reviewing production for documents corresponding to potential declarants	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/14/2022	Rachel Steyer	0.4	\$750	\$300	preparing declarant authorization release forms	Discovery (Non-Deposition)
2/14/2022	Rachel Steyer	0.4	\$750	\$300	reviewing produciton for relevant financial documents to establish corporate control	Discovery (Non-Deposition)
2/14/2022	Rachel Steyer	0.7	\$750	\$525	reviewing memo circulated by co-counsel concerning defendant ownership/alter ego issues	Misc. Research
2/14/2022	Travis Close	0.8	\$850	\$680	Legal research re alter ego liability / ADA	Case Organization, Planning and Strategy
2/14/2022	Travis Close	0.6	\$850	\$510	Call with AXU re: corporate entity research and strategu	Case Organization, Planning and Strategy
2/14/2022	Travis Close	1.4	\$850	\$1,190	Legal research re: CLRA/Elder abuse cases where alter ego/corporate veil issue was litigated	Case Organization, Planning and Strategy
2/14/2022	Travis Close	0.2	\$850	\$170	Email to LEC re: final depo transcript needed for Doug Cross	Case Organization, Planning and Strategy
2/14/2022	Travis Close	0.2	\$850	\$170	Email to AXU re: meeting to discuss corporations expert/alter ego	Case Organization, Planning and Strategy
2/14/2022	Travis Close	0.8	\$850	\$680	Legal research re: alter ego cases where parent is in control of subsidiary	Case Organization, Planning and Strategy
2/14/2022	Travis Close	1.7	\$850	\$1,445	Depo summary of Doug Cross -- pages 65-127 (part I)	Depositions
2/14/2022	Travis Close	0.2	\$850	\$170	Email to RAB re: sending updated mastin and waters binders to defendants	Discovery (Non-Deposition)
2/14/2022	Travis Close	1.2	\$850	\$1,020	Depo summary of Doug Cross -- pages 1-65 (part I)	Experts (Including Retention)
2/15/2022	Guy Wallace	0.4	\$1,350	\$540	review and analysis of draft class cert reply declarations; com's with MTJ re same	Class Certification
2/15/2022	Mark Johnson	2.4	\$1,150	\$2,760	review declarations from class members and witnesses and provide edits, comments, feedback to RLS	Class Certification
2/15/2022	Mark Johnson	0.3	\$1,150	\$345	review D opp to request for continuance to oppose Daubert motions; com w/ GBW re same	Other Motions
2/15/2022	Rachel Steyer	0.2	\$750	\$150	reviewing and incorporating MTJ edits into draft declaration	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/15/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising draft DMS declaration	Class Certification
2/15/2022	Rachel Steyer	0.5	\$750	\$375	reviewing and incorporating MTJ edits into draft declaration, including reviewing access expert's facility report	Class Certification
2/15/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising DMS draft declaration	Class Certification
2/15/2022	Rachel Steyer	0.2	\$750	\$150	reviewing DMS completed intake for potential declaration	Class Outreach and Contact
2/15/2022	Rachel Steyer	0.6	\$750	\$450	received call back from family member of current resident, discussed case, interested in intake	Class Outreach and Contact
2/15/2022	Rachel Steyer	0.4	\$750	\$300	received call back from family member of current resident, discussed case	Class Outreach and Contact
2/15/2022	Rachel Steyer	0.3	\$750	\$225	follow up call with family member of current resident to discuss status of residency agreement/arbitration	Class Outreach and Contact
2/15/2022	Rachel Steyer	0.6	\$750	\$450	communications on teams with DMS, KGJ, GSL concerning outreach	Class Outreach and Contact
2/15/2022	Rachel Steyer	0.4	\$750	\$300	reviewing production for documents corresponding to potential declarant	Discovery (Non-Deposition)
2/15/2022	Rachel Steyer	0.3	\$750	\$225	call with co-counsel to review and discuss research project into financial docs	Discovery (Non-Deposition)
2/15/2022	Rachel Steyer	1.4	\$750	\$1,050	reviewing financial documents to identify corporate centralized documents	Discovery (Non-Deposition)
2/15/2022	Travis Close	0.7	\$850	\$595	Review and analyze recent facility evaluation reports and complaint investigation reports issued for North Tarzana, Napa, Kettleman Lane, Clairemont, Tracy, and Windsor facilities	Case Organization, Planning and Strategy
2/15/2022	Travis Close	0.2	\$850	\$170	Email to EPO re: additional floor plans located for staffing experts	Case Organization, Planning and Strategy
2/15/2022	Travis Close	0.3	\$850	\$255	Email to JGT re: additional floor plans located for former brookdale facilities to use in staffing analysis	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/15/2022	Travis Close	1.5	\$850	\$1,275	Depo summary - Doug Cross depo, part II (page 1-65)	Depositions
2/15/2022	Travis Close	2.2	\$850	\$1,870	Legal research re: permissibility of legal conclusions in expert testimony	Experts (Including Retention)
2/15/2022	Travis Close	1.4	\$850	\$1,190	Continue drafting Daubert opposition brief of Doug Cross (Intro and Background)	Experts (Including Retention)
2/16/2022	Guy Wallace	0.6	\$1,350	\$810	review and analysis of spreadsheets from Marks re comparisons of benchmarks to actual staffing; positions included in staffing analysis; com's with JT; MTJ re same	Misc. Research
2/16/2022	Guy Wallace	0.5	\$1,350	\$675	legal research and analysis re Defendants' Daubert motions	Other Motions
2/16/2022	Mark Johnson	0.4	\$1,150	\$460	research re Central Application Unit/Bureau of DSS re role and responsibilities for potential subpoena DT	Class Certification
2/16/2022	Mark Johnson	0.9	\$1,150	\$1,035	prep for meet and confer w/ OC re Jestrabek-Hart rogs	Discovery (Non-Deposition)
2/16/2022	Mark Johnson	0.6	\$1,150	\$690	meet and confer call w OC Jacobsen and Riley ant TCC re Jestrabek-Hart rogs	Discovery (Non-Deposition)
2/16/2022	Mark Johnson	2.7	\$1,150	\$3,105	research depo testimony and statements in Daubert motions for Flores and Schroyer re norms and Benchmark calculations for motion to compare Benchmark calculations, and work on same	Other Motions
2/16/2022	Rachel Steyer	0.2	\$750	\$150	editing and finalizing draft DMS declaration	Class Certification
2/16/2022	Rachel Steyer	0.5	\$750	\$375	editing and revising draft RVR declaration	Class Certification
2/16/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising SLS draft declaration	Class Certification
2/16/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising KGJ draft declaration	Class Certification
2/16/2022	Rachel Steyer	0.4	\$750	\$300	received call back from current resident, discussed case, interested in participating further	Class Outreach and Contact
2/16/2022	Rachel Steyer	0.2	\$750	\$150	email to declarant to set up and schedule follow up call	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/16/2022	Rachel Steyer	0.3	\$750	\$225	received call back from current resident, interested in participating, will forward contact to DMS	Class Outreach and Contact
2/16/2022	Rachel Steyer	0.7	\$750	\$525	communications on teams with DMS, SLS, RVR, GSL, KGJ concerning outreahc protocols and drafting declarations	Class Outreach and Contact
2/16/2022	Rachel Steyer	2.8	\$750	\$2,100	reviewing defendants' latest productions of declarant documents, updating chart and spreadsheet tracking production	Discovery (Non-Deposition)
2/16/2022	Travis Close	0.4	\$850	\$340	Finalize notes in M/C with Defs re: responses to ROGS; send to team	Case Organization, Planning and Strategy
2/16/2022	Travis Close	0.7	\$850	\$595	Meet and confer with MTJ, defendants re: responses to plaintiff bernie jestrabek-hart's interrogatories	Communications With Opposing Counsel
2/16/2022	Travis Close	1.5	\$850	\$1,275	Legal research re: whether challenges to persuasiveness of conclusion is a base of excluding testimony	Experts (Including Retention)
2/16/2022	Travis Close	1.7	\$850	\$1,445	Review and analyze depo testimony by Brookdale's witnesses re local policies and procedures for tranportation and emergency evacuation	Experts (Including Retention)
2/16/2022	Travis Close	0.5	\$850	\$425	Analyze versions of fleet safety policy for any significant/relevant changes	Experts (Including Retention)
2/16/2022	Travis Close	1.4	\$850	\$1,190	Continue drafting Opposition to daubert motion for Douglas Cross (argument: A(1): Brookdale's Claims About Local Policies Do Not Impact Mr. Cross's Methodology)	Pleadings and Motions Re: Pleadings
2/16/2022	Travis Close	1.3	\$850	\$1,105	Continue drafting Opposition to daubert motion for Douglas Cross (argument: A(2) Defendants Fail to Challenge the Fleet Safety Policy Analysis)	Pleadings and Motions Re: Pleadings
2/17/2022	Guy Wallace	0.6	\$1,350	\$810	com's with Marks; JT; MTJ re comparison of Brookdale's benchmarks to actual staffing; what job positions provide direct care	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/17/2022	Mark Johnson	0.6	\$1,150	\$690	GTM call with Wallace, Thornton, Marks to discuss analysis of punch data and benchmarks and jobs included / excluded from analysis for reply brief and expert declarations	Class Certification
2/17/2022	Mark Johnson	4.7	\$1,150	\$5,405	continue working on joint letter p section re production of benchmark formula, review of pleadings and depo testimony for same	Other Motions
2/17/2022	Rachel Steyer	0.7	\$750	\$525	call with KGJ to discuss and review declaration questions	Class Outreach and Contact
2/17/2022	Rachel Steyer	0.3	\$750	\$225	communications on teams with DMS, KGJ, GSL concerning outreach and declaration drafting	Class Outreach and Contact
2/17/2022	Rachel Steyer	5.8	\$750	\$4,350	completing review of defendants' production of declarants' records, updating spreadsheet	Discovery (Non-Deposition)
2/17/2022	Travis Close	0.3	\$850	\$255	Review and analyze letter from donald miller re: experiences with Brookdale	Case Organization, Planning and Strategy
2/17/2022	Travis Close	0.2	\$850	\$170	Email to LEC re: subpoena templates for review	Case Organization, Planning and Strategy
2/17/2022	Travis Close	0.2	\$850	\$170	Meet with LEC re: requesting depo transcripts and exhibits	Depositions
2/17/2022	Travis Close	0.7	\$850	\$595	Continue drafting Opposition to Daubert motion for Douglas Cross ((A)(3) Brookdale Fails to Show that Industry Standards Affect Mr. Cross's Analysis)	Depositions
2/17/2022	Travis Close	1.3	\$850	\$1,105	Compile, organize, and prepare template subpoena forms for new requests to DSS	Discovery (Non-Deposition)
2/17/2022	Travis Close	0.3	\$850	\$255	Review and analyze Def's motion + exhibits in Opposition to Ps' request for extension to file daubert oppositions	Discovery (Non-Deposition)
2/17/2022	Travis Close	1.4	\$850	\$1,190	Legal research re: cases where legal conclusions were admissible by expert (Cross daubert opposition)	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/17/2022	Travis Close	1.7	\$850	\$1,445	Continue drafting Opposition to Daubert motion for Douglas Cross (B. MR. CROSS'S TESTIMONY IS HELPFUL TO THE COURT AND DOES NOT WARRANT EXCLUSION)	Experts (Including Retention)
2/17/2022	Travis Close	1.2	\$850	\$1,020	Continue drafting Opposition to Daubert motion for Douglas Cross ((A)(2) Defendants Fail to Challenge the Fleet Safety Policy Analysis	Pleadings and Motions Re: Pleadings
2/18/2022	Guy Wallace	0.7	\$1,350	\$945	prepare for and participate in zoom with GG; AX; KS; EH; BU; MTJ; TCC; RLS re Defendants' Daubert motions; further motions to compel; expert discovery	Class Certification
2/18/2022	Guy Wallace	0.3	\$1,350	\$405	review and analysis of draft MTC re benchmark formula; com's with Marks; JT; MTJ re same	Other Motions
2/18/2022	Guy Wallace	0.3	\$1,350	\$405	review and analysis of revisions to draft MTC re motion to compel benchmark formula; com's with MTJ re same	Other Motions
2/18/2022	Mark Johnson	3.3	\$1,150	\$3,795	draft and revise attachment for DSS subpoena to CAB with instructions, definitions and description of documents; prepare table of facilities subject to request for attachment	Discovery (Non-Deposition)
2/18/2022	Mark Johnson	0.2	\$1,150	\$230	draft email to COC re strategy for DSS subpoena and scope of docs to request.	Discovery (Non-Deposition)
2/18/2022	Mark Johnson	1.5	\$1,150	\$1,725	revise draft P section of joint ltr re benchmark formula, coms w/ GBW, Marks re same; review docket for citations; email to OC transmitting same	Other Motions
2/18/2022	Rachel Steyer	0.6	\$750	\$450	biweekly call with cocounsel to discuss strategy and tasks/assignments	Case Organization, Planning and Strategy
2/18/2022	Rachel Steyer	0.3	\$750	\$225	call with KGJ to discuss intake and potential declarant	Class Certification
2/18/2022	Rachel Steyer	0.4	\$750	\$300	received call from current resident, discussed case	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/18/2022	Rachel Steyer	0.4	\$750	\$300	received call from family member of resident, discussed case, wanted to discuss with family and plans to follow up	Class Outreach and Contact
2/18/2022	Rachel Steyer	0.2	\$750	\$150	communications on teams with KGJ, DMS, TRB, RVR, SLS concerning outreach and declaration drafting efforts	Class Outreach and Contact
2/18/2022	Rachel Steyer	2.3	\$750	\$1,725	reviewing 30b6 topic 10 to identify instances when deponent did not know answer to questions within scope of testimony	Depositions
2/18/2022	Rachel Steyer	2.2	\$750	\$1,650	reviewing 30b6 depo topic 12 to identify instances when deponent did not know answers to questions within scope of topic	Depositions
2/18/2022	Rachel Steyer	0.2	\$750	\$150	email to GBW and MTJ summarizing updated spreadsheet tracking defendants' production of declarant documents	Discovery (Non-Deposition)
2/18/2022	Travis Close	0.6	\$850	\$510	Team meeting w/ RLS, GBW, MTJ and co-counsel re: Daubert motions, motions to compel, litigation timeline, etc	Case Organization, Planning and Strategy
2/18/2022	Travis Close	0.4	\$850	\$340	Review and analyze memo by AXU re: operation of Brookdale facilities	Case Organization, Planning and Strategy
2/18/2022	Travis Close	0.3	\$850	\$255	Review, analyze, and revise draft version of joint letter brief re: benchmark algorithm	Discovery (Non-Deposition)
2/18/2022	Travis Close	1.3	\$850	\$1,105	Review and analyze docs from Andrew Lindner (paralegal/legal dept) re: operator of facilities	Discovery (Non-Deposition)
2/18/2022	Travis Close	1.4	\$850	\$1,190	Review and analyze docs, emails from Kevin Bowman re: operation of facilities by Brookdale corporate	Discovery (Non-Deposition)
2/18/2022	Travis Close	1.5	\$850	\$1,275	Analyze agreements recently produced for info re: bank accounts, pooled money	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/18/2022	Travis Close	1.6	\$850	\$1,360	Legal research re: piercing the corporate veil as applicable to 100% owned subsidiary/holding company connection	Pleadings and Motions Re: Pleadings
2/22/2022	Guy Wallace	1.3	\$1,350	\$1,755	legal research and analysis re Ninth Circuit case law re burden at class certification and evaluation and weighing of factual disputes re commonality and expert testimony	Class Certification
2/22/2022	Mark Johnson	0.3	\$1,150	\$345	com w/ S Stiner re review of transcript volume 2 and corrections	Depositions
2/22/2022	Mark Johnson	0.2	\$1,150	\$230	review ltr from OC Rutner re motion to compel benchmark formula; com w/ COC re same	Other Motions
2/22/2022	Mark Johnson	6.5	\$1,150	\$7,475	work on MTC ltr re responses to Jestrabek-Hart rogs 1-6, including legal research re same	Other Motions
2/22/2022	Rachel Steyer	0.3	\$750	\$225	call with KGJ to discuss and review questions concerning potential declarants	Class Certification
2/22/2022	Rachel Steyer	0.7	\$750	\$525	received call back from class member, continued intake	Class Outreach and Contact
2/22/2022	Rachel Steyer	0.6	\$750	\$450	received call from family member of former residnet, discussed case, wwanted to wait until she conferred with family, will call back	Class Outreach and Contact
2/22/2022	Rachel Steyer	2.5	\$750	\$1,875	completing intake call with daughter of current resident, updated sharepoint notes, created client folder	Class Outreach and Contact
2/22/2022	Rachel Steyer	0.6	\$750	\$450	follow up call with family member of former resident, discussed current situation, rescheduled intake call	Class Outreach and Contact
2/22/2022	Rachel Steyer	0.6	\$750	\$450	follow up call with family member who called in, discussed case, said she will discuss with brother and follow up next week	Class Outreach and Contact
2/22/2022	Rachel Steyer	0.2	\$750	\$150	communications on teams with KGJ, SLS, GSL concerning outreach efforts	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/22/2022	Travis Close	1.3	\$850	\$1,105	Legal research re: whether fully owned subsidiaries can be held as alter egos	Case Organization, Planning and Strategy
2/22/2022	Travis Close	1.5	\$850	\$1,275	Analyze production of CDSS docs received for evidence of correspondence from central San Francisco facility	Case Organization, Planning and Strategy
2/22/2022	Travis Close	1.4	\$850	\$1,190	Analyze resident files of witness declarants for evidence of complaint to Brookdale management -- Jan Cuomo, Milton Clements, Pearl Filice, Doris Poulos, Roberta Danek, Mary Wiece	Case Organization, Planning and Strategy
2/22/2022	Travis Close	1.0	\$850	\$850	Review and analyze samples of residency agreements from database for info re: choice of law provisions	Case Organization, Planning and Strategy
2/22/2022	Travis Close	1.5	\$850	\$1,275	Review and analyze depo transcripts from ED witnesses for testimony re: centralized operation of facilities	Depositions
2/22/2022	Travis Close	0.2	\$850	\$170	Review and analyze Ds' response to discovery letter brief on staffing formulas	Discovery (Non-Deposition)
2/22/2022	Travis Close	0.5	\$850	\$425	Analyze resident files of witness declarants for evidence of complaint to Brookdale management --Mae Fredette, Francine Brezicki, Lois Lewright	Discovery (Non-Deposition)
2/23/2022	Guy Wallace	2.1	\$1,350	\$2,835	revise and edit draft class cert reply declarations; com's with MTJ; RLS re same	Class Certification
2/23/2022	Guy Wallace	1.6	\$1,350	\$2,160	revise and edit draft letter re interrogatories re local transportation policies; access improvements; centralization of finances; legal research and analysis re same and com's with MTJ re same	Other Motions
2/23/2022	Guy Wallace	0.8	\$1,350	\$1,080	legal research and analysis re Daubert motions and recent Ninth Circuit decisions re same; com's with BU; MTJ; TCC re same	Other Motions
2/23/2022	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re brookdale motions to compel, issues related to corporate alter ego.	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/23/2022	Rachel Steyer	0.2	\$750	\$150	call with DMS to discuss follow up with likely declarant	Class Certification
2/23/2022	Rachel Steyer	0.6	\$750	\$450	reviewing and editing KGJ draft declaration	Class Certification
2/23/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising SLS draft declaration	Class Certification
2/23/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising SLS draft declaration	Class Certification
2/23/2022	Rachel Steyer	1.0	\$750	\$750	follow up call with likely declarant to review outstanding questions and clarifications in draft declaration	Class Certification
2/23/2022	Rachel Steyer	0.5	\$750	\$375	editing and revising SLS draft declaration	Class Certification
2/23/2022	Rachel Steyer	0.5	\$750	\$375	editing and revising DMS draft declaration	Class Certification
2/23/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising GSL draft declaration	Class Certification
2/23/2022	Rachel Steyer	0.2	\$750	\$150	reviewing and incorporating GBW edits into draft declaration	Class Certification
2/23/2022	Rachel Steyer	0.7	\$750	\$525	received call from family member of resident, discussed case, scheduled intake	Class Outreach and Contact
2/23/2022	Rachel Steyer	0.2	\$750	\$150	received check in call from family member of current resident, discussed arbitration status	Class Outreach and Contact
2/23/2022	Rachel Steyer	0.3	\$750	\$225	communications on teams with KGJ, SLS, GSL, DMS, TRB regarding outreach and declaratino drafting	Class Outreach and Contact
2/23/2022	Rachel Steyer	0.2	\$750	\$150	reviewing DMS partially completed intake	Class Outreach and Contact
2/23/2022	Rachel Steyer	0.3	\$750	\$225	reviewing production for documents corresponding to potential declarant	Discovery (Non-Deposition)
2/23/2022	Travis Close	0.2	\$850	\$170	Email to MTJ, GBW re: good authority for Daubert opposition found in ninth circuit decision	Case Organization, Planning and Strategy
2/23/2022	Travis Close	1.2	\$850	\$1,020	Legal research re: under which conditions can experts refer to law and regs in their analysis	Case Organization, Planning and Strategy
2/23/2022	Travis Close	0.3	\$850	\$255	Meet w/ LEC re: preparing exhibits for joint letter briefs	Communications With Opposing Counsel

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/23/2022	Travis Close	0.4	\$850	\$340	Review, analyze, and revise joint letter brief re: Bernier JB's first set of ROGs	Discovery (Non-Deposition)
2/23/2022	Travis Close	0.2	\$850	\$170	Meet w/ LEC re: responses to ROGs for Bernie JB	Discovery (Non-Deposition)
2/23/2022	Travis Close	1.3	\$850	\$1,105	Continue drafting Daubert Opposition for Douglas Cross (Part B - legal conclusions and helpful testimony)	Experts (Including Retention)
2/23/2022	Travis Close	0.5	\$850	\$425	Continue drafting Daubert Opposition for Douglas Cross (Brookdale Fails to Show that Industry Standards Affect Mr. Cross's Analysis)	Experts (Including Retention)
2/23/2022	Travis Close	1.7	\$850	\$1,445	Review and analyze ninth circuit decision in Elosu v. Middlefork Ranch; take notes and revise standard of review, base analysis for Kailes and Cross daubert oppositions	Pleadings and Motions Re: Pleadings
2/23/2022	Travis Close	1.5	\$850	\$1,275	Legal research re: exclusion of expert testimony based on documents provided by plaintiffs and/or using assumptions provided by plaintiffs	Pleadings and Motions Re: Pleadings
2/24/2022	Guy Wallace	0.3	\$1,350	\$405	com's with GG re preparation for class certification reply papers; expert Saul Solomon	Class Certification
2/24/2022	Guy Wallace	0.6	\$1,350	\$810	legal research and analysis re evaluation of commonality and factual disputes re same	Class Certification
2/24/2022	Guy Wallace	0.2	\$1,350	\$270	com's with Marks re further staffing analysis of Brookdale facilities	Experts (Including Retention)
2/24/2022	Guy Wallace	1.3	\$1,350	\$1,755	legal research and analysis re Daubert standards and Defendants' arguments based on facts relied upon by Plaintiffs' experts; com's with MTJ re same	Other Motions
2/24/2022	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW re COC communication w/ OC Charlie Lee, coordination of communication and negotiations with OC, ownership / control issues and expert re same;	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/24/2022	Mark Johnson	0.2	\$1,150	\$230	call and text w/ client S Stiner re Errata and logistics for getting signatures on same	Depositions
2/24/2022	Mark Johnson	0.3	\$1,150	\$345	coms w LEC re preparation of Errata for v. 2 of deposition of S Stiner and getting signature on same	Depositions
2/24/2022	Mark Johnson	0.3	\$1,150	\$345	call w/ J Yelin re strategy and approach for P section of joint ltr brief on Operating plans	Other Motions
2/24/2022	Mark Johnson	2.1	\$1,150	\$2,415	draft ltr to OC responding to proposed delay in submitting section of joint letter, merits of dispute re production of labor benchmark formula, meeting and conferring.	Other Motions
2/24/2022	Travis Close	1.7	\$850	\$1,445	Resaerch SOS filings of Brookdale subsidiaries and analyze whether officres/directors listed are Brookdale officers	Case Organization, Planning and Strategy
2/24/2022	Travis Close	1.2	\$850	\$1,020	legal research re: what counts as disregard of corporate formalities in alter ego analysis	Case Organization, Planning and Strategy
2/24/2022	Travis Close	0.5	\$850	\$425	Prepare depo errata template for LEC	Depositions
2/24/2022	Travis Close	0.2	\$850	\$170	Email to LEC re: depo errata template for Plaintiff Stiner	Depositions
2/24/2022	Travis Close	0.3	\$850	\$255	Review and analyze draft response to Eric Rutner re: joint letter brief on benchmark algorithms	Discovery (Non-Deposition)
2/24/2022	Travis Close	1.1	\$850	\$935	Legal research re: whether contradictory evidence goes to weight or admissibility, in context of daubert oppositions	Experts (Including Retention)
2/24/2022	Travis Close	1.2	\$850	\$1,020	Continue drafting doug Cross daubert opposition (section A(3))	Pleadings and Motions Re: Pleadings
2/24/2022	Travis Close	1.3	\$850	\$1,105	Continue drafting doug Cross daubert opposition (section A(2))	Pleadings and Motions Re: Pleadings
2/25/2022	Guy Wallace	1.2	\$1,350	\$1,620	revise and edit draft reply declarations of putative class members	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/25/2022	Guy Wallace	0.6	\$1,350	\$810	legal research and analysis re whether CLRA liability is limited to owners of facilities or signators to a contract	Misc. Research
2/25/2022	Guy Wallace	1.1	\$1,350	\$1,485	revise and edit draft MTCs re plans of operations and documents re alterations; com's with JY; MTJ re same	Other Motions
2/25/2022	Travis Close	1.9	\$850	\$1,615	legal research - how to show lack of segregation of corporate records	Case Organization, Planning and Strategy
2/25/2022	Travis Close	1.4	\$850	\$1,190	Review and analyze e-discovery produced for evidence of paystubs (alter ego analysis)	Discovery (Non-Deposition)
2/25/2022	Travis Close	0.3	\$850	\$255	Review and analyze draft joint discovery brief re RFPs 18-18	Discovery (Non-Deposition)
2/25/2022	Travis Close	0.6	\$850	\$510	Edits to introduction for Doug Cross Daubert Opposition draft	Discovery (Non-Deposition)
2/25/2022	Travis Close	1.5	\$850	\$1,275	Final edits to Doug Cross daubert opposition - first draft - before sending to MTJ, GBW	Experts (Including Retention)
2/25/2022	Travis Close	0.1	\$850	\$85	Email to MTJ, GBW re: draft of Doug Cross Daubert opposition for review	Experts (Including Retention)
2/25/2022	Travis Close	1.1	\$850	\$935	Revisions and additions to shared document/memo re: evidence of alter ego liability	Pleadings and Motions Re: Pleadings
2/26/2022	Guy Wallace	3.6	\$1,350	\$4,860	revise and edit reply declarations from putative class members	Class Certification
2/26/2022	Guy Wallace	1.6	\$1,350	\$2,160	legal research and analysis re case law re liability under the CLRA and UCL for entities or individuals that participate in and control representations made by other entities	Misc. Research
2/27/2022	Guy Wallace	1.8	\$1,350	\$2,430	revise and edit draft reply declarations of putative class members	Class Certification
2/27/2022	Guy Wallace	1.0	\$1,350	\$1,350	analysis of class certification motion and Defendants' tactics re settlement	Settlement

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/28/2022	Guy Wallace	0.9	\$1,350	\$1,215	legal research and analysis re whether liability under the CLRA is limited to owners or parties in contractual privity with the buyer	Class Certification
2/28/2022	Guy Wallace	0.4	\$1,350	\$540	legal research and analysis re ADA Title III TAM and coverage of assisted living facilities; com's with MTJ re same	Class Certification
2/28/2022	Guy Wallace	0.8	\$1,350	\$1,080	preparation of responsive points re Defendants' arguments re class certification	Class Certification
2/28/2022	Guy Wallace	1.3	\$1,350	\$1,755	legal research and analysis re Defendants' Daubert arguments re "cherry picked" data; factual analysis; analysis allegedly prepared for solely for purposes of litigation; general acceptance; contention that Dr. Flores failed to make any opinion about whether there is a "substantial certainty" that Brookdale's staffing services will fail	Other Motions
2/28/2022	Guy Wallace	1.7	\$1,350	\$2,295	review and analysis of Defendants' Daubert motion re Kailes	Other Motions
2/28/2022	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re litigation strategy, Ds' position on ADA coverage and DOJ TAM supporting coverage	Case Organization, Planning and Strategy
2/28/2022	Mark Johnson	0.8	\$1,150	\$920	call w/ GBW re ownership issue and impact of expert analysis on class cert, ability to show liability on all claims w/o showing common ownership of all facilities, strategy re same	Case Organization, Planning and Strategy
2/28/2022	Mark Johnson	0.1	\$1,150	\$115	email to OC re missing depo exhibits	Depositions
2/28/2022	Mark Johnson	0.1	\$1,150	\$115	coms w/ client S Stiner re depo review	Depositions
2/28/2022	Mark Johnson	0.8	\$1,150	\$920	review charts from RLS identifying depo passages of testimony where witnesses failed to authenticate documents and professed lack of knowledge	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/28/2022	Mark Johnson	0.7	\$1,150	\$805	review email and attachment from D Marks of reportable events report; search relativity for similar docs; email to COC re same and request follow up from JP	Discovery (Non-Deposition)
2/28/2022	Mark Johnson	0.5	\$1,150	\$575	email exchanges w/ LEC re depo exhibits, depo transcripts, service of DSS subpoena, deliver of depo transcript v 1 to client Stiner	Discovery (Non-Deposition)
2/28/2022	Mark Johnson	0.2	\$1,150	\$230	call w GBW re D's Daubert motions	Other Motions
2/28/2022	Mark Johnson	5.7	\$1,150	\$6,555	work on opposition to mtn to exclude Waters and Mastin declarations, including review of motion, review of case law, review of stip and prior pleadings, drafting	Other Motions
2/28/2022	Rachel Steyer	0.2	\$750	\$150	email to GBW and MTJ compiling remaining declarations for review	Class Certification
2/28/2022	Rachel Steyer	0.4	\$750	\$300	editing and reviewing DMS draft declaration	Class Certification
2/28/2022	Rachel Steyer	0.3	\$750	\$225	call with DMS to discuss draft declaration and status of intakes	Class Certification
2/28/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising GSL draft declaration	Class Certification
2/28/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising RDR draft declaration	Class Certification
2/28/2022	Rachel Steyer	0.2	\$750	\$150	reviewing and incorporating GBW and MTJ edits into draft declaration	Class Certification
2/28/2022	Rachel Steyer	1.6	\$750	\$1,200	drafting class member declaration	Class Certification
2/28/2022	Rachel Steyer	1.3	\$750	\$975	reviewing production and documents corresponding to likely declarants	Discovery (Non-Deposition)
2/28/2022	Travis Close	0.2	\$850	\$170	Review and analyze draft joint letter brief by co-counsel re: plans of operation	Case Organization, Planning and Strategy
2/28/2022	Travis Close	1.3	\$850	\$1,105	Legal research re: how to show inequitable outcome under Alter ego analysis	Case Organization, Planning and Strategy
2/28/2022	Travis Close	0.3	\$850	\$255	Analyze progress on agreements assignment by EPO	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/28/2022	Travis Close	1.5	\$850	\$1,275	Legal reasearch collecting cases in California state courts which showed inequitable outcome in alter ego analysis	Case Organization, Planning and Strategy
2/28/2022	Travis Close	0.8	\$850	\$680	Review and analyze results for "regulatory reportable events" -- question from staffing experts	Discovery (Non-Deposition)
2/28/2022	Travis Close	1.7	\$850	\$1,445	Continue drafting/editing Kailes Daubert opposition brief -- ((1) Brookdale Has Failed to Challenge the Processes Followed by June Kailes In This Case)	Pleadings and Motions Re: Pleadings
2/28/2022	Travis Close	1.4	\$850	\$1,190	Continue drafting/editing Kailes Daubert opposition brief -- (2) Documents Reviewed by Ms. Kailes Were Sufficient for Her Analysis	Pleadings and Motions Re: Pleadings
3/1/2022	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of Defendants' Daubert motion re Kailes; com's with MTJ re same	Other Motions
3/1/2022	Guy Wallace	3.6	\$1,350	\$4,860	review and analysis of Defendants' Daubert motion re Cross; preparation of arguments and points re same; com's with MTJ re same (.7)	Other Motions
3/1/2022	Guy Wallace	2.2	\$1,350	\$2,970	legal research and analysis re arguments made in Defendants' Daubert motions re Kailes; Cross and Flores	Other Motions
3/1/2022	Mark Johnson	1.2	\$1,150	\$1,380	calls (x4) w/ GBW re motions to exclude expert witnesses	Other Motions
3/1/2022	Mark Johnson	7.5	\$1,150	\$8,625	work on opposition to motion to exclude Mastin / Waters decllaration	Other Motions
3/1/2022	Rachel Steyer	0.5	\$750	\$375	editing and revising DMS draft declaration	Class Certification
3/1/2022	Rachel Steyer	0.7	\$750	\$525	editing and revising draft declaration based on new information from declarant	Class Certification
3/1/2022	Rachel Steyer	1.1	\$750	\$825	Conducted read through call with declarant, reviewed declaration and discussed sending documents	Class Certification
3/1/2022	Rachel Steyer	0.2	\$750	\$150	call with class member declarant, scheduled follow up read through call	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/1/2022	Rachel Steyer	0.2	\$750	\$150	follow up call with declarant, scheduled read through call	Class Certification
3/1/2022	Rachel Steyer	0.2	\$750	\$150	email to RDR, GSL, KGJ, SLS, DMS, RVR, TRB concerning outreach protocols	Class Outreach and Contact
3/1/2022	Rachel Steyer	0.3	\$750	\$225	call with KGJ to discuss intakes and potential declarants	Class Outreach and Contact
3/1/2022	Rachel Steyer	0.2	\$750	\$150	received follow up call from family member of current resident, discussed case, said he's going to check arbitration status and follow up	Class Outreach and Contact
3/1/2022	Rachel Steyer	0.4	\$750	\$300	reviewing production for documents corresponding to likely declarant	Discovery (Non-Deposition)
3/1/2022	Travis Close	1.4	\$850	\$1,190	Continue drafting memo re: facts for alter ego/ownership issues	Case Organization, Planning and Strategy
3/1/2022	Travis Close	1.5	\$850	\$1,275	Legal research re: state court cases showing "lack of segregation of corporate records" as demonstrating alter ego	Case Organization, Planning and Strategy
3/1/2022	Travis Close	0.8	\$850	\$680	Review and analyze recent DSS facility evaluation reports and complaint investigation reports for Riverwalk, Chatsworth, Uptown Whittier, Napa, Irvine, Clairemont, Oceanside, and Chanate facilities	Case Organization, Planning and Strategy
3/1/2022	Travis Close	1.7	\$850	\$1,445	Continue revising Kailes Dauber opposition motion ((5) Ms. Kailes' Opinions are Clearly Explained in Her Declaration)	Discovery (Non-Deposition)
3/1/2022	Travis Close	0.7	\$850	\$595	Analyze trial testimony of June Kailes in Center for Independent Living v. New York case for legal opinions	Discovery (Non-Deposition)
3/1/2022	Travis Close	1.0	\$850	\$850	Continue revising Kailes Dauber opposition motion, section: ((3) Ms. Kailes' Conclusions Are Supported by Substantial Evidence)	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/2/2022	Guy Wallace	1.9	\$1,350	\$2,565	preparation of short memo re case law applicable to Defendants' Daubert motions	Misc. Research
3/2/2022	Guy Wallace	0.9	\$1,350	\$1,215	revise and edit short memo re case law re Defendants' Daubert motions	Other Motions
3/2/2022	Guy Wallace	2.7	\$1,350	\$3,645	review and analysis of draft of opposition to Daubert motion re Cross; review and analysis of Fleet Safety Policy; preparation of revised introduction to brief; com's with MTJ; TCC; RLS re same (.8)	Other Motions
3/2/2022	Guy Wallace	1.5	\$1,350	\$2,025	review and analysis of draft of opposition to Daubert motion re Kailes; preparation of revised structure re same; com's with TCC re same	Other Motions
3/2/2022	Guy Wallace	1.5	\$1,350	\$2,025	review and analysis of draft of opposition to Daubert motion re Flores; com's with BU re same	Other Motions
3/2/2022	Guy Wallace	0.2	\$1,350	\$270	com's with MTJ re opposition to Daubert motion re Waters and Mastin	Other Motions
3/2/2022	Mark Johnson	8.0	\$1,150	\$9,200	work on revising and adding to draft opposition to mtn to exclude waters and mastin declarations; review testimony and other docs for same	Other Motions
3/2/2022	Rachel Steyer	0.6	\$750	\$450	conducted read through call with declarant	Class Certification
3/2/2022	Rachel Steyer	1.0	\$750	\$750	editing and revising GSL draft declaration	Class Certification
3/2/2022	Rachel Steyer	0.7	\$750	\$525	editing and revising RVR draft declaration	Class Certification
3/2/2022	Rachel Steyer	0.6	\$750	\$450	completing drafting and revising of DMS draft declaration	Class Certification
3/2/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising DMS draft declaration	Class Certification
3/2/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising draft KGJ declaration	Class Certification
3/2/2022	Rachel Steyer	1.4	\$750	\$1,050	completing intake call with family member of former resident, updating notes in sharepoint	Class Outreach and Contact
3/2/2022	Rachel Steyer	0.2	\$750	\$150	communications on teams with DMS, RVR, RDR, KGJ concerning outreach efforts	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/2/2022	Rachel Steyer	0.2	\$750	\$150	reviewing and organizing documents and records provided by likely declarant	Class Outreach and Contact
3/2/2022	Rachel Steyer	0.2	\$750	\$150	call with GBW to discuss fleet safety policies	Discovery (Non-Deposition)
3/2/2022	Rachel Steyer	0.4	\$750	\$300	preparing email to GBW outlining documents and policies corresponding to transportation and scooter transferring	Discovery (Non-Deposition)
3/2/2022	Rachel Steyer	0.4	\$750	\$300	reviewing transportation documents and policies to identify scooter transfer policy	Discovery (Non-Deposition)
3/2/2022	Rachel Steyer	0.4	\$750	\$300	reviewing production for documents corresponding to potential declarant	Discovery (Non-Deposition)
3/2/2022	Travis Close	1.3	\$850	\$1,105	Review and analyze draft of Flores daubert opposition by BMU; work pertinent case law into Kailes daubert opposition	Case Organization, Planning and Strategy
3/2/2022	Travis Close	0.2	\$850	\$170	Call with GBW re: Brookdale's policy and procedure manual	Case Organization, Planning and Strategy
3/2/2022	Travis Close	0.6	\$850	\$510	Analyze emails collected by JMP re: Michael Johnson to find resident complaints involving accessible transportation	Case Organization, Planning and Strategy
3/2/2022	Travis Close	0.9	\$850	\$765	Analysis of mandatory language in fleet safety policy & in doug cross depo testimony	Discovery (Non-Deposition)
3/2/2022	Travis Close	0.2	\$850	\$170	Email to GBW re: language showing fleet safety policy is mandatory	Discovery (Non-Deposition)
3/2/2022	Travis Close	0.2	\$850	\$170	Email to MTJ, GBW re: resident complaints about accessible transportation issues at brookdale	Discovery (Non-Deposition)
3/2/2022	Travis Close	0.7	\$850	\$595	distinguish cases cited in opposition brief re sampling in expert analysis (In re Countrywide Fin. Corp. Mortgage-Backed Secs.)	Discovery (Non-Deposition)
3/2/2022	Travis Close	0.3	\$850	\$255	Call with GBW re: edits to Kailes declaration	Experts (Including Retention)
3/2/2022	Travis Close	0.7	\$850	\$595	Review and analyze depositions of Cross for testimony re: practices reviewed at Brookdale facilities	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/2/2022	Travis Close	0.8	\$850	\$680	Review and analyze case law compiled by GBW on criteria for proper Daubert analysis	Experts (Including Retention)
3/2/2022	Travis Close	1.2	\$850	\$1,020	Continue drafting/revising memo analyzing factors for alter ego for Brookdale Senior Living & subsidiaries	Pleadings and Motions Re: Pleadings
3/3/2022	Guy Wallace	1.3	\$1,350	\$1,755	review and analysis of Defendants' opposition to motion for class certification	Class Certification
3/3/2022	Guy Wallace	1.6	\$1,350	\$2,160	review and analysis of Defendants' Daubert motion re Cross, preparation of outline of responsive points re same	Other Motions
3/3/2022	Guy Wallace	1.3	\$1,350	\$1,755	preparation of revised outline of opposition to Daubert motion re Cross; com's with TCC re same	Other Motions
3/3/2022	Guy Wallace	0.8	\$1,350	\$1,080	legal research and analysis re case law re Daubert challenges to expert sample sizes	Other Motions
3/3/2022	Guy Wallace	2.3	\$1,350	\$3,105	review and analysis of Defendants' motion to exclude Waters and Mastin testimony; preparation of notes re responsive points; com's with MTJ re same (.4)	Other Motions
3/3/2022	Rachel Steyer	0.2	\$750	\$150	call with RDR to discuss read through ready draft declarations	Class Certification
3/3/2022	Rachel Steyer	0.7	\$750	\$525	conducted read through call with declarant	Class Certification
3/3/2022	Rachel Steyer	0.5	\$750	\$375	making final edits and revisions to draft declaration following read through call	Class Certification
3/3/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising SLS draft declaration	Class Certification
3/3/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising SLS draft declaration	Class Certification
3/3/2022	Rachel Steyer	0.5	\$750	\$375	drafting class member declaration	Class Certification
3/3/2022	Rachel Steyer	0.5	\$750	\$375	call with current resident, discussed case and his options, will follow up upon receipt of faxed documents in coming days	Class Outreach and Contact
3/3/2022	Rachel Steyer	0.2	\$750	\$150	communications on teams with SLS, DMS, RDR, GSL concerning outreach and declaration drafting qusetions	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/3/2022	Rachel Steyer	0.4	\$750	\$300	reviewing production for documents corresponding to likely declarant	Discovery (Non-Deposition)
3/3/2022	Travis Close	0.4	\$850	\$340	Review notes from co-counsel from call with potential witness who is suing Brookdale in separate action & complaint	Case Organization, Planning and Strategy
3/3/2022	Travis Close	1.9	\$850	\$1,615	Continue revising Kailes Opposition to Daubert Motion (A. Brookdale's Emergency Evacuation Policies and Procedures; B. Foundation and Opinions of June Kailes)	Case Organization, Planning and Strategy
3/3/2022	Travis Close	1.3	\$850	\$1,105	Continue analyzing and distinguishing cases cited in Def's Motion to Exclude Kailes testimony (pages 4-9)	Experts (Including Retention)
3/3/2022	Travis Close	2.4	\$850	\$2,040	Continue analyzing and distinguishing cases cited in Def's Motion to Exclude Kailes testimony (pages 10-11)	Experts (Including Retention)
3/3/2022	Travis Close	1.3	\$850	\$1,105	Reorganize Kailes draft opposition to daubert motion per outline by GBW	Experts (Including Retention)
3/3/2022	Travis Close	0.7	\$850	\$595	Analyze 2020 Emergency Manual for info re: mandatory, applicable to all facilities	Experts (Including Retention)
3/4/2022	Guy Wallace	2.8	\$1,350	\$3,780	review and analysis of Defendants' opposition to class certification	Class Certification
3/4/2022	Guy Wallace	0.8	\$1,350	\$1,080	com's with MTJ re Defendants' opposition to class certification	Class Certification
3/4/2022	Guy Wallace	1.4	\$1,350	\$1,890	prepare for and participate in zoom with GG; JY; BBK; AX; KS; EH; BU; MTJ; TCC; RLS re Defendants' opposition to class certification	Class Certification
3/4/2022	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re TransUnion; Defendants' other citations re no injury; evidence of corporate control over facility-level operations	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/4/2022	Guy Wallace	0.4	\$1,350	\$540	com's with RLS re preparation of further declarations from putative class members; discovery plan re Defendants' happy camper declarations	Class Certification
3/4/2022	Guy Wallace	1.2	\$1,350	\$1,620	preparation of notes, questions and tasks re D's opposition to class certification	Class Certification
3/4/2022	Guy Wallace	1.1	\$1,350	\$1,485	legal research and analysis re liability under the CLRA and UCL in the absence of contractual privity, participation in false or misleading statements	Misc. Research
3/4/2022	Rachel Steyer	1.4	\$750	\$1,050	meeting with GBW, TCC, MTJ and co-counsel to review and discuss defendants' opposition motion and task list for reply	Case Organization, Planning and Strategy
3/4/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising DMS draft declaration	Class Certification
3/4/2022	Rachel Steyer	0.4	\$750	\$300	conducted read through call with declarant to review declaration	Class Certification
3/4/2022	Rachel Steyer	0.3	\$750	\$225	call with GBW to discuss strategy behind identifying deponents	Class Certification
3/4/2022	Rachel Steyer	0.3	\$750	\$225	communications on teams with KGJ, DMS, TRB, GSL concerning outreach and declaration drafting	Class Certification
3/4/2022	Rachel Steyer	2.5	\$750	\$1,875	reviewing defendants' happy camper declarations, identifying and analyzing potential deponents	Class Certification
3/4/2022	Rachel Steyer	1.4	\$750	\$1,050	reviewing defendants' motion in opposition to plaintiffs motion for class cert	Pleadings and Motions Re: Pleadings
3/4/2022	Travis Close	1.4	\$850	\$1,190	biweekly team meeting with MTJ, GBW, co-counsel re: responding to brookdale's opposition to class cert motion	Case Organization, Planning and Strategy
3/4/2022	Travis Close	0.9	\$850	\$765	Analyze Brookdale's 10-ks for language re: operations, centralized control, and litigation risks	Case Organization, Planning and Strategy
3/4/2022	Travis Close	1.3	\$850	\$1,105	Continue drafting dec of kailes (section A. Brookdale's Argument that Ms. Kailes Did Not Follow Her Usual Methodology is Without Merit)	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/4/2022	Travis Close	1.3	\$850	\$1,105	Review and analyze Def's Opposition to Mtn for class certification	Experts (Including Retention)
3/4/2022	Travis Close	1.2	\$850	\$1,020	Review and analyze "happy camper" statements from brookdale residents, exhs. 1-199	Pleadings and Motions Re: Pleadings
3/4/2022	Travis Close	0.6	\$850	\$510	Review and analyze dec of Ali Saad iso D's opposition to class certification	Pleadings and Motions Re: Pleadings
3/5/2022	Guy Wallace	3.4	\$1,350	\$4,590	review and analysis of D's opposition to class certification; Declaration of Anderson; com's with MTJ re same (.8)	Class Certification
3/7/2022	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of Defendants' class cert opposition; Declaration of Jacobson; com's with MTJ re same	Class Certification
3/7/2022	Mark Johnson	0.2	\$1,150	\$230	review draft template of aggregated barrier list from K Stilber	Class Certification
3/7/2022	Mark Johnson	6.0	\$1,150	\$6,900	review and analyze D expert reports from Jacobsen, Saad and prepare outlines, notes on same	Class Certification
3/7/2022	Mark Johnson	0.3	\$1,150	\$345	email exchanges w/ COC re follow up on outstanding discovery; draft emails to OC re pending letter briefs and docs ordered but not produced.	Class Certification
3/7/2022	Mark Johnson	2.5	\$1,150	\$2,875	draft attachment to document subpoena for Doug Anderson; review Anderson declaration for same	Discovery (Non-Deposition)
3/7/2022	Mark Johnson	0.3	\$1,150	\$345	review responses to 8th set of doc requests and latest rogs; email to OC re meeting and conferring re same.	Discovery (Non-Deposition)
3/7/2022	Rachel Steyer	0.3	\$750	\$225	reviewing email from GBW summarizing relevant case law on ADA barriers and class certification	Class Certification
3/7/2022	Rachel Steyer	0.5	\$750	\$375	editing and revising GSL draft declaration	Class Certification
3/7/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising KGJ draft declaration	Class Certification
3/7/2022	Rachel Steyer	0.6	\$750	\$450	editing and revising GSL draft declaration	Class Certification
3/7/2022	Rachel Steyer	0.6	\$750	\$450	editing and revising GSL draft declaration	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/7/2022	Rachel Steyer	0.2	\$750	\$150	call with declarant to remind him to send copy of POA and sending authorization form for signature	Class Certification
3/7/2022	Rachel Steyer	0.2	\$750	\$150	follow up call with declarant to reschedule time to review remaining questions in draft declaration	Class Certification
3/7/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising DMS draft declaraiton	Class Certification
3/7/2022	Rachel Steyer	0.3	\$750	\$225	reviewing billing documentation provided by declarant, updating draft declaration	Class Certification
3/7/2022	Rachel Steyer	1.4	\$750	\$1,050	reviewing defendants' declarants, preparing chart and notes	Class Certification
3/7/2022	Rachel Steyer	0.2	\$750	\$150	reviewing KGJ completed intake to evaluate for declaration	Class Outreach and Contact
3/7/2022	Rachel Steyer	0.5	\$750	\$375	communications on teams with DMS, SLS, GSL, TRB, KGJ concnering outreach and declaration drafting	Class Outreach and Contact
3/7/2022	Rachel Steyer	0.2	\$750	\$150	call with GSL to discuss preparing declarant authorization forms	Discovery (Non-Deposition)
3/7/2022	Rachel Steyer	0.2	\$750	\$150	call with DMS to review and discuss preparing and gathering declarant authorization forms	Discovery (Non-Deposition)
3/7/2022	Rachel Steyer	0.3	\$750	\$225	reviewing production for documents corresponding to likely declarant	Discovery (Non-Deposition)
3/7/2022	Travis Close	1.5	\$850	\$1,275	Legal research re: whether scientific knowledge is required for an expert	Experts (Including Retention)
3/7/2022	Travis Close	1.2	\$850	\$1,020	Restructure Daubert opposition of June Kailes according to revised outline by GBW	Experts (Including Retention)
3/7/2022	Travis Close	1.3	\$850	\$1,105	Continue revising Kailes Dauber Opposition draft (re allegations that of "cherry picking" of materials or data)	Experts (Including Retention)
3/7/2022	Travis Close	1.6	\$850	\$1,360	Legal research re: cases in which Dr Ali Saad's testimony has been excluded	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/7/2022	Travis Close	0.8	\$850	\$680	Continue revising Kailes Dauber Opposition draft (re expert's opinion may be sufficiently reliable if it is based on his or her knowledge or experience)	Experts (Including Retention)
3/7/2022	Travis Close	0.8	\$850	\$680	Review and analyze Dec of Def's architectural expert in opposition to class cert	Pleadings and Motions Re: Pleadings
3/8/2022	Guy Wallace	3.5	\$1,350	\$4,725	review and analysis of Defendants' opposition to class certification; issues of corporate control and operation; declarations of Saad and Jacobson; com's with MTJ re same (.8)	Class Certification
3/8/2022	Rachel Steyer	0.2	\$750	\$150	question to GBW and MTJ about resident rights following review of declarant emails from DMS	Class Certification
3/8/2022	Rachel Steyer	0.6	\$750	\$450	editing and revising draft GSL declaration	Class Certification
3/8/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising draft DMS declaration	Class Certification
3/8/2022	Rachel Steyer	0.5	\$750	\$375	editing and revising draft GLS declaration	Class Certification
3/8/2022	Rachel Steyer	0.9	\$750	\$675	reviewing and analyzing and breaking down current vs. former declarant head count	Class Certification
3/8/2022	Rachel Steyer	0.4	\$750	\$300	called resident back, discussed case, interested in speaking/completing intake	Class Outreach and Contact
3/8/2022	Rachel Steyer	0.5	\$750	\$375	call with current resident, discussed case, interested in conducting intake, will send documents	Class Outreach and Contact
3/8/2022	Rachel Steyer	0.3	\$750	\$225	follow up call with current resident, discussed case, interested in completing intake	Class Outreach and Contact
3/8/2022	Rachel Steyer	0.2	\$750	\$150	communications on teams with RVR, SLS, DMS concerning outreach and declaration drafting	Class Outreach and Contact
3/8/2022	Rachel Steyer	0.5	\$750	\$375	reviewing and gathering documents in production corresponding to likely declarants	Discovery (Non-Deposition)
3/8/2022	Travis Close	0.2	\$850	\$170	Email to JY re: def's obligations under feb 3 court order to produce discovery	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/8/2022	Travis Close	0.4	\$850	\$340	Review and analyze transcript hearing from Feb 3 re: what defendants are ordered to search for	Discovery (Non-Deposition)
3/8/2022	Travis Close	1.2	\$850	\$1,020	Continue revising brief in opposition to motion to exclude June Kailes (Ms. Kailes' Opinions Are Properly Subject To Revision as the Case Advances)	Discovery (Non-Deposition)
3/8/2022	Travis Close	0.4	\$850	\$340	Review and analyze Def's latest responses to interrogatories and RFPs	Discovery (Non-Deposition)
3/8/2022	Travis Close	1.2	\$850	\$1,020	Continue revising Kailes opposition to Daubert brief (re: cherry-picked studies is not a proper basis for excluding testimony)	Experts (Including Retention)
3/8/2022	Travis Close	1.6	\$850	\$1,360	Legal research re: when is expert testimony permitted to opine on legal conclusions	Experts (Including Retention)
3/8/2022	Travis Close	1.5	\$850	\$1,275	Final revisions to Kailes brief before submitting draft to GBW for review	Experts (Including Retention)
3/8/2022	Travis Close	0.4	\$850	\$340	Review and analyze draft subpoena for Jacobsen (def's expert) & attachments	Experts (Including Retention)
3/8/2022	Travis Close	0.2	\$850	\$170	Email to GBW re: revisions to Kailes Daubert opposition	Pleadings and Motions Re: Pleadings
3/9/2022	Guy Wallace	1.8	\$1,350	\$2,430	prepare for and participate in zoom with JY; BBK; Ax; KS; BU; MTJ; TCC; RLS re oppositions to Brookdale's Daubert motions and reply re class certification	Class Certification
3/9/2022	Guy Wallace	3.4	\$1,350	\$4,590	review and analysis of Defendants' motion for class certification	Class Certification
3/9/2022	Guy Wallace	0.3	\$1,350	\$405	com's with Waters re Anderson Declaration	Class Certification
3/9/2022	Guy Wallace	2.9	\$1,350	\$3,915	review and analysis of Defendants' Daubert motion re Dr. Kennedy; preparation of responsive points re same	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/9/2022	Mark Johnson	1.0	\$1,150	\$1,150	team call w/ GBW, AX, BBK, JY, BU, KS, RLS, TCC etc. re tasks for class cert reply, analysis of D's filing, discovery	Class Certification
3/9/2022	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW re Kailes summary chart of local emergency docs, injunctive relief harm under ADA, language of Unruh Act re same.	Class Certification
3/9/2022	Rachel Steyer	1.2	\$750	\$900	weekly meeting with GBW, TCC, MTJ and co-counsel to prepare and discuss tasks and assignments in preparation for reply brief	Case Organization, Planning and Strategy
3/9/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising DMS draft declaration	Class Certification
3/9/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising DMS draft declaration	Class Certification
3/9/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising SLS draft declaration	Class Certification
3/9/2022	Rachel Steyer	0.3	\$750	\$225	communications between DMS, SLS, TRB concerning class outreach and declaration drafting	Class Outreach and Contact
3/9/2022	Travis Close	1.3	\$850	\$1,105	Continue revising Doug Cross Daubert Opposition brief (A.Brookdale's Transportation Policies)	Case Organization, Planning and Strategy
3/9/2022	Travis Close	1.2	\$850	\$1,020	Team meeting with GBW, MTJ, RLS, and co-counsel re: strategy for reply brief	Case Organization, Planning and Strategy
3/9/2022	Travis Close	1.6	\$850	\$1,360	Analyze and organize evidence of implementation of the fleet safety policy	Discovery (Non-Deposition)
3/9/2022	Travis Close	0.4	\$850	\$340	Review and analyze draft ninth set of doc requests	Discovery (Non-Deposition)
3/9/2022	Travis Close	1.5	\$850	\$1,275	Search for "Michael Johnson" and "Fleet Safety Policy"; review and analyze docs showing implementation of the FSP at the facilities	Discovery (Non-Deposition)
3/9/2022	Travis Close	1.0	\$850	\$850	Continue revising doug cross declaration (section: Background -- evidence that fleet safety policy applies to all facilitie and is implemented	Pleadings and Motions Re: Pleadings
3/10/2022	Guy Wallace	3.4	\$1,350	\$4,590	review and analysis of Defendants' class cert opposition	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/10/2022	Guy Wallace	0.6	\$1,350	\$810	revise and edit draft class member declaration from BBK; com's with BBK; RLS re same	Class Certification
3/10/2022	Guy Wallace	0.3	\$1,350	\$405	com's with Kennedy; Pettite re D's Daubert motion	Other Motions
3/10/2022	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of CASp Best Practices Manual; com's with MTJ re D's Daubert motion re Waters and Mastin	Other Motions
3/10/2022	Guy Wallace	2.3	\$1,350	\$3,105	review and analysis of Defendants' Daubert motion re Kennedy; Sunrise opinion re Kennedy and reply brief re same; preparation of outline of opposition; com's with MTJ re same (.5)	Other Motions
3/10/2022	Mark Johnson	0.9	\$1,150	\$1,035	call w GBW re issues of fact not disputed by Ds in class cert opposition, arguments in opposition to Ds motion to exclude Mastin and Waters declarations, D's section of joint letter brief re benchmark formula	Case Organization, Planning and Strategy
3/10/2022	Mark Johnson	0.2	\$1,150	\$230	further call w/ GBW re Ds arguments re site inspection methodology and CaSP best practices manual.	Case Organization, Planning and Strategy
3/10/2022	Mark Johnson	0.1	\$1,150	\$115	review and respond to email from Marks re preliminary results of further staffing analysis	Class Certification
3/10/2022	Mark Johnson	0.4	\$1,150	\$460	calls and emails w/ GBW re # facilities at issue, number of sites inspected, number of barriers identified	Class Certification
3/10/2022	Mark Johnson	1.5	\$1,150	\$1,725	review expert access reports, identify and total number of barriers identified and review for certain categories of barriers and expert approach to standards	Class Certification
3/10/2022	Mark Johnson	0.6	\$1,150	\$690	call w/ GBW re D's arguments in opposition to class certification and criticisms of Ps experts	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/10/2022	Mark Johnson	0.3	\$1,150	\$345	review and analyze D ltr and attachments re expert disclosures; com w/ RAB re downloading and distributing docs and data	Class Certification
3/10/2022	Mark Johnson	1.4	\$1,150	\$1,610	review and incorporate edits from COC Marks to Jacobson and Saad document descriptions for expert subpoenas; coms w/ LEC re finalizing and serving same; com w/ OC conveying final notice	Discovery (Non-Deposition)
3/10/2022	Mark Johnson	0.2	\$1,150	\$230	emails to OC re failure to provide D section of discovery letters, failure to respond to meet and confer request and failure to confirm completion of discovery ordered by court.	Discovery (Non-Deposition)
3/10/2022	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW re outline and arguments for response to D's motion to exclude Kennedy declaration iso class cert motion	Other Motions
3/10/2022	Mark Johnson	2.7	\$1,150	\$3,105	continue working on draft opp to D mtn to exclude Waters and Mastin depositions, including research for same	Other Motions
3/10/2022	Mark Johnson	0.2	\$1,150	\$230	email exchanges (x2) w/ J Yellin re joint discovery letter and D failure to provide their portion	Other Motions
3/10/2022	Mark Johnson	0.3	\$1,150	\$345	review and analyze D section of ltr brief on benchmark formula.	Other Motions
3/10/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising DMS draft declaration	Class Certification
3/10/2022	Rachel Steyer	0.3	\$750	\$225	call with KGJ to complete discussion and review of declaration drafting	Class Certification
3/10/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising co-counsel draft declaration	Class Certification
3/10/2022	Rachel Steyer	0.3	\$750	\$225	editing and finalizing DMS draft declaration	Class Certification
3/10/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising RDR draft declaration	Class Certification
3/10/2022	Rachel Steyer	0.2	\$750	\$150	email to RDR with feedback and questions on draft declaration	Class Certification
3/10/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising KGJ draft declaration	Class Certification
3/10/2022	Rachel Steyer	0.3	\$750	\$225	editing and reviewing KGJ draft declaration	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/10/2022	Rachel Steyer	0.6	\$750	\$450	reviewing documents corresponding to likely declarant	Class Certification
3/10/2022	Rachel Steyer	0.3	\$750	\$225	reviewing RVR completed intake	Class Outreach and Contact
3/10/2022	Rachel Steyer	0.3	\$750	\$225	communications on teams with SLS, DMS, RVR, TRB, KGJ, RDR, OJO concerning outreach and declaration drafting	Class Outreach and Contact
3/10/2022	Rachel Steyer	0.2	\$750	\$150	reviewing communications and document provided by potential declarant from RVR	Discovery (Non-Deposition)
3/10/2022	Travis Close	0.2	\$850	\$170	Email to MTJ re: discrepancy in count of facility inspections	Case Organization, Planning and Strategy
3/10/2022	Travis Close	1.4	\$850	\$1,190	Collect and review evidence explaining when Service Alignment 3.0 was implemented at all the CA facilities	Discovery (Non-Deposition)
3/10/2022	Travis Close	0.3	\$850	\$255	Review and analyze draft joint letter brief re: service alignment algorithms with Def's portion	Discovery (Non-Deposition)
3/10/2022	Travis Close	0.3	\$850	\$255	Email to MTJ, GBW re: emails showing implementation of SA 3.0	Discovery (Non-Deposition)
3/10/2022	Travis Close	1.2	\$850	\$1,020	Analyze my recorded count of brookdale inspections from 2020; compare to access reports submitted my architectural experts and note any discrepancies	Experts (Including Retention)
3/10/2022	Travis Close	1.1	\$850	\$935	Legal research re: whether courts need to accept other side's version of facts in ruling on motion to exclude expert	Experts (Including Retention)
3/10/2022	Travis Close	1.5	\$850	\$1,275	Continue revising Cross Daubert Opposition (background and qualifications to testify)	Experts (Including Retention)
3/10/2022	Travis Close	1.4	\$850	\$1,190	Continue revising Cross Daubert Opposition (D.Mr. Cross Was Not Legally Required to Adopt Defendants' Version of the Facts)	Experts (Including Retention)
3/11/2022	Guy Wallace	2.1	\$1,350	\$2,835	review and analysis of Defendants' opposition to class certification, including arguments re expert testimony, damages and manageability	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/11/2022	Guy Wallace	3.4	\$1,350	\$4,590	review and analysis of Declarations of Dr. Jacobson and Dr. Saad in opposition to class certification	Class Certification
3/11/2022	Guy Wallace	1.8	\$1,350	\$2,430	prepare for and participate in zoom with DTM; JT; BU; MTJ re Declarations of Dr. Saad and Dr. Jacobson and responses re same; preparation for opposition to Defendants Daubert motion re Dr. Flores and Dale Schroyer	Class Certification
3/11/2022	Guy Wallace	1.2	\$1,350	\$1,620	legal research and analysis re applicability of ADAAG to readily achievable barrier removal claims in existing facilities	Other Motions
3/11/2022	Guy Wallace	1.5	\$1,350	\$2,025	review and analysis of Declaration of Dr. Saad re damages model proposed by Dr. Kennedy	Other Motions
3/11/2022	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of Bowman Declaration and Boisen Declaration re Service Alignment System; com's with MTJ re same	Other Motions
3/11/2022	Mark Johnson	0.5	\$1,150	\$575	call w/ GBW re declarations provided by Ds from other cases re burden of producing SA formula; useful information in Boisen declaration for corporate control.	Case Organization, Planning and Strategy
3/11/2022	Mark Johnson	1.4	\$1,150	\$1,610	call w/ GBW, DM, JT re Jacobsen and Saad declarations iso opposition to class cert motion, criticisms of Schroyer and Flores, additional expertise	Class Certification
3/11/2022	Mark Johnson	1.0	\$1,150	\$1,150	work on revisions to joint discovery ltr re benchmark formula	Other Motions
3/11/2022	Rachel Steyer	0.3	\$750	\$225	call with RDR to discuss comments on draft declaration	Class Certification
3/11/2022	Rachel Steyer	0.2	\$750	\$150	call with declarant to try to follow up and reschedule read through call	Class Certification
3/11/2022	Rachel Steyer	0.2	\$750	\$150	email to declarant with follow up questions in advance of follow up call	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/11/2022	Rachel Steyer	0.3	\$750	\$225	call with RDR declarant to review follow up questions	Class Certification
3/11/2022	Rachel Steyer	0.2	\$750	\$150	finalizing draft RDR declaration	Class Certification
3/11/2022	Rachel Steyer	0.3	\$750	\$225	email to GBW and MTJ sending declarations for review and questions about declarants and potential class members	Class Certification
3/11/2022	Rachel Steyer	0.4	\$750	\$300	received call from resident, discussed case and plans for follow up call	Class Outreach and Contact
3/11/2022	Rachel Steyer	0.3	\$750	\$225	received call from family member of current resident, discussed case, interested in conducting intake	Class Outreach and Contact
3/11/2022	Rachel Steyer	0.3	\$750	\$225	reviewing and analyzing OJO partial intake	Class Outreach and Contact
3/11/2022	Rachel Steyer	0.3	\$750	\$225	call with family member of resident following up about status of arbitration, need to f/u with GBW and MTJ	Class Outreach and Contact
3/11/2022	Rachel Steyer	0.5	\$750	\$375	communications on teams with SLS, RDR, RVR, OJO concerning class outreach and draft declarations	Class Outreach and Contact
3/11/2022	Rachel Steyer	3.1	\$750	\$2,325	reviewing defendants' latest production of declarants' residnet files, updating spreadsheet	Discovery (Non-Deposition)
3/11/2022	Travis Close	1.4	\$850	\$1,190	Review and analyze depo testimony of Brookdale Executive Directors for info re: company wide intranet	Depositions
3/11/2022	Travis Close	2.1	\$850	\$1,785	Review and analyze Brookdale's disclosure of expert materials; create index and send to MTJ and co-counsel	Discovery (Non-Deposition)
3/11/2022	Travis Close	1.2	\$850	\$1,020	Finalize second draft of Cross Daubert opposition; send to GBW for review	Experts (Including Retention)
3/11/2022	Travis Close	1.3	\$850	\$1,105	Continue revising Doug Cross Dauber opposition brief (D.Mr. Cross Was Not Legally Required to Adopt Defendants' Version of the Facts)	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/11/2022	Travis Close	1.0	\$850	\$850	Continue revising Doug Cross Dauber opposition brief (E.Defendants' Argument Regarding "Industry Standards" is Irrelevant to the Legal Standards Set Forth in the U.S. Department of Justice and U.S. Department of Transportation Regulations)	Experts (Including Retention)
3/12/2022	Guy Wallace	0.7	\$1,350	\$945	review and analysis of issue re operations and corporate role re same; com's with MTJ re potential use of Dr. Martell re same	Class Certification
3/12/2022	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ re declaration of Dr. Saad and critique of data allegedly not used by Schroyer and issues re same	Class Certification
3/12/2022	Guy Wallace	0.3	\$1,350	\$405	com's with PK and LP; MTJ re Daubert motion re PK and response thereto	Class Certification
3/12/2022	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ re Defendants Form 10-K statements re operating facilities; legal research and analysis re same	Class Certification
3/12/2022	Guy Wallace	1.5	\$1,350	\$2,025	revise and edit draft of opposition to Daubert motion re Waters and Mastin	Other Motions
3/12/2022	Mark Johnson	0.8	\$1,150	\$920	call w/ GBW re IO expert in addition to Solomon re corporate structure and centralized control, waters/mastin Daubert motion	Class Certification
3/13/2022	Guy Wallace	0.3	\$1,350	\$405	review and analysis of com's from GG re D's admissions re operating the California assisted living facilities	Class Certification
3/13/2022	Guy Wallace	1.1	\$1,350	\$1,485	legal research and analysis re standard for "operator" or "manager" under Title III of the ADA	Class Certification
3/13/2022	Guy Wallace	1.9	\$1,350	\$2,565	review and analysis of Brookdale lease and management agreements; com's with MTJ re same (.8)	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/13/2022	Guy Wallace	0.6	\$1,350	\$810	revise and edit draft MTC re labor benchmark formula	Other Motions
3/13/2022	Guy Wallace	5.4	\$1,350	\$7,290	revise and edit draft of opposition to D's motion to exclude Mastin and Waters	Other Motions
3/13/2022	Guy Wallace	0.9	\$1,350	\$1,215	revise and edit opposition to Defendants' motion to exclude Declaration of Doug Cross	Other Motions
3/13/2022	Rachel Steyer	1.0	\$750	\$750	reviewing "happy camper" declarants and reviewing corresponding production to identify relevant documents, updating chart to assess potential deponents	Discovery (Non-Deposition)
3/14/2022	Guy Wallace	1.0	\$1,350	\$1,350	review and analysis of Defendants' Annual Reports and 10-K forms; com's with MTJ re same	Class Certification
3/14/2022	Guy Wallace	0.9	\$1,350	\$1,215	prepare for and participate in zoom with GG; AX; MTJ re issues regarding operator or owner, and corporate control	Class Certification
3/14/2022	Guy Wallace	0.2	\$1,350	\$270	com's with Bonner re documents showing acknowledgement of Fleet Safety Policy	Discovery (Non-Deposition)
3/14/2022	Guy Wallace	0.4	\$1,350	\$540	prepare for and participate in zoom with Solomon; AX; MTJ	Experts (Including Retention)
3/14/2022	Guy Wallace	0.3	\$1,350	\$405	com's with LP; MTJ re Daubert opposition; legal research re same	Experts (Including Retention)
3/14/2022	Guy Wallace	0.4	\$1,350	\$540	review and analysis of materials re transfer trauma; com's with PK; LP and MTJ re same	Misc. Research
3/14/2022	Guy Wallace	2.9	\$1,350	\$3,915	revise and edit draft opposition to Defendants' motion to exclude Cross	Other Motions
3/14/2022	Guy Wallace	0.9	\$1,350	\$1,215	revise and edit draft opposition to motion to exclude Kailes Declaration	Other Motions
3/14/2022	Guy Wallace	0.5	\$1,350	\$675	review and analysis of draft of opposition to motion to exclude Schroyer Declaration	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/14/2022	Mark Johnson	0.5	\$1,150	\$575	follow-up call w/ GBW re role of expert Solomon, evidence of control by Brookdale, 10Ks and annual reports.	Case Organization, Planning and Strategy
3/14/2022	Mark Johnson	0.7	\$1,150	\$805	Zoom call w GBW, GCG, AX re ownership v operator issue, evidence re same and strategy for call w/ expert	Class Certification
3/14/2022	Mark Johnson	0.4	\$1,150	\$460	review memo from GBW packaging evidence on control/operation by BKD of facilities.	Class Certification
3/14/2022	Mark Johnson	0.6	\$1,150	\$690	com w/ GBW re draft opposition to motion to exclude Schroyer declaration, acknowledgements of receipt of transportation policy, D revisions to joint discovery letter re benchmark formula	Class Certification
3/14/2022	Mark Johnson	0.4	\$1,150	\$460	emails w/ COC DM, JT and RAB, others re D expert disclosures on class cert declarations; review index of same, productions re laundry tasks, etc.	Class Certification
3/14/2022	Mark Johnson	0.3	\$1,150	\$345	email coms w/ BU re information for opposition to Daubert motions and declarations, discovery meet and confer history and demands, inadequacy in production to counter "cherry picking" arguments.	Class Certification
3/14/2022	Mark Johnson	0.3	\$1,150	\$345	emails w/ JMP re additional document searches for training materials and time studies for SA	Discovery (Non-Deposition)
3/14/2022	Mark Johnson	0.2	\$1,150	\$230	emails w/ LEC re compiling pleadings in related cases	Discovery (Non-Deposition)
3/14/2022	Mark Johnson	0.2	\$1,150	\$230	com w/ OSU re potential expert on industrial organization and control, locate and review resume, com w/ G BW re same	Experts (Including Retention)
3/14/2022	Mark Johnson	0.4	\$1,150	\$460	review draft of opposition to mtn to exclude Schroyer declaration iso class certification	Other Motions
3/14/2022	Mark Johnson	0.7	\$1,150	\$805	review and run comparison of D revisions to draft joint discovery ltr on benchmark formula; email to GBW and others re same.	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/14/2022	Mark Johnson	0.2	\$1,150	\$230	email exchanges w OC Erica Rutner re revision to joint ltr re benchmark formula	Other Motions
3/14/2022	Mark Johnson	4.0	\$1,150	\$4,600	work on opposition to Daubert motion to exclude Kennedy declaration iso class certification	Other Motions
3/14/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising DMS draft declaration	Class Certification
3/14/2022	Rachel Steyer	0.2	\$750	\$150	call with declarant to discuss follow up questions, she was unavailable so rescheduled call for next week	Class Certification
3/14/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising KGJ draft declaration	Class Certification
3/14/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising SLS draft declaration	Class Certification
3/14/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising GSL draft declaration	Class Certification
3/14/2022	Rachel Steyer	0.3	\$750	\$225	reviewing memo prepared by GBW and MTJ concerning corporate control and ownership facts	Class Certification
3/14/2022	Rachel Steyer	0.3	\$750	\$225	call with OJO to discuss intake quesitons and communications with residents	Class Outreach and Contact
3/14/2022	Rachel Steyer	0.2	\$750	\$150	communications on teams iwth DMS, SLS, GSL, KGJ, RDR concerning class outreach and protocol	Class Outreach and Contact
3/14/2022	Rachel Steyer	0.2	\$750	\$150	call with RDR to discuss procedures for preparing declarant authorization forms	Discovery (Non-Deposition)
3/14/2022	Rachel Steyer	5.0	\$750	\$3,750	reviewing production for documents corresponding to happy camper declarants, updating information in chart, analyzing potential deponents	Discovery (Non-Deposition)
3/14/2022	Travis Close	0.2	\$850	\$170	Email to MTJ, GBW re: more issues with Saad production	Case Organization, Planning and Strategy
3/14/2022	Travis Close	0.4	\$850	\$340	Review and analyze BMU's draft opposition to motion to exclue testimony of Dale Schroyer	Case Organization, Planning and Strategy
3/14/2022	Travis Close	0.3	\$850	\$255	Review and analyze revised draft letter brief re: SA algorithms & software with def's section added, Ps' revised section added	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/14/2022	Travis Close	0.5	\$850	\$425	Analyze related case decisions cited by Defs for argument that SA software is proprietary and hard to produce	Discovery (Non-Deposition)
3/14/2022	Travis Close	0.5	\$850	\$425	Analyze docs found by JMP re: service alignment time studies and training materials	Discovery (Non-Deposition)
3/14/2022	Travis Close	1.7	\$850	\$1,445	Create chart of cites for Kailes Daubert Opposition for drafting TCC Dec	Pleadings and Motions Re: Pleadings
3/14/2022	Travis Close	1.3	\$850	\$1,105	Create chart of cites for Cross Daubert Opposition for drafting TCC Dec	Pleadings and Motions Re: Pleadings
3/15/2022	Guy Wallace	0.6	\$1,350	\$810	com's with Dr. Kennedy; MTJ re preparation of opposition to exclude Dr. Kennedy's declaration	Experts (Including Retention)
3/15/2022	Guy Wallace	6.7	\$1,350	\$9,045	revise and edit opposition to motion to exclude June Kailes' Declaration	Other Motions
3/15/2022	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ re opposition to motion to exclude Dr. Kennedy	Other Motions
3/15/2022	Guy Wallace	0.5	\$1,350	\$675	com's with BU; JY; DTM re draft of opposition to motion to exclude Schroyer	Other Motions
3/15/2022	Guy Wallace	0.5	\$1,350	\$675	revise and edit opposition to motion to exclude Cross Declaration	Other Motions
3/15/2022	Mark Johnson	0.2	\$1,150	\$230	email coms w/ J Yelin, AX re meet and confer strategy for outstanding discovery, letter briefs, depo dates, expanding deposition number.	Discovery (Non-Deposition)
3/15/2022	Mark Johnson	0.8	\$1,150	\$920	review and finalize joint ltr brief re benchmark formula; emails w/ RAB and LEC re redactions and exhibits, locate and include exhbts; emails to OC re filing, redactions, motion to file under seal	Other Motions
3/15/2022	Mark Johnson	0.4	\$1,150	\$460	call w/ P Kennedy, GBW re issues raised by Ds in Kennedy Daubert motion	Other Motions
3/15/2022	Mark Johnson	1.0	\$1,150	\$1,150	review D's sections of 4 joint discovery ltr briefs (.9), email COC re same (.1)	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/15/2022	Mark Johnson	7.5	\$1,150	\$8,625	work on opposition to Brookdale's Daubert motion for Kennedy	Other Motions
3/15/2022	Rachel Steyer	0.3	\$750	\$225	editing and finalizing GSL draft declaration	Class Certification
3/15/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising GSL draft declaration	Class Certification
3/15/2022	Rachel Steyer	0.6	\$750	\$450	editing and revising RVR draft declaration	Class Certification
3/15/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising SLS draft declaration	Class Certification
3/15/2022	Rachel Steyer	0.6	\$750	\$450	reviewing produciton for documents corresponding to defndants happy camper declarants	Class Certification
3/15/2022	Rachel Steyer	0.5	\$750	\$375	reviewing and editing OJO completed intake	Class Outreach and Contact
3/15/2022	Rachel Steyer	0.4	\$750	\$300	received call back from current resident, discussed case, he would still like a few more weeks to review and consider his options	Class Outreach and Contact
3/15/2022	Rachel Steyer	0.9	\$750	\$675	communications on teams with TRB, OJO, SLS, TBS, RVR, RDR, DMS, GSL concerning outreach efforts and declaration drafting questions	Class Outreach and Contact
3/15/2022	Rachel Steyer	0.2	\$750	\$150	reviewing production for documents corresponding to likely declarant	Discovery (Non-Deposition)
3/15/2022	Rachel Steyer	0.6	\$750	\$450	reviewing defendants portions of joint discovery letter briefs	Discovery (Non-Deposition)
3/15/2022	Rachel Steyer	0.3	\$750	\$225	response to co-counsel and GBW, TCC, MTJ concerning responding to defendants joint letter brief regarding class outreach	Discovery (Non-Deposition)
3/15/2022	Rachel Steyer	0.3	\$750	\$225	email to MTJ with additional thoughts concerning defendants letter brief of class contact	Discovery (Non-Deposition)
3/15/2022	Travis Close	0.3	\$850	\$255	Call to LEC re: transcripts for Kailes and Cross daubert opposition briefs	Case Organization, Planning and Strategy
3/15/2022	Travis Close	0.4	\$850	\$340	Email to LEC re: depo transcripts to start pulling for Cross and Kailes daubert opposition briefs	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/15/2022	Travis Close	0.5	\$850	\$425	Analyze depo transcript of June Kailes for info re: how many supplemental forms she reviewed before/after submitting declaration	Discovery (Non-Deposition)
3/15/2022	Travis Close	1.5	\$850	\$1,275	Review and nalyze Brookdale's evidenc of local trasnportation policies filed with their Opposition to Class Cert	Experts (Including Retention)
3/15/2022	Travis Close	1.3	\$850	\$1,105	Review and analyze Brookdale's evidence of local emergency evacuation policies files with their Opposition	Experts (Including Retention)
3/15/2022	Travis Close	0.8	\$850	\$680	Update cites to Westlaw for Kailes daubert opposition briefi	Experts (Including Retention)
3/15/2022	Travis Close	1.4	\$850	\$1,190	Further revisions to latest draft of Kailes Opposition to Daubert motion	Pleadings and Motions Re: Pleadings
3/15/2022	Travis Close	1.4	\$850	\$1,190	Draft dec of TCC in support of Ps' opposition to D's motion to exclude Dec of June Kailes	Pleadings and Motions Re: Pleadings
3/16/2022	Guy Wallace	0.9	\$1,350	\$1,215	prepare for and participate in zoom with GG; JY; BBK; AX; EH; BU; MTJ; TCC; RLS re preparation of opposition to Defendants' Daubert motions; evidence re corporate control, operation or management; preparation for depositions	Class Certification
3/16/2022	Guy Wallace	2.9	\$1,350	\$3,915	revise and edit opposition to motion to exclude Cross Declaration	Other Motions
3/16/2022	Guy Wallace	0.6	\$1,350	\$810	review and analysis of oppositions to discovery letter briefs from Jacobson; D's request for relief re protective order re class members; com's with MTJ re same	Other Motions
3/16/2022	Guy Wallace	4.6	\$1,350	\$6,210	revise and edit draft opposition to motion to exclude Dr. Flores	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/16/2022	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ; TCC; TBS re preparation of oppositions to Defendants' motions to exclude Plaintiffs' expert witnesses	Other Motions
3/16/2022	Guy Wallace	0.6	\$1,350	\$810	review and analysis of draft opposition to motion to exclude Schroyer	Other Motions
3/16/2022	Guy Wallace	0.9	\$1,350	\$1,215	revise and edit draft Close Declaration in support of oppositions to exclude Declarations of Cross and Kailes	Other Motions
3/16/2022	Guy Wallace	1.3	\$1,350	\$1,755	revise and edit opposition to motion to exclude Schroyer Declaration	Other Motions
3/16/2022	Mark Johnson	0.9	\$1,150	\$1,035	team call w/ COC and firm re tasks and assignments for reply iso class certification, expert depositions, declarant depositions, etc.	Case Organization, Planning and Strategy
3/16/2022	Mark Johnson	1.1	\$1,150	\$1,265	meet and confer session w/ M Jacobsen, JY, AX re expert depositions, expanding depo cap, 8th set of document requests	Class Certification
3/16/2022	Mark Johnson	0.3	\$1,150	\$345	finish meet and confer re rog and rfp responses w/ AX and Jacobsen	Communications With Opposing Counsel
3/16/2022	Mark Johnson	0.4	\$1,150	\$460	call w/ JY and AX re strategy for meet and confer w/ OC re depositions, rog responses and document requests	Discovery (Non-Deposition)
3/16/2022	Mark Johnson	0.2	\$1,150	\$230	follow up call w/ AX re meet and confer w/ oc and follow up	Discovery (Non-Deposition)
3/16/2022	Mark Johnson	0.6	\$1,150	\$690	review draft opposition to motion to exclude Cross declaration.	Other Motions
3/16/2022	Mark Johnson	3.2	\$1,150	\$3,680	work on opposition to motion to exclude Kennedy declaration	Other Motions
3/16/2022	Mark Johnson	4.5	\$1,150	\$5,175	continue working on opposition to motion to exclude Kennedy declaration	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/16/2022	Rachel Steyer	0.8	\$750	\$600	weekly strategy meeting with GBW, TCC, MTJ and co-counsel to review and discuss tasks and assignments in preparation for reply brief	Case Organization, Planning and Strategy
3/16/2022	Rachel Steyer	0.3	\$750	\$225	editing and finalizing DMS draft declaration	Class Certification
3/16/2022	Rachel Steyer	0.2	\$750	\$150	email to GBW and MTJ passing along draft declarations for review	Class Certification
3/16/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising KGJ draft declaration	Class Certification
3/16/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising RDR draft declaration	Class Certification
3/16/2022	Rachel Steyer	0.3	\$750	\$225	fielded call from current resident who called in, discussed case, interested in setting up intake	Class Outreach and Contact
3/16/2022	Rachel Steyer	0.3	\$750	\$225	call with DMS to discuss and review outstanding outreach and declaration drafting questions	Class Outreach and Contact
3/16/2022	Rachel Steyer	0.4	\$750	\$300	communications on teams with memebrs of outreach team on outreach, quesitons about declaration drafting and intakes	Class Outreach and Contact
3/16/2022	Rachel Steyer	2.7	\$750	\$2,025	reviewing "happy camper" declarants and reviewing production to identify relevant documents, updating spreadsheet to determine strenght of potential deponents	Discovery (Non-Deposition)
3/16/2022	Travis Close	1.8	\$850	\$1,530	Continue drafting dec of TCC in support of Daubert Opposition briefs for Kailes and Cross	Case Organization, Planning and Strategy
3/16/2022	Travis Close	2.0	\$850	\$1,700	Review, analyze, and check cites for latest draft of Cross brief following GBW revisions	Discovery (Non-Deposition)
3/16/2022	Travis Close	0.4	\$850	\$340	Meet w/ LEC re: tables for Kailes and Cross briefs	Pleadings and Motions Re: Pleadings
3/16/2022	Travis Close	0.2	\$850	\$170	Call with GBW re: edits to Cross daubert opposition brief	Pleadings and Motions Re: Pleadings
3/16/2022	Travis Close	0.1	\$850	\$85	Email to LEC re: Kailes brief ready for tables	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/16/2022	Travis Close	1.2	\$850	\$1,020	Review, analyze, and check cites for latest draft of Kailes brief following GBW revisions	Pleadings and Motions Re: Pleadings
3/16/2022	Travis Close	0.7	\$850	\$595	Add westlaw cites to Cross brief where Lexis cites are currently (per Judge Gilliam's standing order)	Pleadings and Motions Re: Pleadings
3/16/2022	Travis Close	0.1	\$850	\$85	Email to LEC re: Cross daubert brief ready for tables	Pleadings and Motions Re: Pleadings
3/16/2022	Travis Close	0.9	\$850	\$765	Team meeting with GBW, MTJ, RLS, and co-counsel re strategy for reply brief	Pleadings and Motions Re: Pleadings
3/16/2022	Travis Close	1.2	\$850	\$1,020	Continue locating exhibits for dec of tcc iso June Kailes and Doug Cross briefs in opposition to daubert motions	Pleadings and Motions Re: Pleadings
3/17/2022	Guy Wallace	5.9	\$1,350	\$7,965	revise and edit opposition to motion to exclude Schroyer declaration; com's with BU re same (.5)	Other Motions
3/17/2022	Guy Wallace	0.6	\$1,350	\$810	review and analysis of further declaration of declaration of Close in support of oppositions to motions to exclude Cross and Kailes; com's with MTJ and TCC re same	Other Motions
3/17/2022	Guy Wallace	1.4	\$1,350	\$1,890	revise and edit draft declaration of Schroyer in support of opposition to exclude Schroyer declaration; com's with DTM; BU; MTJ re same	Other Motions
3/17/2022	Guy Wallace	1.5	\$1,350	\$2,025	revise and edit draft opposition to motion to exclude Kennedy Declaration; com's with PK and MTJ re same	Other Motions
3/17/2022	Mark Johnson	7.5	\$1,150	\$8,625	work on opposition to exclude P Kennedy declaration iso class cert, including coms w/ GBW and PK re same, review memo from PK on Conjoint analysis, incorporate additional input from PK, legal research	Other Motions
3/17/2022	Mark Johnson	2.8	\$1,150	\$3,220	revise and finalize opposition to mtn to exclude Waters and Mastin declarations; draft declaration iso same, research for same.	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/17/2022	Travis Close	0.2	\$850	\$170	Email to LEC re: revisions to tables for Kailes brief	Case Organization, Planning and Strategy
3/17/2022	Travis Close	0.2	\$850	\$170	Email to RLS re: revisions to Kailes and Cross briefs	Case Organization, Planning and Strategy
3/17/2022	Travis Close	0.2	\$850	\$170	Email to GBW re: final versions of Kailes and Cross briefs	Case Organization, Planning and Strategy
3/17/2022	Travis Close	1.2	\$850	\$1,020	Further revisions to Close Dec iso Kailes and Cross opposition daubert briefs	Case Organization, Planning and Strategy
3/17/2022	Travis Close	0.4	\$850	\$340	Review and analyze Close Dec for accurate exhibits	Case Organization, Planning and Strategy
3/17/2022	Travis Close	1.5	\$850	\$1,275	Final read-through & revisions of Kailes daubert opposition brief	Pleadings and Motions Re: Pleadings
3/17/2022	Travis Close	1.7	\$850	\$1,445	Final read-through & revisions of Corss daubert opposition brief	Pleadings and Motions Re: Pleadings
3/18/2022	Guy Wallace	6.1	\$1,350	\$8,235	revise and edit opposition to Defendants' motion to exclude Kennedy declaration	Other Motions
3/18/2022	Guy Wallace	0.6	\$1,350	\$810	com's with BU; MTJ re preparation of oppositions to Defendants' motions to strike Plaintiffs' experts	Other Motions
3/18/2022	Guy Wallace	0.5	\$1,350	\$675	revise and edit opposition to Defendants' motion to strike declarations of Mastin and Waters	Other Motions
3/18/2022	Guy Wallace	0.8	\$1,350	\$1,080	revise and edit draft declaration of Dr. Flores re Defendants' motion to exclude; com's with DTM; JT; BU; MTJ re same	Other Motions
3/18/2022	Guy Wallace	3.4	\$1,350	\$4,590	revise and edit further draft from MTJ of opposition to motion to exclude Kennedy declaration	Other Motions
3/18/2022	Mark Johnson	1.0	\$1,150	\$1,150	begin depo prep for Ali Saad - review of index of disclosure production; coms w/ RAB re same, review beginning of outline	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/18/2022	Mark Johnson	5.4	\$1,150	\$6,210	work on opp to mtn to exclude Kennedy dec iso class cert; coms w/ GBW re same, review and incorporate edits, line edit and proof and locate and enter citations to the record, finalize and com w/ LEC re tables, filing	Other Motions
3/18/2022	Mark Johnson	0.6	\$1,150	\$690	emails and calls w/ J Thornton and B Umpierre re docs and data relevant to Schroiyyer and Flores declarations and mtns to exclude expert declarations.	Other Motions
3/18/2022	Rachel Steyer	0.3	\$750	\$225	editing and reviewing KGJ draft declaration	Class Certification
3/18/2022	Rachel Steyer	0.3	\$750	\$225	call with OJO to discuss questions posed by class member responsible party	Class Outreach and Contact
3/18/2022	Rachel Steyer	0.4	\$750	\$300	received call from responsible party of current resident, discussed case, interested in conducting intake	Class Outreach and Contact
3/18/2022	Rachel Steyer	0.3	\$750	\$225	reviewing and editing OJO completed intake	Class Outreach and Contact
3/18/2022	Rachel Steyer	0.3	\$750	\$225	received call back from current resident, discussed case, interested in conducting intake	Class Outreach and Contact
3/18/2022	Rachel Steyer	0.5	\$750	\$375	communications on teams with GSL, SFC, OJO, DMS, KGJ to discuss outreach questions and declaration drafting	Class Outreach and Contact
3/18/2022	Rachel Steyer	0.3	\$750	\$225	reviewing electronic production for documents corresponding to potential declarant	Discovery (Non-Deposition)
3/18/2022	Rachel Steyer	0.5	\$750	\$375	reviewing production for documents corresponding to potential declarant	Discovery (Non-Deposition)
3/18/2022	Rachel Steyer	3.2	\$750	\$2,400	reviewing documents in production corresponding to happy camper declarants, updating chart and analyzing declarants to determine best deponents	Discovery (Non-Deposition)
3/19/2022	Mark Johnson	0.5	\$1,150	\$575	review Flores declaration iso opposition to Daubert mtn as prep for Saad depo.	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/20/2022	Guy Wallace	3.2	\$1,350	\$4,320	review and analysis of Defendants' arguments against class certification; preparation of reply arguments and points	Class Certification
3/20/2022	Rachel Steyer	2.6	\$750	\$1,950	reviewing "happy camper" declarants and production to identify relevant documents, updating chart and analyzing for best potential deponents	Discovery (Non-Deposition)
3/21/2022	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re further discovery motions; Anderson depo; Defendants' production of documents re Dr. Saad	Class Certification
3/21/2022	Mark Johnson	0.2	\$1,150	\$230	com w/ BBK re assistance in preparing for Saad depo	Depositions
3/21/2022	Mark Johnson	0.3	\$1,150	\$345	GTM call with Blake Peters, Jim Thornton and others re data produced by Ds for Saad disclosures for depo	Depositions
3/21/2022	Mark Johnson	0.3	\$1,150	\$345	draft email to OC re scheduling of expert depositions; com w/ GBW and JT re same, modify and send same	Depositions
3/21/2022	Mark Johnson	0.8	\$1,150	\$920	review index of Saad production and docs/data from same for depo prep	Depositions
3/21/2022	Mark Johnson	0.1	\$1,150	\$115	email exchanges w/ DSS counsel and LEC re production responsive to DSS CAB document subpoena	Discovery (Non-Deposition)
3/21/2022	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW re three joint discovery letters + defendants' draft ltr	Other Motions
3/21/2022	Mark Johnson	0.8	\$1,150	\$920	draft proposed order on mtn to compel benchmark formula; com w/ LEC re finalizing and filing same	Other Motions
3/21/2022	Mark Johnson	0.3	\$1,150	\$345	follow up call w/ GBW re revisions to P section of MTC re local transportation policies, banking info and physical modifications to facilities.	Other Motions
3/21/2022	Mark Johnson	3.6	\$1,150	\$4,140	revise P section of joint letter brief re local transportation policies, physical modification of facilities and banking information	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/21/2022	Mark Johnson	1.2	\$1,150	\$1,380	review transportation-related docs filed by Ds with class cert opposition for revisions to draft mtc letter re same	Other Motions
3/21/2022	Rachel Steyer	0.2	\$750	\$150	call with DMS to discuss status of draft declaration	Class Certification
3/21/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising DMS draft declaration	Class Certification
3/21/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising KGJ draft declaration	Class Certification
3/21/2022	Rachel Steyer	0.6	\$750	\$450	call with declarant to go over and review outstanding question before finalizing draft declaration	Class Certification
3/21/2022	Rachel Steyer	0.7	\$750	\$525	finishing drafting declaration following call with declarant to review outstanding questions	Class Certification
3/21/2022	Rachel Steyer	0.2	\$750	\$150	call with DMS to discuss and review her outreach assignments for the week	Class Outreach and Contact
3/21/2022	Rachel Steyer	0.5	\$750	\$375	reviewing OJO completed intake	Class Outreach and Contact
3/21/2022	Rachel Steyer	0.5	\$750	\$375	call with OJO to discuss and review quesitons in completed intake	Class Outreach and Contact
3/21/2022	Rachel Steyer	0.5	\$750	\$375	communications on teams with DMS, SLS, KGJ, GSL, OJO concerning completing intakes and drafting declarations	Class Outreach and Contact
3/21/2022	Rachel Steyer	0.2	\$750	\$150	reviewing OJO intake	Class Outreach and Contact
3/21/2022	Travis Close	0.4	\$850	\$340	Call to june kailes re: reply brief needed for Dec; schedule further time to talk	Case Organization, Planning and Strategy
3/21/2022	Travis Close	0.6	\$850	\$510	Analyze overview of contents in Saad production in advance of call with RAB, staffing experts	Case Organization, Planning and Strategy
3/21/2022	Travis Close	1.4	\$850	\$1,190	Analyze resident files produced for evidence of complaints to brookdale management: Eleanore Reiner, Loise Goode, Helen Costantino, Roger Lindholm, Pauline Garduna	Discovery (Non-Deposition)
3/21/2022	Travis Close	1.5	\$850	\$1,275	Analyze records of 12-month income statements and other budget reports for evidence of contracted staffing expenses/hours	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/21/2022	Travis Close	0.6	\$850	\$510	Review and analyze Ps' opposition to motion to exclude testimony of Gary Waters and Jeff Mastin	Pleadings and Motions Re: Pleadings
3/21/2022	Travis Close	0.6	\$850	\$510	Review and analyze Ps' opposition to Motion to Exclude dec and testimony of Dale Schroyer	Pleadings and Motions Re: Pleadings
3/21/2022	Travis Close	0.8	\$850	\$680	Review and analyze Ps' opposition to Motion to Exclude dec and testimony of Cristina Flores + exhibits	Pleadings and Motions Re: Pleadings
3/21/2022	Travis Close	0.7	\$850	\$595	Review and analyze Ps' opposition to Motion to Exclude dec and testimony of Patrick Kennedy + exhibits	Pleadings and Motions Re: Pleadings
3/22/2022	Guy Wallace	0.7	\$1,350	\$945	review and analysis of further motions to compel from JY; MTJ; revise and edit same and com's re same	Other Motions
3/22/2022	Mark Johnson	0.6	\$1,150	\$690	email communications w/ Thornton, RAB re issues with data files produced by defendants from Saad production; coms w/ GBW re same	Class Certification
3/22/2022	Mark Johnson	0.7	\$1,150	\$805	check all data files on sharepoint identified by Thornton as being empty or unable to be opened	Class Certification
3/22/2022	Mark Johnson	4.7	\$1,150	\$5,405	depo prep for Saad depo - further analysis of Saad declaration and begin preparation of outline	Depositions
3/22/2022	Mark Johnson	0.3	\$1,150	\$345	email exchanges w/ GLM re expert depo schedule, Saad suboena.	Depositions
3/22/2022	Mark Johnson	0.2	\$1,150	\$230	email coms w/ LEC, Titan and DSS counsel re response to document subpoena by DSS	Discovery (Non-Deposition)
3/22/2022	Mark Johnson	0.3	\$1,150	\$345	review draft of P revised section of letter brief on operations plans and propose revisions to same	Other Motions
3/22/2022	Mark Johnson	0.8	\$1,150	\$920	revise and finalize ltr brief P sections on J-H rogs set one based on email input from JY, GBW	Other Motions
3/22/2022	Rachel Steyer	0.9	\$750	\$675	call with OJO to discuss and review declaration drafting	Class Certification
3/22/2022	Rachel Steyer	0.6	\$750	\$450	editing and revising OJO draft declaration	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/22/2022	Rachel Steyer	0.3	\$750	\$225	call with responsible party of current resident, discussed case, interested in intake	Class Outreach and Contact
3/22/2022	Rachel Steyer	0.4	\$750	\$300	reviewing production for documents corresponding to likely declarants	Discovery (Non-Deposition)
3/22/2022	Rachel Steyer	4.2	\$750	\$3,150	reviewing and analyzing happy camper declarants, reviewing production for relevant documents, updating chart	Discovery (Non-Deposition)
3/22/2022	Travis Close	0.2	\$850	\$170	Email to MTJ re: strategy for joint letter brief on local transportation policies	Case Organization, Planning and Strategy
3/22/2022	Travis Close	0.5	\$850	\$425	Analyze Def's representations in Opposition to Motion for Class Cert re: local transportation policeis	Case Organization, Planning and Strategy
3/22/2022	Travis Close	0.6	\$850	\$510	Review, analyze & revise latest version of draft letter brief re: plans of operation	Discovery (Non-Deposition)
3/22/2022	Travis Close	1.7	\$850	\$1,445	Compile and organize all Emergency and Disaster Forms from Defendants' productions	Discovery (Non-Deposition)
3/22/2022	Travis Close	1.8	\$850	\$1,530	Compile and organize all Supplemental Emergency and Disaster Forms from Defendants' productions	Discovery (Non-Deposition)
3/22/2022	Travis Close	0.4	\$850	\$340	Analyze Def's representations in Opposition to Motion for Class Cert re: local emergency evacuation policeis	Discovery (Non-Deposition)
3/22/2022	Travis Close	0.6	\$850	\$510	Review and analyze recent DSS facility evaluation and complaint investigation reports for North Tarzana, Murrieta, Oceanside, Tracy, Auburn, Folsom facilities	Discovery (Non-Deposition)
3/23/2022	Guy Wallace	0.8	\$1,350	\$1,080	prepare for and participate in zoom with GG; JY; BBK; AX; BU; MTJ; TCC; RLS re discovery motions; analysis of management agreements; preparation of reply on class certification	Class Certification
3/23/2022	Guy Wallace	0.5	\$1,350	\$675	com's with Finberg; Cervantez; Larkin; JGK; MTJ re deposition of Dr. Saad and preparation re same	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/23/2022	Mark Johnson	0.5	\$1,150	\$575	team zoom mtg re class cert reply tasks, expert depositions, outstanding discovery motions or potential motions.	Class Certification
3/23/2022	Mark Johnson	4.7	\$1,150	\$5,405	work on P section of letter brief re communications with class members	Other Motions
3/23/2022	Rachel Steyer	0.7	\$750	\$525	meeting with co-counsel and GBW, MTJ, TCC concerning ongoing tasks and assignments in preparation for reply motion	Case Organization, Planning and Strategy
3/23/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising GSL draft declaration	Class Certification
3/23/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising GSL draft declaration	Class Certification
3/23/2022	Rachel Steyer	0.3	\$750	\$225	editing and reviewing DMS draft declaration	Class Certification
3/23/2022	Rachel Steyer	0.2	\$750	\$150	call with OJO to discuss double checking named plaintiffs and former declarants to not contact	Class Outreach and Contact
3/23/2022	Rachel Steyer	0.3	\$750	\$225	email to outreach team (GSL, KGJ, DMS, OJO, SLS), TRB regarding screening sharepoint assignments for individuals to not contact	Class Outreach and Contact
3/23/2022	Rachel Steyer	0.2	\$750	\$150	received call back from responsible party of current residnet, interested in speaking	Class Outreach and Contact
3/23/2022	Rachel Steyer	0.3	\$750	\$225	reviewing OJO completed intake	Class Outreach and Contact
3/23/2022	Rachel Steyer	0.3	\$750	\$225	reviewing OJO completed intake	Class Outreach and Contact
3/23/2022	Rachel Steyer	0.4	\$750	\$300	communications on teams with OJO, DMS, GSL concerning outreach and declaration drafting	Class Outreach and Contact
3/23/2022	Rachel Steyer	0.2	\$750	\$150	reviewing production for documents corresponding to likely and potential declarants	Discovery (Non-Deposition)
3/23/2022	Rachel Steyer	0.4	\$750	\$300	reviewing production for documents corresponding to potential declarants	Discovery (Non-Deposition)
3/23/2022	Rachel Steyer	2.3	\$750	\$1,725	reviewing happy camper declarants, reviewing production for documents corresponding to them, analyzing and updating chart to identify potential deponents	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/23/2022	Travis Close	0.7	\$850	\$595	Meeting with co-counsel re: strategy for reply brief, upcoming discovery hearing with judge beeler	Case Organization, Planning and Strategy
3/23/2022	Travis Close	1.7	\$850	\$1,445	Analyze supplemental emergency evacuation forms for evidence of details re: assistance with helping people with disabilities to safe areas	Case Organization, Planning and Strategy
3/23/2022	Travis Close	1.5	\$850	\$1,275	Legal research re: whether people with dementia are competent to sit for deposition	Case Organization, Planning and Strategy
3/23/2022	Travis Close	0.4	\$850	\$340	Review, analyze, and revise latest ver of joint letter brief re: Bernie Jestrabek-Hart's ROGs responses	Discovery (Non-Deposition)
3/24/2022	Guy Wallace	0.3	\$1,350	\$405	revise and edit opposition to Defendants' motion re class member communications; com's with MTJ re same	Other Motions
3/24/2022	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ; JY re discovery hearing with MJ Beeler; review and analysis of order re same	Other Motions
3/24/2022	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re docs for expert depositions, pending and possible discovery mtns	Case Organization, Planning and Strategy
3/24/2022	Mark Johnson	2.0	\$1,150	\$2,300	review docs produced in response to subpoena on Anderson	Depositions
3/24/2022	Mark Johnson	1.5	\$1,150	\$1,725	prep for hearing on mtn re benchmark formula	Other Motions
3/24/2022	Mark Johnson	2.0	\$1,150	\$2,300	hearing on mtn to compel benchmark formula	Other Motions
3/24/2022	Mark Johnson	0.5	\$1,150	\$575	call w/ GBW - briefing on hearing on mtc benchmark formula, strategy for addressing same	Other Motions
3/24/2022	Mark Johnson	0.3	\$1,150	\$345	research FRCP & local rules re review of MJ decision, email w/ COC re same	Other Motions
3/24/2022	Mark Johnson	0.4	\$1,150	\$460	emails w/ COC (x2) before and after oral argument on mtc benchark formula re strategy for argument and summary of argument	Other Motions
3/24/2022	Rachel Steyer	0.2	\$750	\$150	call with OJO to review completed intakes and discuss declaration drafting	Class Certification
3/24/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising RDR draft declaration	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/24/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising DMS draft declaration	Class Certification
3/24/2022	Rachel Steyer	0.2	\$750	\$150	call with DMS to discuss specific outreach questiosn	Class Outreach and Contact
3/24/2022	Rachel Steyer	0.2	\$750	\$150	reviewing KJG completed intake	Class Outreach and Contact
3/24/2022	Rachel Steyer	0.3	\$750	\$225	call with KGJ to review and discuss completed intake	Class Outreach and Contact
3/24/2022	Rachel Steyer	0.2	\$750	\$150	communications on teasm with KGJ, DMS, OJO, RDR about outreach and declaration drafting	Class Outreach and Contact
3/24/2022	Rachel Steyer	0.2	\$750	\$150	reviewing production for documents corresponding to likely declarant	Discovery (Non-Deposition)
3/24/2022	Rachel Steyer	4.2	\$750	\$3,150	reviewing happy camper declarants, revirewing production for relevant documents, updating chart	Discovery (Non-Deposition)
3/24/2022	Travis Close	1.2	\$850	\$1,020	Legal research re: whether assembly areas & relocation sites are required for assisted living facilities under california law	Case Organization, Planning and Strategy
3/24/2022	Travis Close	1.7	\$850	\$1,445	Begin index of evidence of local transportation policies from def's Opposition (for Cross Reply Dec)	Discovery (Non-Deposition)
3/24/2022	Travis Close	0.3	\$850	\$255	Email to ESI requests re: search needed for insurance policies related to transportation access at Brookdale facilities	Discovery (Non-Deposition)
3/24/2022	Travis Close	0.2	\$850	\$170	Email to EPO re: entity agreement analysis to share with co-counsel	Discovery (Non-Deposition)
3/24/2022	Travis Close	1.1	\$850	\$935	Call with june kailes re: work needed for reply declaration	Pleadings and Motions Re: Pleadings
3/25/2022	Guy Wallace	0.5	\$1,350	\$675	com's with JT; MTJ re preparation for deposition of Dr. Saad, class certification reply papers	Class Certification
3/25/2022	Rachel Steyer	0.2	\$750	\$150	call with DMS to discuss and review assistance with draft declarations	Class Certification
3/25/2022	Rachel Steyer	0.7	\$750	\$525	editing and revising OJO draft declaration	Class Certification
3/25/2022	Rachel Steyer	0.2	\$750	\$150	email to OJO summarizing feedback and comments on draft declaration	Class Certification
3/25/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising RDR draft declaration	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/25/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising GSL draft declaration	Class Certification
3/25/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising KGJ draft declaration	Class Certification
3/25/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising combined DMS and RLS draft declaration	Class Certification
3/25/2022	Rachel Steyer	0.2	\$750	\$150	email to DMS with tasks for next week	Class Outreach and Contact
3/25/2022	Rachel Steyer	0.3	\$750	\$225	communications on teams with DMS, RDR, GSL, OJO concerning outreach efforts and questions	Class Outreach and Contact
3/25/2022	Rachel Steyer	0.2	\$750	\$150	email to co-counsel and GBW, MTJ, TCC identifying list of potential deponents	Depositions
3/25/2022	Rachel Steyer	1.0	\$750	\$750	drafting and preparing list of happy camper deponents	Depositions
3/25/2022	Rachel Steyer	0.7	\$750	\$525	reviewing co-counsel depo outline, adding questions	Depositions
3/25/2022	Rachel Steyer	1.4	\$750	\$1,050	reviewing happy camper declarants, reviewing production for relevant documents, updating chart analyzing potential deponents	Discovery (Non-Deposition)
3/25/2022	Travis Close	0.3	\$850	\$255	Review and analyze memo by BMU re: language in management agreements indicating corporate control over facilities	Case Organization, Planning and Strategy
3/25/2022	Travis Close	0.2	\$850	\$170	Review and analyze list of preferential happy campers by RLS	Case Organization, Planning and Strategy
3/25/2022	Travis Close	0.6	\$850	\$510	Legal research re: whether residents with dementia may be competent to testify at deposition	Case Organization, Planning and Strategy
3/25/2022	Travis Close	0.5	\$850	\$425	Review and analyze draft sample of outline for happy camper deposition	Depositions
3/25/2022	Travis Close	1.5	\$850	\$1,275	Analyze evidence of fires/evacuations at Paulin Creek facility from emails produced by Defendants	Discovery (Non-Deposition)
3/25/2022	Travis Close	0.6	\$850	\$510	Draft email to June Kailes re: tasks for reply declaration	Experts (Including Retention)
3/25/2022	Travis Close	2.4	\$850	\$2,040	Prepare updated spreadsheet for JIK analysis of Brookdale's supplemental emergency evacuation forms	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/27/2022	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of Defendants' response re putative class member declarations and status of supplemental initial disclosures; com's with GG; MTJ; RLS re same	Other Motions
3/27/2022	Mark Johnson	0.5	\$1,150	\$575	call w/ GCG re D section of ltr brief on class member depos and response to same	Other Motions
3/27/2022	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW re D section to ltr brief re class member depos and response to same	Other Motions
3/27/2022	Mark Johnson	2.0	\$1,150	\$2,300	research docs in relativity related to class members identified for depositions, declarations from same or any class members.	Other Motions
3/28/2022	Guy Wallace	1.2	\$1,350	\$1,620	revise and edit MTC re depositions of Defendants' putative class member declarants; com's with GG; MTJ re same	Class Certification
3/28/2022	Mark Johnson	1.7	\$1,150	\$1,955	review doc productions in relativity and bates stamped folder for overview and reconcillation, identification of gaps in same, prepare spreadsheet of complete production for case file, com w/ GBW, RAB re same;	Case Organization, Planning and Strategy
3/28/2022	Mark Johnson	0.8	\$1,150	\$920	review doc production in Relativity for docs identifying time spent by clinical staff on laundry; identify resident services summary report samples for J Thornton	Class Certification
3/28/2022	Mark Johnson	0.1	\$1,150	\$115	email to J Thornton re docs w infor re laundry hours and Saad issues	Class Certification
3/28/2022	Mark Johnson	2.8	\$1,150	\$3,220	work on outline for Saad depo, review Saad reports and depo transcripts from other cases	Depositions
3/28/2022	Mark Johnson	0.1	\$1,150	\$115	emails w/ LEC and Titan rep re Anderson doc subpoena	Discovery (Non-Deposition)
3/28/2022	Mark Johnson	0.4	\$1,150	\$460	review and analyze D revisions to jnt ltr brief re communications with class members; review new exhibit / declaration from POA in support of same	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/28/2022	Mark Johnson	0.3	\$1,150	\$345	coms w/ RLS and GBW re ltr brief re communications with resident POA, including call w/ RLS (.2), email from RLS describing history and exchange w/ GBW	Other Motions
3/28/2022	Mark Johnson	1.4	\$1,150	\$1,610	review segments of D document production for evidence of production of declarations for ltr brief re class member depos.	Other Motions
3/28/2022	Mark Johnson	1.8	\$1,150	\$2,070	review and draft edits to P section of ltr brief re class member depos; coms w/ GCG and GBW re same; review and make further additions to revised version.	Other Motions
3/28/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising SLS draft declaration	Class Certification
3/28/2022	Rachel Steyer	0.3	\$750	\$225	call with GBW to review defendants exhibits and citations in opposition brief	Class Certification
3/28/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising GSL draft declaration	Class Certification
3/28/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising OJO draft declaration	Class Certification
3/28/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising DMS draft declaration	Class Certification
3/28/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising KGJ draft declaration	Class Certification
3/28/2022	Rachel Steyer	0.5	\$750	\$375	reviewing OJO draft declaration	Class Certification
3/28/2022	Rachel Steyer	0.2	\$750	\$150	call with DMS to review and discuss allegations in declaration	Class Outreach and Contact
3/28/2022	Rachel Steyer	0.2	\$750	\$150	call with MTJ to review and discuss allegations of contact	Class Outreach and Contact
3/28/2022	Rachel Steyer	0.3	\$750	\$225	email to GBW and MTJ concerning allegation of class outreach contact	Class Outreach and Contact
3/28/2022	Rachel Steyer	0.3	\$750	\$225	call with GBW to discuss allegations of improper contact	Class Outreach and Contact
3/28/2022	Rachel Steyer	0.3	\$750	\$225	communications on teams with GSL, OJO, DMS, KGJ concerning draft declarations, intakes, and outreach questions	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/28/2022	Rachel Steyer	0.6	\$750	\$450	reviewing happy camper declarations for number of POAs and letters	Discovery (Non-Deposition)
3/28/2022	Rachel Steyer	0.2	\$750	\$150	preparing response to co-counsel with individual letter happy camper declarants	Discovery (Non-Deposition)
3/28/2022	Rachel Steyer	0.3	\$750	\$225	reviewing production for relevant documents corresponding to potential declarant	Discovery (Non-Deposition)
3/28/2022	Rachel Steyer	0.7	\$750	\$525	editing and reviewing and finalizing draft supplemental initial disclosures	Discovery (Non-Deposition)
3/28/2022	Travis Close	0.5	\$850	\$425	Review, analyze and revise draft joint letter brief re: extend deposition limit to take absent class member depositions	Communications With Opposing Counsel
3/28/2022	Travis Close	1.5	\$850	\$1,275	Legal research re: whether plaintiffs can obtain additional depositions for absent class members	Depositions
3/28/2022	Travis Close	1.9	\$850	\$1,615	Doug cross -- analysis of implementation of local vs. corporate transportation policies through resident complaints on Issue Registers	Discovery (Non-Deposition)
3/28/2022	Travis Close	1.4	\$850	\$1,190	Continue analyzing Issue Registers produced for complaints from residents about not being able to ride scooter on transportation services	Discovery (Non-Deposition)
3/28/2022	Travis Close	1.2	\$850	\$1,020	Review and analyze complaints about Brookdale's transportation services from the following residents: Roberts Mixon, Melinda Silva, Steve Merciel	Discovery (Non-Deposition)
3/28/2022	Travis Close	0.7	\$850	\$595	Review and analyze complaints regarding transportation services in wheelchair from resident Mary Elliott	Discovery (Non-Deposition)
3/29/2022	Guy Wallace	2.2	\$1,350	\$2,970	review and analysis of Defendants' motion re contacts with putative class members; revise and edit letter brief re same; declaration of Steyer re same; revise and edit declaration of Solano-Florez re same; com's with MTJ; RLS re same	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/29/2022	Mark Johnson	0.5	\$1,150	\$575	call w/ RLS re decs iso P position on mtn re communications w/ class members	Other Motions
3/29/2022	Mark Johnson	0.1	\$1,150	\$115	review and respond to OC email re letter brief on communications w/ class members	Other Motions
3/29/2022	Mark Johnson	5.8	\$1,150	\$6,670	re-write P section of ltr brief re communication w/ class members to address D revisions and additional exhibits, incorporate input from COC	Other Motions
3/29/2022	Mark Johnson	1.6	\$1,150	\$1,840	draft revisions to DMS and RLS declarations for P position on mtn re communications w/ class members.	Other Motions
3/29/2022	Mark Johnson	0.2	\$1,150	\$230	review Defs' and GCG revisions to ltr brief on declarant depositions	Other Motions
3/29/2022	Rachel Steyer	0.3	\$750	\$225	call with DMS to discuss reviewing do not contact lists	Class Outreach and Contact
3/29/2022	Rachel Steyer	0.3	\$750	\$225	email to outreach team (GSL, DMS, OJO, KGJ, SLS) and TRB outlining protocols for reviewing do not contacts	Class Outreach and Contact
3/29/2022	Rachel Steyer	0.2	\$750	\$150	call with OJO to confirm and review updating protocols	Class Outreach and Contact
3/29/2022	Rachel Steyer	2.2	\$750	\$1,650	conducting follow up intake call with responsible party of former resident	Class Outreach and Contact
3/29/2022	Rachel Steyer	0.8	\$750	\$600	finishing intake call with responsible party of former resident	Class Outreach and Contact
3/29/2022	Rachel Steyer	0.3	\$750	\$225	response to GBW and MTJ providing letters and outreach scripts and edits to plaintiffs draft letter brief	Class Outreach and Contact
3/29/2022	Rachel Steyer	0.3	\$750	\$225	communications on temas with TRB, KGJ, OJO, DMS concerning outreach and declaration drafting, outreach protocols	Class Outreach and Contact
3/29/2022	Rachel Steyer	0.9	\$750	\$675	drafting DMS declaration concerning improper contact	Discovery (Non-Deposition)
3/29/2022	Rachel Steyer	1.1	\$750	\$825	drafting RLS declaration	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/29/2022	Rachel Steyer	0.2	\$750	\$150	reviewing and incorporating GBW and MTJ edits into draft DMS declaration	Discovery (Non-Deposition)
3/29/2022	Rachel Steyer	0.2	\$750	\$150	response to GBW and MTJ with question about language in draft DMS declaration	Discovery (Non-Deposition)
3/29/2022	Rachel Steyer	0.2	\$750	\$150	call with DMS to review finalizing declaration	Discovery (Non-Deposition)
3/29/2022	Rachel Steyer	0.5	\$750	\$375	call with MTJ to review and discuss exhibitbts and draft declarations in response to discovery letter brief	Discovery (Non-Deposition)
3/29/2022	Travis Close	1.4	\$850	\$1,190	Create spreadsheet / index of resident complaints based on failure to transport scooter on bus	Discovery (Non-Deposition)
3/29/2022	Travis Close	1.2	\$850	\$1,020	Continue reviewing and analyzing evidence of implementation of Fleet Safety policy at facilities -- search: (wheelchair w/5 transport) - #BKD1625383-BKD1796119 (1-62 of 268)	Discovery (Non-Deposition)
3/29/2022	Travis Close	1.6	\$850	\$1,360	Continue reviewing and analyzing evidence of implementation of Fleet Safety policy at facilities -- search: (wheelchair w/5 transport) - #BKD1625383-BKD1796119 (62-122 of 268)	Discovery (Non-Deposition)
3/29/2022	Travis Close	1.3	\$850	\$1,105	Review and analyze commnents by JIK on Def's motion to exclude her testimony and our opposition to that motion	Experts (Including Retention)
3/29/2022	Travis Close	1.7	\$850	\$1,445	Analyze evidence of accessible transportation provided during 2017/2019 evacuations (Kailes reply Dec)	Experts (Including Retention)
3/30/2022	Guy Wallace	0.9	\$1,350	\$1,215	prepare for and participate in zoom with GG; BBK; AX; KS; EH; BU; MTJ;TCC; RLS re preparation for class cert reply	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/30/2022	Mark Johnson	0.8	\$1,150	\$920	Video conference w/ COC GBW, TCC, RLS, GCG, KS, EH, BBK, AX, BSU - team mtg to discuss tasks for preparing reply brief, decs and exhibits in support of same, expert and resident depositions, discovery motions	Class Certification
3/30/2022	Mark Johnson	1.3	\$1,150	\$1,495	review docs and work on outline for Saad expert depo	Depositions
3/30/2022	Mark Johnson	3.4	\$1,150	\$3,910	final work on P revisions to ltr brief re communications with class members, including additional revisions to ltr,, review and edit RLS and DSM declarations, identify and prepare exhibits; coms w/ RLS re declarations and reconciliation w/ brief, exhibits	Other Motions
3/30/2022	Rachel Steyer	0.9	\$750	\$675	weekly zoom meeting with TCC, GBW, MTJ and co-counsel to discuss ongoing assignments and updates in preparation for reply motion	Case Organization, Planning and Strategy
3/30/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising DMS draft declaration	Class Certification
3/30/2022	Rachel Steyer	0.5	\$750	\$375	call with KGJ to review and discuss how to discuss document provided by declarant concerning emergency evacuations	Class Certification
3/30/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising OJO draft declaration	Class Certification
3/30/2022	Rachel Steyer	0.5	\$750	\$375	editing and revising RDR draft declaration	Class Certification
3/30/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising DMS draft declaration	Class Certification
3/30/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising OJO draft declaration	Class Certification
3/30/2022	Rachel Steyer	0.5	\$750	\$375	editing and revising GSL draft declaration	Class Certification
3/30/2022	Rachel Steyer	0.3	\$750	\$225	reviewing completed intake by OJO	Class Outreach and Contact
3/30/2022	Rachel Steyer	0.5	\$750	\$375	communications on teams with DMS, OJO, KGJ, GSL concerning class outreach efforts, intakes, and declaration drafting	Class Outreach and Contact
3/30/2022	Rachel Steyer	0.2	\$750	\$150	response to MTJ and GBW concerning adding language to draft declaration	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/30/2022	Rachel Steyer	0.2	\$750	\$150	email to GBW and MTJ with question about DMS draft declaration	Discovery (Non-Deposition)
3/30/2022	Rachel Steyer	0.2	\$750	\$150	reviewing plaintiffs' section of joint discovery letter brief concerning class member communications	Discovery (Non-Deposition)
3/30/2022	Rachel Steyer	0.2	\$750	\$150	call with DMS to discuss and review revised language to declaration	Discovery (Non-Deposition)
3/30/2022	Rachel Steyer	0.2	\$750	\$150	email to co-counsel and TCC, GBW, MTJ passing along powerpoint received from declarant discussing and concerning emergency evacuation	Discovery (Non-Deposition)
3/30/2022	Rachel Steyer	0.2	\$750	\$150	reviewing production for relevant documents corresponding to potential declarants	Discovery (Non-Deposition)
3/30/2022	Travis Close	1.3	\$850	\$1,105	Analyze and compare slides received from resident witness on Emergency Evacuation to procedures in Emergency Manual	Case Organization, Planning and Strategy
3/30/2022	Travis Close	0.9	\$850	\$765	Weekly team meeting re: strategy for reply brief; reply decs of schroyer, flores, Kailes and Cross; happy camper depositions; depositions of Ds' experts	Case Organization, Planning and Strategy
3/30/2022	Travis Close	0.3	\$850	\$255	Call with AXU re: summarizing notes from today's meeting and evidence of centralized policies and procedures	Case Organization, Planning and Strategy
3/30/2022	Travis Close	0.2	\$850	\$170	Email to AXU re: evidence of implementation of Fleet Safety Policy for Doug Cross reply dec	Case Organization, Planning and Strategy
3/30/2022	Travis Close	0.2	\$850	\$170	Review and analyze judge's order sealing certain confidential information from class cert motion; denying request to seal other information	Discovery (Non-Deposition)
3/30/2022	Travis Close	0.3	\$850	\$255	Email to RLS, GBW re: emergency evacuation slides presented to residents as compared to procedures in manual	Discovery (Non-Deposition)
3/30/2022	Travis Close	0.5	\$850	\$425	Review and analyze transcript of proceedings form 3/24/22 hearing with judge beeler	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/30/2022	Travis Close	1.4	\$850	\$1,190	Legal research re: whether new evidence of corporate policies may be submitted in reply declarations of experts	Discovery (Non-Deposition)
3/30/2022	Travis Close	1.7	\$850	\$1,445	Investigation of Brookdale violations by california department of social services for failure to maintain proper emergency evacuation plans	Discovery (Non-Deposition)
3/30/2022	Travis Close	0.3	\$850	\$255	Review and analyze draft letter brief re: harassment of class members over telephone	Discovery (Non-Deposition)
3/31/2022	Guy Wallace	0.6	\$1,350	\$810	com's with Marks; MTJ re DES analysis and schedule; analysis of same	Class Certification
3/31/2022	Mark Johnson	0.3	\$1,150	\$345	call w/ GCG re strategy/issues for hearing on mtn to allow additional depositions for class members	Other Motions
4/1/2022	Guy Wallace	0.5	\$1,350	\$675	com's with GG; DTM; MTJ re expert discovery and timeline	Experts (Including Retention)
4/1/2022	Mark Johnson	0.3	\$1,150	\$345	emails w/ DM, JT re Schroyer, Flores reply declarations and addressing points in Saad Declaration	Class Certification
4/1/2022	Mark Johnson	0.4	\$1,150	\$460	review testimony re CCRC facilities and websites re same; email to GCG re same	Class Certification
4/1/2022	Mark Johnson	0.2	\$1,150	\$230	email to Mastin / Waters re reply declarations, updated reports	Class Certification
4/1/2022	Mark Johnson	0.2	\$1,150	\$230	review and edit proposed email to OC re revised redaction request; review COC emails re same	Communications With Opposing Counsel
4/1/2022	Mark Johnson	0.4	\$1,150	\$460	review and analyze revised versions of joint letter briefs on operations plan and Jestrabeck-Hart rogs	Other Motions
4/1/2022	Mark Johnson	0.3	\$1,150	\$345	review Order re class member depositions; review email exchange w/ OC re scheduling, subpoenas and email w/ coc re doc searches for depositions, assessments	Other Motions
4/1/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising GSL draft declaration	Class Certification
4/1/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising DMS draft declaration	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/1/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising SLS draft declaration	Class Certification
4/1/2022	Rachel Steyer	0.2	\$750	\$150	call with OJO to discuss how to handle follow up communications with responsible party of current resident concerning possibility of deposition	Class Outreach and Contact
4/1/2022	Rachel Steyer	0.3	\$750	\$225	reviewing OJO completed intake	Class Outreach and Contact
4/1/2022	Rachel Steyer	0.9	\$750	\$675	communicaitnos on teams with TRB, DMS, GSL, KGJ, SLS, RVR concerning outreach questions, intakes, and declaration drafting	Class Outreach and Contact
4/1/2022	Rachel Steyer	0.8	\$750	\$600	editing and adding to draft depo outline for happy camper declarants	Depositions
4/1/2022	Rachel Steyer	0.5	\$750	\$375	preparing more focused happy camper declarant/deponent spreadsheet identifying relevant documents	Depositions
4/1/2022	Rachel Steyer	0.2	\$750	\$150	email to ESI requests, GBW, TCC, RAB, MTJ regarding request for relativity search	Discovery (Non-Deposition)
4/1/2022	Rachel Steyer	0.5	\$750	\$375	reviewing production for documents corresponding to potential declarants	Discovery (Non-Deposition)
4/1/2022	Rachel Steyer	0.4	\$750	\$300	reviewing production to identify relevant documents corresponding to potential declarants	Discovery (Non-Deposition)
4/1/2022	Travis Close	0.3	\$850	\$255	Review and analyze final draft of joint letter brief re: plaintiffs' contact with class members and brookdale resident witnesses	Case Organization, Planning and Strategy
4/1/2022	Travis Close	0.2	\$850	\$170	Email to JIK re: revising spreadsheet based on notes and sub criteria	Case Organization, Planning and Strategy
4/1/2022	Travis Close	0.2	\$850	\$170	Review and analyze court's order re: happy camper depositions	Depositions
4/1/2022	Travis Close	0.6	\$850	\$510	Call with JIK re: criteria for use in analyzing Brookdale's supplemental evacuation forms	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/1/2022	Travis Close	1.8	\$850	\$1,530	Analyze evidence of implementation of policy that scooters are not allowed during emergency evacuations	Discovery (Non-Deposition)
4/1/2022	Travis Close	0.5	\$850	\$425	Review revised elements list and notes for analyzing supplemental forms drafted by June Kailes	Discovery (Non-Deposition)
4/1/2022	Travis Close	1.4	\$850	\$1,190	Analyze resident lists in 12-month budget reports, showing revenues paid to brookdale senior living, for resident witnesses that plaintiffs intend to depose	Discovery (Non-Deposition)
4/1/2022	Travis Close	0.7	\$850	\$595	Meet with SLG re: strategy for expert declarations submitted for reply brief	Experts (Including Retention)
4/1/2022	Travis Close	0.8	\$850	\$680	Review and analyze comments by JIK on Def's opposition to Ps' motion for class cert	Experts (Including Retention)
4/3/2022	Guy Wallace	2.6	\$1,350	\$3,510	preparation of arguments for class certification reply; Defendants' arguments re Article III standing and injury; legal research and analysis re same	Class Certification
4/3/2022	Guy Wallace	3.3	\$1,350	\$4,455	preparation of arguments for reply on class certification; legal research and analysis re Defendants arguments re benefit of the bargain (contractual theory of Plaintiffs' claims); lack of Article III injury; alleged insufficient request for reasonable accommodation	Class Certification
4/3/2022	Guy Wallace	1.6	\$1,350	\$2,160	preparation of arguments for class cert reply; issues re centralized decision making; "discretion" of facilities; Defendants' attempts to misstate or mischaracterize our legal theories	Class Certification
4/3/2022	Mark Johnson	0.8	\$1,150	\$920	review cases cited by D in support of limiting interrogatories to 25 per side.	Other Motions
4/3/2022	Mark Johnson	0.8	\$1,150	\$920	review D revised versions of 3 joint letter briefs on class member communications, operations plans and J-H rogs	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/3/2022	Mark Johnson	0.4	\$1,150	\$460	emails w/ COC re strategy and issues pertaining to 3 joint letter briefs on class member communications, J-H rogs and operations plans	Other Motions
4/4/2022	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of Saad Declaration; com's with MTJ re same (.2)	Class Certification
4/4/2022	Guy Wallace	1.7	\$1,350	\$2,295	com's with DTM; JT; MTJ re preparation for Saad deposition; preparation of reply declaration of Schroyer re class certification	Class Certification
4/4/2022	Guy Wallace	1.4	\$1,350	\$1,890	legal research and analysis re minor variations in how corporate policies and procedures are implemented in local facilities	Class Certification
4/4/2022	Guy Wallace	0.2	\$1,350	\$270	com's with Waters re preparation of reply declaration re class certification	Class Certification
4/4/2022	Guy Wallace	0.9	\$1,350	\$1,215	legal research and analysis re weight given to putative class member declarations proffered in opposition to class certification	Class Certification
4/4/2022	Guy Wallace	1.2	\$1,350	\$1,620	legal research and analysis re Defendants' arguments re allegedly uninjured class members	Class Certification
4/4/2022	Guy Wallace	0.2	\$1,350	\$270	com's with MTJ re motions to compel re interrogatories; plans of operation	Discovery (Non-Deposition)
4/4/2022	Mark Johnson	1.6	\$1,150	\$1,840	conference call w/ GBW, JT, DM re jacobsen and Saad depos, analysis of data	Class Certification
4/4/2022	Mark Johnson	1.0	\$1,150	\$1,150	additional review of Saad declaration and calls w/ GBW re same in prep for call with Marks and Thornton	Class Certification
4/4/2022	Mark Johnson	4.8	\$1,150	\$5,520	revise jnt letter brief iso J-H rogs set one, including additional legal research, drafting, coms w/ GBW re same	Other Motions
4/4/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising OJO draft declaration	Class Certification
4/4/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising DMS draft declaration	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/4/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising KGJ draft declaration	Class Certification
4/4/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising OJO draft declaration	Class Certification
4/4/2022	Rachel Steyer	0.7	\$750	\$525	communications on teams with DMS, RVR, RDR, KGJ, SLS, OJO checking in about status of outreach and declaration drafting efforts	Class Outreach and Contact
4/4/2022	Rachel Steyer	1.0	\$750	\$750	conducting research into discovery letter brief concerning violations of protective order communications with putative class member	Discovery (Non-Deposition)
4/4/2022	Travis Close	0.8	\$850	\$680	Review and analyze articles on Brookdale's "operational improvements" for admissions re: centralized control	Case Organization, Planning and Strategy
4/4/2022	Travis Close	0.3	\$850	\$255	Email to GCG (co-counsel) re Brookdale's communications about its staffing program to investors	Case Organization, Planning and Strategy
4/4/2022	Travis Close	1.3	\$850	\$1,105	Legal research re whether transportation providers are allowed to refuse access to electric scooters based on insurance policies	Case Organization, Planning and Strategy
4/4/2022	Travis Close	1.4	\$850	\$1,190	Search for centralized evidence of wheelchair securement trainings, such as course name FLT2000 (Q'Straint Systems Training)	Discovery (Non-Deposition)
4/4/2022	Travis Close	1.7	\$850	\$1,445	June Kailes -- emergency evacuation -- revise spreadsheet for supplemental analysis to incorporate sub-elements and dates	Experts (Including Retention)
4/4/2022	Travis Close	0.2	\$850	\$170	Email to June Kailes re: revised spreadsheet for supplemental emergency plan analysis	Experts (Including Retention)
4/4/2022	Travis Close	0.2	\$850	\$170	Email to June Kailes re: further discussion about supplemental plan analysis	Experts (Including Retention)
4/4/2022	Travis Close	2.2	\$850	\$1,870	Analyze & organize materials for Doug Cross reply brief (Motion to exclude + exhibits, opposition to Motion to exclude + exhibits, def's Opposition + relevant exhibits)	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/4/2022	Travis Close	0.8	\$850	\$680	Call back from Doug Cross re: scope of work for reply declarations	Experts (Including Retention)
4/5/2022	Guy Wallace	4.1	\$1,350	\$5,535	review and analysis of Defendants' "happy camper" declarations; preparation of topics and questions re same for deposition	Class Certification
4/5/2022	Mark Johnson	0.5	\$1,150	\$575	review outline of questions for class member depositions; com w/ GBW re same and email COC with additional questions	Depositions
4/5/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising GSL draft declaration	Class Certification
4/5/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising GSL draft declaration	Class Certification
4/5/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising GSL draft declaration	Class Certification
4/5/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising GSL draft declaration	Class Certification
4/5/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising GSL draft declaration	Class Certification
4/5/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising RDR draft declaration	Class Certification
4/5/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising OJO draft declaration	Class Certification
4/5/2022	Rachel Steyer	0.5	\$750	\$375	received call back from current resident, discussed case, interested in completing intake	Class Outreach and Contact
4/5/2022	Rachel Steyer	0.5	\$750	\$375	follow up call with potential declarant for OJO, had questions about declaration	Class Outreach and Contact
4/5/2022	Rachel Steyer	0.5	\$750	\$375	received call back from family member of former resident, discussed case, interested in follow up	Class Outreach and Contact
4/5/2022	Rachel Steyer	0.3	\$750	\$225	reviewing OJO completed intake	Class Outreach and Contact
4/5/2022	Rachel Steyer	0.2	\$750	\$150	communications with OJO, DMS, KGJ on teams concerning intakes and declarations	Class Outreach and Contact
4/5/2022	Rachel Steyer	0.4	\$750	\$300	response to MTJ, GBW, TCC and co-counsel providing dates of when each potential deponent signed their declarations as requested by MTJ	Depositions
4/5/2022	Rachel Steyer	0.7	\$750	\$525	meeting with co-counsel to discuss and review depo schedule and calendar dates	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/5/2022	Rachel Steyer	0.4	\$750	\$300	editing and updating depo prep outline for potential deponent	Depositions
4/5/2022	Travis Close	0.9	\$850	\$765	Compile, review and analyze declarations for absent class members from def's opposiiton who claim to be able to ride on transit while on scooters and powerchairs	Case Organization, Planning and Strategy
4/5/2022	Travis Close	1.2	\$850	\$1,020	Call with June Kailes re: questions about motion to exclude her testimony, our opposition, and her analysis of the supplemenetal emergency evacuation forms	Case Organization, Planning and Strategy
4/5/2022	Travis Close	0.8	\$850	\$680	Legal research re: inherent conflicts with absent class members testifying in support of defendants	Depositions
4/5/2022	Travis Close	0.3	\$850	\$255	Review and analyze revised remplate for happy camper depositions	Depositions
4/5/2022	Travis Close	1.6	\$850	\$1,360	Relativity search for Brookdale's absent class member declarants who claim to not have been required to transfer from electric scooter on bus/van (John Beaty, Patricia Carns, Rubye Crabtree, Betty Macomber, Ann Wahl, Bennie Williams, Gloria Zimmer)	Discovery (Non-Deposition)
4/5/2022	Travis Close	1.3	\$850	\$1,105	Review and analyze residency agreements and personal service assessments for Brookdale declarants who claim to have not experienced issues with electric scooters	Discovery (Non-Deposition)
4/5/2022	Travis Close	1.1	\$850	\$935	Review and analyze emails showing issues with wheelchair transport (wheelchairs w/5 transport) -- # BKD2022463-BKD2289761 (122-199 of 268)	Discovery (Non-Deposition)
4/5/2022	Travis Close	1.2	\$850	\$1,020	Review and analyze emails showing issues with wheelchair transport (wheelchairs w/5 transport) -- # BKD2289761-BKD2929592 (199-268 of 268)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/6/2022	Guy Wallace	1.3	\$1,350	\$1,755	preparation of list of Ninth Circuit authorities rebutting Defendants' main opposition arguments to class certification	Class Certification
4/6/2022	Guy Wallace	1.7	\$1,350	\$2,295	revise and edit draft declarations of putative class members; com's with RLS re same (.4)	Class Certification
4/6/2022	Guy Wallace	0.9	\$1,350	\$1,215	prepare for and participate in zoom with GG; JY; BBK; AX; KS; EH; BU; MTJ; TCC; RLS re preparation of reply papers in support of class certification	Class Certification
4/6/2022	Guy Wallace	3.9	\$1,350	\$5,265	preparation of topics and questions for Anderson depo	Depositions
4/6/2022	Mark Johnson	0.9	\$1,150	\$1,035	team mtg re class depos, expert depos, filing re new redactions requested by Ps, class member declarations, pending discovery ltr briefs, tasks for preparing reply papers	Case Organization, Planning and Strategy
4/6/2022	Mark Johnson	0.8	\$1,150	\$920	ID and send docs to GBW for Anderson depo, including links to sites and presentations, com w/ GBW re same	Depositions
4/6/2022	Mark Johnson	5.5	\$1,150	\$6,325	work on Saad depo outline and review docs for same	Depositions
4/6/2022	Mark Johnson	1.8	\$1,150	\$2,070	revise ltr brief to bring within page limitations, email com w/ OC re same.	Other Motions
4/6/2022	Mark Johnson	0.4	\$1,150	\$460	calls x2 w/ GCG re deadline for filing class cert papers with revised redactions per order, stip w OC re same, strategy of filling over-redacted version to accommodate D interests.	Other Motions
4/6/2022	Mark Johnson	0.7	\$1,150	\$805	review and edit GCG declaration iso filing of overredacted class cert papers based on stipulation, review stip and correspondence from COC re same	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/6/2022	Rachel Steyer	0.8	\$750	\$600	weekly meeting with TCC, GBW, MTJ and co-counsel to review items and assignments in preparation for reply motion	Case Organization, Planning and Strategy
4/6/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising DMS draft declaration	Class Certification
4/6/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising OJO draft declaration	Class Certification
4/6/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising GSL draft declarations	Class Certification
4/6/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising KGJ draft declaration	Class Certification
4/6/2022	Rachel Steyer	0.2	\$750	\$150	question to GBW and MTJ concerning POA documentation and declarations	Class Certification
4/6/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising OJO draft declaration	Class Certification
4/6/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising GSL draft declaration	Class Certification
4/6/2022	Rachel Steyer	0.3	\$750	\$225	sending GBW and MTJ additional declarations for review, discussing renaming of documents	Class Certification
4/6/2022	Rachel Steyer	0.2	\$750	\$150	email to outreach team and TRB requesting review of status of current residents as declarants who may have POAs	Class Outreach and Contact
4/6/2022	Rachel Steyer	0.2	\$750	\$150	updating depo prep outline	Depositions
4/6/2022	Travis Close	0.9	\$850	\$765	team meeting re: happy camper depositions, reply declarations of GBW, june kailes, doug cross; sealing, etc.	Case Organization, Planning and Strategy
4/6/2022	Travis Close	0.8	\$850	\$680	Review and analyze evidence of transportation standards concerning accessible transportation/Fleet Safety Policy in Brookdale BEST audits	Case Organization, Planning and Strategy
4/6/2022	Travis Close	0.2	\$850	\$170	Email to GBW re: Anderson deposition prep	Depositions
4/6/2022	Travis Close	1.3	\$850	\$1,105	Depo prep - Continue creating iindex for Doug Anderson production (response to subpoena, presentations, seyfarth letter of 30-10-2022)	Depositions
4/6/2022	Travis Close	0.5	\$850	\$425	Email to GBW summarizing deficiencies found in Anderson expert production	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/6/2022	Travis Close	1.2	\$850	\$1,020	Review and analysis of evidence of implementation of Fleet Safety Policy - Q'Straint systems - # BKD0107250-BKD1896684 (1-199 of 812)	Discovery (Non-Deposition)
4/6/2022	Travis Close	2.1	\$850	\$1,785	Depo prep - create Index of Anderson productions on 3/10/22	Experts (Including Retention)
4/7/2022	Guy Wallace	3.4	\$1,350	\$4,590	revise and edit draft reply declarations of putative class members; com's with RLS; MTJ; BU re same	Class Certification
4/7/2022	Mark Johnson	0.2	\$1,150	\$230	review phv application for Kristen Bennet, review bio on website and email COC re same and re her prior involvement in training emails	Case Organization, Planning and Strategy
4/7/2022	Mark Johnson	1.5	\$1,150	\$1,725	review 3 class member declarations and suggest edits, pose/ answer questions.	Class Certification
4/7/2022	Mark Johnson	0.3	\$1,150	\$345	calls x2 w/ GBW re expert depos, class member declarations	Class Certification
4/7/2022	Mark Johnson	1.4	\$1,150	\$1,610	review and edit and comment on additional resident declartions	Class Certification
4/7/2022	Mark Johnson	1.2	\$1,150	\$1,380	review additional batch of resident declarations and edit, comment on same; emails w/ RLS	Class Certification
4/7/2022	Mark Johnson	0.5	\$1,150	\$575	email conversation w/ COC BBK, JY, AX, RLS, GBW re complaint system identified by resident declarant, depo testimony re same, spreadsheet (issue register) recording information and use of docs in support of corporate control argument	Class Certification
4/7/2022	Mark Johnson	1.2	\$1,150	\$1,380	draft depo notices for Anderson, Jacobson and Saad, draft email to COC re same and scheduling	Depositions
4/7/2022	Mark Johnson	0.4	\$1,150	\$460	review list of docs produced by Ds for Saad expert disclosure and draft email to Marks/Thornton re same and re remote participation in depo	Depositions
4/7/2022	Mark Johnson	1.5	\$1,150	\$1,725	work on depo outline and prep for Saad depo	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/7/2022	Mark Johnson	0.3	\$1,150	\$345	email exchanges w/ KS at RBGG re aggregated barrier list from expert reports; review sample spreadsheet of sorted barrier list	Experts (Including Retention)
4/7/2022	Rachel Steyer	0.3	\$750	\$225	call with KGJ to discuss read through process	Class Certification
4/7/2022	Rachel Steyer	0.5	\$750	\$375	call with RDR to review and discuss pending questions about draft declaration	Class Certification
4/7/2022	Rachel Steyer	0.2	\$750	\$150	reviewing correspondence from co-counsel describing 30b6 testimony concerning family and resident complaint hotline	Class Certification
4/7/2022	Rachel Steyer	0.2	\$750	\$150	response to co-counsel and GBW and MTJ concerning pursuing declarants absent their POAs	Class Certification
4/7/2022	Rachel Steyer	0.4	\$750	\$300	responding to GBW question regarding number of facilities covered by declarations, updating chart	Class Certification
4/7/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising GSL draft declaration	Class Certification
4/7/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising GSL draft declaration	Class Certification
4/7/2022	Rachel Steyer	0.6	\$750	\$450	reviewing and incorporating GBW and MTJ edits in draft declarations	Class Certification
4/7/2022	Rachel Steyer	0.6	\$750	\$450	call with GSL to review and discuss questions about draft declaration and communications with other class members	Class Outreach and Contact
4/7/2022	Rachel Steyer	0.4	\$750	\$300	communications on teams with DMS, KGJ, GSL, SLS concerning outreach and declaration drafting	Class Outreach and Contact
4/7/2022	Rachel Steyer	1.4	\$750	\$1,050	depo prep meeting with co-counsel to review and discuss revised outline, practice session	Depositions
4/7/2022	Rachel Steyer	0.2	\$750	\$150	reviewing revised happy camper depo outline	Depositions
4/7/2022	Travis Close	0.2	\$850	\$170	Email to ESI Requests re: depo summaries needed for mentions of Brookdale's BEST auditing system	Case Organization, Planning and Strategy
4/7/2022	Travis Close	1.7	\$850	\$1,445	Review and analyze evidence that emergency manual is mandatory policy that applies to all facilities	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/7/2022	Travis Close	0.6	\$850	\$510	Review, analyze and compile evidence for co-counsel that the Emergency Manual is available on BSL.net	Case Organization, Planning and Strategy
4/7/2022	Travis Close	1.6	\$850	\$1,360	Review and analyze evidence of Brookdale associate training / course completion for Brookdale's accessible transportation policies, including the Fleet Safety Policy	Discovery (Non-Deposition)
4/7/2022	Travis Close	1.4	\$850	\$1,190	Further review and analysis of evidence of implementation of the Fleet Safety Policy at individual facilities - # BKD0002801-BKD1798173 (1-82 of 936)	Discovery (Non-Deposition)
4/7/2022	Travis Close	0.8	\$850	\$680	Depo prep - Anderson - analyze contention that Brookdale facilities are responsible for their own asset management with searches of Asset Management custodian	Discovery (Non-Deposition)
4/7/2022	Travis Close	0.2	\$850	\$170	Email to RLS re: how to determine whether facilities are still operated by Brookdale	Discovery (Non-Deposition)
4/8/2022	Guy Wallace	1.2	\$1,350	\$1,620	revise and edit draft reply declarations of putative class members	Class Certification
4/8/2022	Guy Wallace	0.6	\$1,350	\$810	com's with Marks; JT; MTJ re Saad declaration; deposition	Class Certification
4/8/2022	Guy Wallace	0.5	\$1,350	\$675	com's with BU re draft reply declarations of putative class members; preparation of reply declarations of Dr. Flores and Dale Schroyer	Class Certification
4/8/2022	Guy Wallace	2.8	\$1,350	\$3,780	review and analysis of Anderson declaration; preparation for deposition of Anderson	Depositions
4/8/2022	Guy Wallace	3.6	\$1,350	\$4,860	review and analysis of Saad declaration; com's with MTJ re same (.7)	Experts (Including Retention)
4/8/2022	Guy Wallace	0.9	\$1,350	\$1,215	com's with Waters; Mastin; MTJ re Anderson Declaration and facility reports	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/8/2022	Mark Johnson	1.4	\$1,150	\$1,610	video conference call with Mastin and Waters and TCC & GBW re reply declarations, Anderson declaration, revisions to site reports.	Class Certification
4/8/2022	Mark Johnson	0.5	\$1,150	\$575	video call w/ GBW, Thornton, Marks re prep for Jacobsen and Saad depos, data analysis	Class Certification
4/8/2022	Mark Johnson	0.7	\$1,150	\$805	review Olean decision from Ninth Circuit on class cert burden of proof, expert testimony, admissibility of evidence and diminimus rule re uninjured class members	Class Certification
4/8/2022	Mark Johnson	0.7	\$1,150	\$805	review and edit/comment on additional resident declarations and coms w/ RLS re same	Class Certification
4/8/2022	Mark Johnson	0.6	\$1,150	\$690	call w/ GBW and then adding Jenny and Gay re proper respone and strategy for resident declarants unwilling to appear for their dpos	Depositions
4/8/2022	Mark Johnson	0.6	\$1,150	\$690	call w/ GBW re analysis of Saad declaration, questions for depo	Depositions
4/8/2022	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW re Anderson materials for depo	Depositions
4/8/2022	Mark Johnson	0.7	\$1,150	\$805	prep for call w/ Thornton, Marks re Jacobson and Saad depos, data.	Depositions
4/8/2022	Mark Johnson	0.2	\$1,150	\$230	coms w/ staff re prep of depo notices, scheduling depos, review of depo notices for Anderson and Jacobson	Depositions
4/8/2022	Mark Johnson	0.2	\$1,150	\$230	review and respond to email re Saad depo and dispute re in person v remote, meet and confer re documents.	Depositions
4/8/2022	Mark Johnson	2.0	\$1,150	\$2,300	continue prep for Saad depo, including revisions to outline.	Depositions
4/8/2022	Mark Johnson	0.1	\$1,150	\$115	call w/ RLs re exhibits to joint ltr brief re class member communications	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/8/2022	Mark Johnson	0.5	\$1,150	\$575	review email and revised version of joint ltr brief re resident communications from Ds' counsel; compare draftts, review exhibits	Other Motions
4/8/2022	Mark Johnson	0.3	\$1,150	\$345	email to OC re draft ltr brief re resident communications, failure to ID changes, com w/ COC re same.	Other Motions
4/8/2022	Rachel Steyer	0.5	\$750	\$375	reviewing and incorporating MTJ and GBW edits and comments into draft declarations, updating notes in sharepoint, forwarding drafts to outreach attorneys	Class Certification
4/8/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising OJO draft declaration	Class Certification
4/8/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising DMS draft declaration	Class Certification
4/8/2022	Rachel Steyer	0.3	\$750	\$225	call with KGJ to review and discuss read through and other questions surroundning finalizing declarations	Class Certification
4/8/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising OJO draft declaration	Class Certification
4/8/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising RDR draft declaration	Class Certification
4/8/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising DMS draft declaration	Class Certification
4/8/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising DMS draft declaration	Class Certification
4/8/2022	Rachel Steyer	0.2	\$750	\$150	editing and responding to GSL draft email to potential declarant	Class Outreach and Contact
4/8/2022	Rachel Steyer	1.0	\$750	\$750	received call back from responsible party of current resident, discussed case and her father's situation, set up next steps for intake and further follow up	Class Outreach and Contact
4/8/2022	Rachel Steyer	0.2	\$750	\$150	email to DMS describing call with family member of current resident, follow up for intake	Class Outreach and Contact
4/8/2022	Rachel Steyer	0.4	\$750	\$300	communications on teams with KGJ, SLS, GSL, RDR, OJO concerning class outreach and declaration drafting efforts	Class Outreach and Contact
4/8/2022	Rachel Steyer	0.3	\$750	\$225	reviewing case circulated by co-counsel as part of depo prep re sanctionable conduct	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/8/2022	Rachel Steyer	0.2	\$750	\$150	reviewing production for documents corresponding to declarants	Discovery (Non-Deposition)
4/8/2022	Travis Close	0.9	\$850	\$765	Review and analyze decision in ninth circuit affirming statistical model used in antitrust class action	Appeal
4/8/2022	Travis Close	0.5	\$850	\$425	Prep for call with MTJ, GBW, and architectural experts - review and analyze dec of Anderson for opinions, and docs submitted for expert production	- Case Organization, Planning and Strategy
4/8/2022	Travis Close	0.3	\$850	\$255	Review and analyze POA for daughter of Gloria Zimmer (happy camper declarant)	Discovery (Non-Deposition)
4/8/2022	Travis Close	1.3	\$850	\$1,105	Further review and analysis of evidence of implementation of the Fleet Safety Policy at individual facilities - # BKD1798173-BKD1896763 (82-123 of 936)	Discovery (Non-Deposition)
4/8/2022	Travis Close	1.4	\$850	\$1,190	Further review and analysis of evidence of implementation of the Fleet Safety Policy at individual facilities - # BKD1995876-BKD1995876 (123-164 of 936)	Discovery (Non-Deposition)
4/8/2022	Travis Close	0.8	\$850	\$680	Continue drafting index evidencing implementation of Brookdale's Fleet Safety Policy	Discovery (Non-Deposition)
4/8/2022	Travis Close	0.4	\$850	\$340	Review and analyze Ps' Opposition to Ds' application for ex parte motion to stay case & dec of Chris Healey & exhibits	Pleadings and Motions Re: Pleadings
4/8/2022	Travis Close	1.4	\$850	\$1,190	Call with GBW, MTJ, and architectural experts re: reply briefs, Anderson depo	Pleadings and Motions Re: Pleadings
4/9/2022	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW re evidence iso class cert on staffing analysis, benchmarks, task times.	Class Certification
4/9/2022	Mark Johnson	3.5	\$1,150	\$4,025	continue prep for Saad depo: work on outline and review docs	Depositions
4/10/2022	Guy Wallace	5.6	\$1,350	\$7,560	preparation of outline of class cert reply brief	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/10/2022	Guy Wallace	0.6	\$1,350	\$810	preparation of topics and questions for Anderson depo	Depositions
4/10/2022	Mark Johnson	6.0	\$1,150	\$6,900	continue prep for Saad depo	Depositions
4/10/2022	Mark Johnson	0.2	\$1,150	\$230	review email from OC Maatman re availability of resident declarants for depo and availability of facilities; draft email to COC re proposed response and action based on same.	Depositions
4/11/2022	Guy Wallace	0.7	\$1,350	\$945	preparation of checklist re editing draft reply declarations of putative class members and other witnesses; com's with BU; MTJ; RLS re same	Class Certification
4/11/2022	Guy Wallace	0.6	\$1,350	\$810	review and analysis of Ninth Circuit en banc decision in Olean re class certification requirements	Class Certification
4/11/2022	Guy Wallace	3.4	\$1,350	\$4,590	preparation of topics, questions and exhibits for Anderson depo	Depositions
4/11/2022	Guy Wallace	1.4	\$1,350	\$1,890	review and analysis of Saad and Anderson declarations; com's with MTJ re same and topics for deposition	Depositions
4/11/2022	Guy Wallace	0.6	\$1,350	\$810	com's with RLS re results of deposition of putative class member who submitted declaration in opposition to class certification; preparation re further similar depositions	Depositions
4/11/2022	Guy Wallace	1.3	\$1,350	\$1,755	review and analysis of Anderson presentations	Experts (Including Retention)
4/11/2022	Mark Johnson	0.6	\$1,150	\$690	telephonic meet and confer with Jacobsen, Riley re documents for Saad depo, appearance in person.	Depositions
4/11/2022	Mark Johnson	1.3	\$1,150	\$1,495	call w/ GBW re Saad depo, review and discuss Saad declaration and exhibits and analysis of data from Thornton	Depositions
4/11/2022	Mark Johnson	2.1	\$1,150	\$2,415	video conference call w/ Thornton, close re Saad data, questions for depo, data underlying exhibits	Depositions
4/11/2022	Mark Johnson	0.6	\$1,150	\$690	call w S Stiner re corrections to volume 1 of depo	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/11/2022	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW re meet and confer w/ oc re depo of Saad, strategy for addressing stand-off re in-person v. remote depo	Depositions
4/11/2022	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW re issues for Saad depo; Thornton analysis of graphs and data	Depositions
4/11/2022	Mark Johnson	0.3	\$1,150	\$345	draft follow up correspondence to OC re Saad depo - parties' position and possible solution	Depositions
4/11/2022	Mark Johnson	2.5	\$1,150	\$2,875	continue working on outline for Saad depo and reviewing materials	Depositions
4/11/2022	Rachel Steyer	0.8	\$750	\$600	call with GBW to discuss and review depo prep, declarations, outstanding reminders and assignments	Case Organization, Planning and Strategy
4/11/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising OJO draft declaration	Class Certification
4/11/2022	Rachel Steyer	0.2	\$750	\$150	reviewing DMS additions to draft declaration following read through call	Class Certification
4/11/2022	Rachel Steyer	0.3	\$750	\$225	re-reviewing production for declarant records and documents to try to verify information in draft declaration	Class Certification
4/11/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising RDR draft declaration	Class Certification
4/11/2022	Rachel Steyer	0.2	\$750	\$150	communications on teams with outreach team to remind them of protocols for finalizing delcarations	Class Outreach and Contact
4/11/2022	Rachel Steyer	0.2	\$750	\$150	email to GBW, MTJ, and co-counsel summarizing deposition	Depositions
4/11/2022	Rachel Steyer	0.2	\$750	\$150	response to GBW providing schedule of happy camper depos	Depositions
4/11/2022	Rachel Steyer	0.6	\$750	\$450	reviewing depo outline and documents corresponding to deponent	Depositions
4/11/2022	Travis Close	0.2	\$850	\$170	email to MTJ re: plans for this friday's deposition of Saad	Case Organization, Planning and Strategy
4/11/2022	Travis Close	0.6	\$850	\$510	M/C with MTJ and defendants re: documents and location for Dr. Saad's deposition	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/11/2022	Travis Close	1.2	\$850	\$1,020	Review and analysis of Kennedy Declaration (Ali Saad depo prep)	Depositions
4/11/2022	Travis Close	1.7	\$850	\$1,445	Call with James Thornton and MTJ re: flaws in Dr Saad's analysis	Depositions
4/11/2022	Travis Close	0.2	\$850	\$170	Review and analyze summary of depo of B. Williams	Depositions
4/11/2022	Travis Close	1.7	\$850	\$1,445	Create chart of Dr Ali Saad cites for analysis of accuracy	Experts (Including Retention)
4/11/2022	Travis Close	1.8	\$850	\$1,530	Analyzes prior cases in which Dr Saad provided expert testimony	Experts (Including Retention)
4/12/2022	Guy Wallace	4.1	\$1,350	\$5,535	preparation of topics and questions for Anderson depo	Depositions
4/12/2022	Guy Wallace	5.2	\$1,350	\$7,020	review and analysis of expert materials re Doug Anderson; com's with Waters and Mastin re same (.5)	Experts (Including Retention)
4/12/2022	Mark Johnson	0.3	\$1,150	\$345	call w/ J Thornton re new findings on Saad data and graphs in prep for deposition	Depositions
4/12/2022	Mark Johnson	0.5	\$1,150	\$575	calls and emails w/ court reporter re Saad depo	Depositions
4/12/2022	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re timing of Saad and Anderson depositions	Depositions
4/12/2022	Mark Johnson	0.8	\$1,150	\$920	calls (x4) w/ GBW re issues and strategy for Anderson and Saad depositions	Depositions
4/12/2022	Mark Johnson	0.2	\$1,150	\$230	review and draft response to GM email re Saad depo	Depositions
4/12/2022	Mark Johnson	7.5	\$1,150	\$8,625	continue prep for Saad depo, including review of docs and addition to outline	Depositions
4/12/2022	Mark Johnson	0.3	\$1,150	\$345	conference w/ TCC re prep for Saad depo	Depositions
4/12/2022	Mark Johnson	0.2	\$1,150	\$230	conferences w/ BR re exhibits for Saad depo	Depositions
4/12/2022	Mark Johnson	0.2	\$1,150	\$230	review decision from Judge Beeler re class member communications and calls and emails w/ COC re same.	Other Motions
4/12/2022	Rachel Steyer	0.7	\$750	\$525	call with KGJ to review and discuss finalizing declarations and changes following read throughs	Class Certification
4/12/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising GSL draft declaration	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/12/2022	Rachel Steyer	0.2	\$750	\$150	email to GBW, MTJ and co-counsel concerning using additional exhibits in deposition	Depositions
4/12/2022	Rachel Steyer	1.5	\$750	\$1,125	prepared for deposition, continued review of outline, attended before deponent failed to appear	Depositions
4/12/2022	Travis Close	1.5	\$850	\$1,275	Revisions to supplemental form analysis & legend based on revised criteria by June Kailes	Case Organization, Planning and Strategy
4/12/2022	Travis Close	0.3	\$850	\$255	Review and analyze Rosales v. El Rancho Farms case shared by co-counsel showing effect of contradictory class member declarations on class cert	Case Organization, Planning and Strategy
4/12/2022	Travis Close	0.6	\$850	\$510	Research and analyze average length of stay at Brookdale facilities based on Brookdale's documents	Case Organization, Planning and Strategy
4/12/2022	Travis Close	0.6	\$850	\$510	Review and analyze Daubert opposition motion for Kennedy as to how his damage model is articulated therein	Case Organization, Planning and Strategy
4/12/2022	Travis Close	0.4	\$850	\$340	Meet with MTJ re: planning for Friday's depo and analysis of Saad declaration citations	Depositions
4/12/2022	Travis Close	0.2	\$850	\$170	Email relevant Anderson docs to GBW (notes on facility inspections)	Depositions
4/12/2022	Travis Close	1.5	\$850	\$1,275	Saad depo prep -- Review and analyze Flores and Schroyer declarations as referenced in Saad declaration	Depositions
4/12/2022	Travis Close	1.7	\$850	\$1,445	Analyze accuracy of citations in Dr. Saad's declaration to testimony from Kennedy declaration and Kennedy depo	Depositions
4/12/2022	Travis Close	0.2	\$850	\$170	Email to JIK re: revisions to criteria for supplemental plan analysis	Discovery (Non-Deposition)
4/13/2022	Guy Wallace	5.8	\$1,350	\$7,830	preparation of topics and questions for Anderson depo	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/13/2022	Guy Wallace	3.1	\$1,350	\$4,185	further preparation of Anderson depo outline; review and analysis of Anderson Declaration; questions from Jeff Mastin	Depositions
4/13/2022	Guy Wallace	0.7	\$1,350	\$945	com's with Waters re preparation for Anderson depo	Experts (Including Retention)
4/13/2022	Guy Wallace	0.8	\$1,350	\$1,080	prepare for and participate in tc with Kennedy; MTJ; TCC re Saad deposition	Experts (Including Retention)
4/13/2022	Mark Johnson	0.9	\$1,150	\$1,035	call w/ GBW, TCC, Patrick Kennedy re Saad depo and issues related to damages analysis	Depositions
4/13/2022	Mark Johnson	1.0	\$1,150	\$1,150	draft issue memo for call w/ Expert P Kennedy for call related to damages analysis for Saad depo	Depositions
4/13/2022	Mark Johnson	1.5	\$1,150	\$1,725	mtgs x3 w/ TCC re depo prep for Saad, logistics, results of analysis of Saad citations to record, issues related to Saad criticism of Kennedy damages model and variation.	Depositions
4/13/2022	Mark Johnson	0.8	\$1,150	\$920	coms w/ TS, reporting agencies, OC re deposition logistics including schedule, changes in same, invitations, tech issues, delivery of exhibits, transportation	Depositions
4/13/2022	Mark Johnson	7.0	\$1,150	\$8,050	continue prep for Saad depo	Depositions
4/13/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising DMS draft declaration	Class Certification
4/13/2022	Rachel Steyer	0.2	\$750	\$150	reviewing and editing DMS draft declaration	Class Certification
4/13/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising OJO draft declaration	Class Certification
4/13/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising GSL draft declaration	Class Certification
4/13/2022	Rachel Steyer	0.2	\$750	\$150	call with DMS to discuss and review questions for draft declaration	Class Certification
4/13/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising DMS draft declaration	Class Certification
4/13/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising GSL draft declaration	Class Certification
4/13/2022	Rachel Steyer	0.4	\$750	\$300	communications on teams with TRB, DMS, GSL, KGJ, OJO, SLS, ANH concerning outreach efforts and confirming depo details	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/13/2022	Rachel Steyer	0.2	\$750	\$150	email to GBW with questions about exhibits	Depositions
4/13/2022	Rachel Steyer	0.2	\$750	\$150	response to co-counsel regarding scheduling of happy camper depositions	Depositions
4/13/2022	Rachel Steyer	0.6	\$750	\$450	reviewing production to identify documents corresponding to likely declarants	Discovery (Non-Deposition)
4/13/2022	Travis Close	0.5	\$850	\$425	Meet with MTJ re: responding to Ali Saad's arguments in his declaration and prepping for depo	Case Organization, Planning and Strategy
4/13/2022	Travis Close	1.3	\$850	\$1,105	Depo prep -- continue analyzing cites in Ali Saad declaration for accuracy (#s 55-68)	Depositions
4/13/2022	Travis Close	0.9	\$850	\$765	Call with MTJ, GBW, and damages expert Kennedy re: responding to arguments in Ali Saad declaration	Depositions
4/13/2022	Travis Close	0.4	\$850	\$340	Email to MTJ re: summary of Dr Ali Saad analysis	Depositions
4/13/2022	Travis Close	1.2	\$850	\$1,020	Depo prep -- continue analyzing cites in Ali Saad declaration for accuracy (#s 68-90)	Depositions
4/13/2022	Travis Close	1.3	\$850	\$1,105	Depo prep -- continue analyzing cites in Ali Saad declaration for accuracy (#s 90-111)	Depositions
4/13/2022	Travis Close	1.1	\$850	\$935	Depo prep -- continue analyzing cites in Ali Saad declaration for accuracy (#s 111-132)	Depositions
4/13/2022	Travis Close	1.5	\$850	\$1,275	Depo prep -- continue analyzing cites in Ali Saad declaration for accuracy (#s 132-162)	Depositions
4/14/2022	Guy Wallace	9.2	\$1,350	\$12,420	prepare for and take deposition of Anderson; com's with RLS re same (.5)	Depositions
4/14/2022	Mark Johnson	1.3	\$1,150	\$1,495	call w J Thornton re Saad depo and data for same	Depositions
4/14/2022	Mark Johnson	0.3	\$1,150	\$345	call w/ Thornton and Marks re Jacobson and Saad depos	Depositions
4/14/2022	Mark Johnson	5.8	\$1,150	\$6,670	prep for Saad depo	Depositions
4/14/2022	Mark Johnson	1.5	\$1,150	\$1,725	additional prep for Saad depo	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/14/2022	Mark Johnson	3.5	\$1,150	\$4,025	travel to LA for Saad depo, including to airport, security, wait time, from airport, rental car, to hotel	Depositions
4/14/2022	Rachel Steyer	0.2	\$750	\$150	received incoming call from current resident, determined assigned to DMS	Class Outreach and Contact
4/14/2022	Rachel Steyer	7.0	\$750	\$5,250	attended expert depo and assisted GBW with exhibits	Depositions
4/14/2022	Rachel Steyer	0.3	\$750	\$225	call with GBW to discuss deposition	Depositions
4/14/2022	Rachel Steyer	0.2	\$750	\$150	reviewing exhibits and outline prior to start of depo	Depositions
4/14/2022	Rachel Steyer	0.2	\$750	\$150	email to LEC, GBW, MTJ concerning tracking depo exhibits, providing link to exhibits marked in expert witness depo	Depositions
4/14/2022	Travis Close	0.6	\$850	\$510	Review and analyze literature produced by defendants before depo as relied upon by Ali Saad: Reference guide on statistics; statistical reasoning in law and public policy	Depositions
4/14/2022	Travis Close	0.4	\$850	\$340	Review and analyze literature produced by defendants before depo as relied upon by Ali Saad: Reference guide on statistics; survey research in litigation, reference manual on scientific evidence	Depositions
4/14/2022	Travis Close	1.3	\$850	\$1,105	Ali Saad deposition -- commute from home to airport (via BART and BART airport connection)	Depositions
4/14/2022	Travis Close	3.0	\$850	\$2,550	Ali Saad deposition -- Flight from OAK airport to LAX	Depositions
4/14/2022	Travis Close	1.1	\$850	\$935	Review and analyze literature produced by defendants before depo as relied upon by Ali Saad: Reference guide on statistics; Damages theories and causation issues; econometrics models, chapter 2	Experts (Including Retention)
4/14/2022	Travis Close	1.7	\$850	\$1,445	Dep prep -- analyze data relied upon by Flores for simple math analysis and Ali Saad's criticisms and attaches on methodology of same	Experts (Including Retention)
4/15/2022	Guy Wallace	0.5	\$1,350	\$675	analysis of testimony of Anderson	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/15/2022	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re deposition of Dr. Saad	Depositions
4/15/2022	Guy Wallace	3.6	\$1,350	\$4,860	revise and edit supplemental disclosures; com's with RLS re same (.2)	Other Motions
4/15/2022	Mark Johnson	7.0	\$1,150	\$8,050	Deposition of expert Ali Saad	Depositions
4/15/2022	Mark Johnson	0.2	\$1,150	\$230	com w/ GBW during break in Saad depo re testimony	Depositions
4/15/2022	Mark Johnson	0.8	\$1,150	\$920	depo setup and prep, coms w/ Veritext staff re exhibits, debriefing w/ TCC after depo	Depositions
4/15/2022	Mark Johnson	0.4	\$1,150	\$460	travel to Saad depo from hotel & return	Depositions
4/15/2022	Rachel Steyer	0.2	\$750	\$150	reviewing co-counsel BSU's proposed edits to class member declarations	Class Certification
4/15/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising GSL draft declaration	Class Certification
4/15/2022	Rachel Steyer	0.5	\$750	\$375	call with co-counsel BSU to discuss proposed revisions and comments to draft declaration	Class Certification
4/15/2022	Rachel Steyer	0.9	\$750	\$675	meeting with RBGG co-counsel to review and discuss upcoming depo schedules and assignemnts	Class Certification
4/15/2022	Rachel Steyer	0.3	\$750	\$225	call with KGJ to review and discuss questions about competency of potential declarant	Class Certification
4/15/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising GSL draft declaration	Class Certification
4/15/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising SLS draft declaration	Class Certification
4/15/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising OJO draft declaration	Class Certification
4/15/2022	Rachel Steyer	0.2	\$750	\$150	communications on teams with GSL, DMS, KGJ, RDR concerning preparing and finalizing declarations, class outreach efforts	Class Outreach and Contact
4/15/2022	Rachel Steyer	0.2	\$750	\$150	reviewing email from DM co-counsel summarizing expert witness depo	Depositions
4/15/2022	Rachel Steyer	0.5	\$750	\$375	call with the POAs (daughter and son-in-law) of current Brookdale resident and deponent concerning noticed deposition of their mother, discussed moving off calendar and signing withdrawal statement	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/15/2022	Rachel Steyer	0.3	\$750	\$225	email to GBW, TCC, MTJ and co-counsel memorializing conversation with son in law and daughter of Brookdale happy camper noticed deponent	Depositions
4/17/2022	Guy Wallace	0.6	\$1,350	\$810	analysis of potential motion to strike Defendants' expert declarations	Other Motions
4/18/2022	Mark Johnson	2.5	\$1,150	\$2,875	work on outlining and drafting reply dec of JM iso mtn for class certification	Class Certification
4/18/2022	Mark Johnson	0.3	\$1,150	\$345	review proposed revisions to class member declarations and com w/ RLS re same	Class Certification
4/18/2022	Mark Johnson	0.5	\$1,150	\$575	review D's 2nd set of document request on Plaintiffs	Discovery (Non-Deposition)
4/18/2022	Mark Johnson	0.4	\$1,150	\$460	calls w/ GBW re joint discovery motions, Ds reply memos in support of Daubert motions.	Other Motions
4/18/2022	Mark Johnson	1.8	\$1,150	\$2,070	review D's reply memos in support of Daubert motions	Other Motions
4/18/2022	Mark Johnson	1.4	\$1,150	\$1,610	prepare comparison copy of D revised version of joint ltr brief on J-H rogs' draft email to COC re same; make revisions to P section and draft emails x2 to OC re filling same; locate exhibits for same.	Other Motions
4/18/2022	Rachel Steyer	0.5	\$750	\$375	editing and revising OJO draft declaration	Class Certification
4/18/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising DMS draft declaration	Class Certification
4/18/2022	Rachel Steyer	0.3	\$750	\$225	reviewing GSL proposed edits following read through call, making tweaks to draft	Class Certification
4/18/2022	Rachel Steyer	0.7	\$750	\$525	preparing for scheduled depo, reviewing documents and notes	Depositions
4/18/2022	Rachel Steyer	3.0	\$750	\$2,250	combined travel to SFO to LAX to attend depo, return flight LAX to SFO, round trip car service to and from depo venue	Depositions
4/18/2022	Rachel Steyer	0.8	\$750	\$600	reviewing documents in production corresponding to likely declarants	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/18/2022	Rachel Steyer	0.2	\$750	\$150	reviewing defendants' second set of requests for production	Discovery (Non-Deposition)
4/18/2022	Travis Close	0.7	\$850	\$595	Review analysis by EPO on instances of Brookdale's operational audits mentioned in depo testimony and company filings	Case Organization, Planning and Strategy
4/18/2022	Travis Close	0.2	\$850	\$170	Email to EPO re: review complete of Brookdale's operational audits and next steps	Case Organization, Planning and Strategy
4/18/2022	Travis Close	0.3	\$850	\$255	Email to Doug cross re: Def's opposition brief for review; next steps for strategy in drafting reply declaration	Case Organization, Planning and Strategy
4/18/2022	Travis Close	0.9	\$850	\$765	Further review and analysis of evidence of implementation of the Fleet Safety Policy at individual facilities - # BKD1798173-BKD1896763 (123-150 of 936)	Discovery (Non-Deposition)
4/18/2022	Travis Close	1.6	\$850	\$1,360	Legal research re: exclusion of expert testimony based on misleading graphical representations	Discovery (Non-Deposition)
4/18/2022	Travis Close	0.3	\$850	\$255	Review and analyze final version of joint discovery letter re: plans of operation + exhibits	Discovery (Non-Deposition)
4/18/2022	Travis Close	0.6	\$850	\$510	Review and analyze evidence of implementation of Fleet Safety Policy through BEST audit standards compliance	Discovery (Non-Deposition)
4/18/2022	Travis Close	1.0	\$850	\$850	Further review and analysis of evidence of implementation of the Fleet Safety Policy at individual facilities - # BKD1896763-BKD2044087 (150-205 of 936)	Discovery (Non-Deposition)
4/18/2022	Travis Close	1.8	\$850	\$1,530	Analyze prior expert reports filed by Dr. Saad for evidence of depiction of data in graphical representations	Experts (Including Retention)
4/19/2022	Rachel Steyer	0.4	\$750	\$300	editing and reviewing DMS draft declaration	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/19/2022	Rachel Steyer	0.5	\$750	\$375	editing and reviewing DMS draft declaration	Class Certification
4/19/2022	Rachel Steyer	0.3	\$750	\$225	call with OJO to discuss and review feedback on draft declaration	Class Certification
4/19/2022	Rachel Steyer	0.4	\$750	\$300	call with GSL to review and discuss edits and draft declaration as well as review status of all draft declarations	Class Certification
4/19/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising GSL draft declaration	Class Certification
4/19/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising DMS edits to draft declaration after read through with declarant	Class Certification
4/19/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising GSL draft declaration	Class Certification
4/19/2022	Rachel Steyer	0.7	\$750	\$525	reviewing and incorporating co-counsel's edits and feedback to draft declarations	Class Certification
4/19/2022	Rachel Steyer	0.4	\$750	\$300	call with DMS to review status of draft declarations	Class Outreach and Contact
4/19/2022	Rachel Steyer	0.4	\$750	\$300	communications on teams with OJO, DMS, KGJ, GSL, SLS concerning class outreach and declaraiton drafting	Class Outreach and Contact
4/19/2022	Rachel Steyer	1.0	\$750	\$750	meeting with RBGG co-counsel to review and discuss upcoming depositions, strategies for communicating with POAs/deponents, obtaining withdrawal statements	Depositions
4/19/2022	Rachel Steyer	0.6	\$750	\$450	reviewing production of PSPs/assessments to double check for documents corresponding to declarants	Discovery (Non-Deposition)
4/19/2022	Travis Close	1.2	\$850	\$1,020	Review and analyze Defs' reply to motions to exclude testimony of Kailes and Cross + exhibits	Discovery (Non-Deposition)
4/19/2022	Travis Close	0.9	\$850	\$765	Analyze recent facility evaluation reports and complaint investigation reports issues for Paulin Creek, San Jose, Clairemont, Nohl Ranch, Napa, Serento Casa, Riverwalk, Elk Grove, and Auburn facilities facilities by the Cal DSS	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/19/2022	Travis Close	1.2	\$850	\$1,020	Kailes -- review her analysis of the supplemental facilities and translate her coding into chart (Alhambra-Chanate facilities)	Experts (Including Retention)
4/19/2022	Travis Close	1.3	\$850	\$1,105	Kailes -- review her analysis of the supplemental facilities and translate her coding into chart (Chanate-Kettleman Lane facilities)	Experts (Including Retention)
4/19/2022	Travis Close	1.2	\$850	\$1,020	Kailes -- review her analysis of the supplemental facilities and translate her coding into chart (Lodi - San Marcos facilities)	Experts (Including Retention)
4/19/2022	Travis Close	1.1	\$850	\$935	Kailes -- review her analysis of the supplemental facilities and translate her coding into chart (San Pablo - Windsor facilities)	Experts (Including Retention)
4/19/2022	Travis Close	0.8	\$850	\$680	Legal research re: Def's contention that factual foundation to to be weigned differently than issues of reliability in expert testimony	Pleadings and Motions Re: Pleadings
4/20/2022	Guy Wallace	0.8	\$1,350	\$1,080	team zoom re reply brief; declaration of GBW; depositions of happy campers; declarations from putative class members; potential Daubert motion; evidentiary issues	Class Certification
4/20/2022	Guy Wallace	1.4	\$1,350	\$1,890	review and analysis of draft of GBW reply declarations re MCC; com's with MTJ re same (.3)	Class Certification
4/20/2022	Mark Johnson	1.8	\$1,150	\$2,070	review targeted docs in doc mgmt system from Ds doc production indicting corporate control	Class Certification
4/20/2022	Mark Johnson	0.8	\$1,150	\$920	review and analyze draft dec f rom AX listing evidence of corporate control	Class Certification
4/20/2022	Mark Johnson	0.8	\$1,150	\$920	team zoom call to discuss progress and planning on tasks and doc preparation for reply brief, happy camper depos, motion in limine re expert reports	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/20/2022	Mark Johnson	1.5	\$1,150	\$1,725	Id topics for Waters / Mastin reply declarations; download and review site inspection reports and evaluate formatting options and approaches for revisions to same	Class Certification
4/20/2022	Mark Johnson	0.4	\$1,150	\$460	review email from OC re joint letter brief on J-H rogs; coms w/ staff re filing same; finalize ltr and pull together exhibits.	Other Motions
4/20/2022	Rachel Steyer	0.8	\$750	\$600	weekly meeting with MTJ, GBW, TCC and co-counsel to reivew and discuss outstanding tasks and assignments in preparation for reply brief	Case Organization, Planning and Strategy
4/20/2022	Rachel Steyer	0.2	\$750	\$150	call with RDR to review preparing authorization forms for declarants to sign	Class Certification
4/20/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising GSL draft declaration	Class Certification
4/20/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising DMS draft declaration	Class Certification
4/20/2022	Rachel Steyer	0.3	\$750	\$225	call with DMS to review and discuss draft declaration	Class Certification
4/20/2022	Rachel Steyer	0.3	\$750	\$225	conducted read through call with declarant	Class Certification
4/20/2022	Rachel Steyer	0.2	\$750	\$150	edting and revising KGJ draft declaration	Class Certification
4/20/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising RVR draft declaration	Class Certification
4/20/2022	Rachel Steyer	0.6	\$750	\$450	reviewing Rosales case circulated by co-counsel (denying class certification in part due to conflict in declarants' testimony)	Class Certification
4/20/2022	Rachel Steyer	0.3	\$750	\$225	email to OJO, SLS, DMS, KGJ, GSI cocnering doucmnts and outreach efforts	Class Outreach and Contact
4/20/2022	Rachel Steyer	0.2	\$750	\$150	call with DMS to review and discuss various draft declarations and outreach efforts	Class Outreach and Contact
4/20/2022	Rachel Steyer	0.6	\$750	\$450	communications on teams with RVR, DMS, KGJ, OJO, GSL concerning class outreach and declartion drafting efforts	Class Outreach and Contact
4/20/2022	Rachel Steyer	0.4	\$750	\$300	reviewing defendants' reply iso motion to exclude declaration and testimony of june kailes	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/20/2022	Travis Close	0.8	\$850	\$680	Team meeting re: happy camper depositions, joint discovery letter brief/hearing with JB, reply declarations, and motions to strike	Case Organization, Planning and Strategy
4/20/2022	Travis Close	0.5	\$850	\$425	Review and analyze final draft of joint letter brief re: Ps' interrogatories for any lingering errors/mistakes	Communications With Opposing Counsel
4/20/2022	Travis Close	1.2	\$850	\$1,020	Review and analyze results for "DDCM call" showing monthly meeting agendas for district managers for evidence of implementation of fleet safety policy	Discovery (Non-Deposition)
4/20/2022	Travis Close	1.4	\$850	\$1,190	Further review and analysis of evidence of implementation of the Fleet Safety Policy at individual facilities - # BKD2044087-BKD2086963 (205-261 of 936)	Discovery (Non-Deposition)
4/20/2022	Travis Close	0.2	\$850	\$170	Email to JIK re: additional supplemental plans for review and time for scheduling call	Experts (Including Retention)
4/20/2022	Travis Close	0.4	\$850	\$340	Email to Doug Cross re: strategy for next stages of fleet safety policy analysis	Experts (Including Retention)
4/20/2022	Travis Close	0.2	\$850	\$170	Email to Doug Cross re: possible dates for scheduling next meeting	Experts (Including Retention)
4/20/2022	Travis Close	0.2	\$850	\$170	Email to JIK re: receipt of reviews and coordinating time for phone call	Experts (Including Retention)
4/20/2022	Travis Close	0.8	\$850	\$680	Analyze additional supplemental plans reviewed by JIK; incorporate her analysis into spreadsheet tracking data	Experts (Including Retention)
4/21/2022	Mark Johnson	3.3	\$1,150	\$3,795	review of Anderson depo transcript and check testimony against declaration	Class Certification
4/21/2022	Mark Johnson	1.5	\$1,150	\$1,725	prep for zoom hearing with Judge Beeler re joint letters ECF481 and 483	Other Motions
4/21/2022	Mark Johnson	1.1	\$1,150	\$1,265	online for zoom hearing with Judge Beeler on ECF 481 and 483	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/21/2022	Mark Johnson	0.5	\$1,150	\$575	draft email summary of zoom hearing w/ MJ Beeler re joint letters 481 and 483 for COC; coms w/ COC re same	Other Motions
4/21/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising GSL draft declaration	Class Certification
4/21/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising GSL draft declaration	Class Certification
4/21/2022	Rachel Steyer	0.2	\$750	\$150	call with DMS to discuss and review draft declaration	Class Certification
4/21/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising DMS proposed additions to declaration following read through call with declarant	Class Certification
4/21/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising DMS draft declaration	Class Certification
4/21/2022	Rachel Steyer	0.3	\$750	\$225	reviewing and incorporating BSU edits to draft RDR declaration, adding in revised language	Class Certification
4/21/2022	Rachel Steyer	0.2	\$750	\$150	reviewing and incorporating BSU edits into OJOs draft declarations	Class Certification
4/21/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising DMS draft declaration	Class Certification
4/21/2022	Rachel Steyer	0.4	\$750	\$300	communications on teams with DMS, OJO, RDR, GSL concerning class outreach and declaration drafting	Class Certification
4/21/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising DMS draft declaration	Class Certification
4/21/2022	Rachel Steyer	0.4	\$750	\$300	spoke with RP of current resident, discussed case and next steps	Class Outreach and Contact
4/21/2022	Rachel Steyer	0.4	\$750	\$300	preparing for depo, reviewing notes, outline, documents corresponding to deponent	Depositions
4/21/2022	Rachel Steyer	0.3	\$750	\$225	call with GCG of RBGG to review and discuss preparations for depo	Depositions
4/21/2022	Rachel Steyer	0.3	\$750	\$225	reviewing Bennie Williams depo transcript	Depositions
4/21/2022	Rachel Steyer	1.0	\$750	\$750	flhgt from OAK to SNA to attend and take depo	Depositions
4/21/2022	Rachel Steyer	0.4	\$750	\$300	reviewing notes and outline for depo prep	Depositions
4/21/2022	Rachel Steyer	0.2	\$750	\$150	reviewing documents in production corresponding to declarant	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/21/2022	Travis Close	0.2	\$850	\$170	Email to MTJ re: debrief after discovery hearing with judge beeler	Case Organization, Planning and Strategy
4/21/2022	Travis Close	0.5	\$850	\$425	Meet with RLS re: debrief on happy camper depositions taken place in last two weeks	Depositions
4/21/2022	Travis Close	1.2	\$850	\$1,020	Analyze evidence of Brookdale's process for UTO (unit turn over) Requisitions in the Coupa software system -- evidence of centralized policies/systems	Discovery (Non-Deposition)
4/21/2022	Travis Close	0.9	\$850	\$765	Further review and analysis of evidence of implementation of the Fleet Safety Policy at individual facilities - # BKD2086963-BKD2177512 (261-311 of 936)	Discovery (Non-Deposition)
4/21/2022	Travis Close	0.8	\$850	\$680	Further review and analysis of evidence of implementation of the Fleet Safety Policy at individual facilities - # BKD2177512-BKD2312632 (311-368 of 936)	Discovery (Non-Deposition)
4/21/2022	Travis Close	0.9	\$850	\$765	Draft questions and email to JIK for today's call re: coding issues for supplementnal plan analysis	Experts (Including Retention)
4/21/2022	Travis Close	0.9	\$850	\$765	Call with june kailes re: analysis of supplemental plans and next steps in drafting reply declaration	Experts (Including Retention)
4/22/2022	Mark Johnson	0.1	\$1,150	\$115	email exchanges w/ Mastin, Waters re meeting to discuss reply declarations, revised site inspection reports	Class Certification
4/22/2022	Mark Johnson	0.1	\$1,150	\$115	email exchange w/ Thornton, Marks re reply decs from experts in support of class cert, motion in limine re opinions of Ds experts	Class Certification
4/22/2022	Mark Johnson	2.0	\$1,150	\$2,300	complete review of Anderson deposition and exhibits	Class Certification
4/22/2022	Mark Johnson	0.2	\$1,150	\$230	coms w/ RLS and co-counsel re expert depo transcripts and exhibits.	Class Certification
4/22/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising GSL draft declaration	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/22/2022	Rachel Steyer	0.2	\$750	\$150	call with declarant to discuss preparing and mailing declaration for review and signature	Class Certification
4/22/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising GSL draft declaration	Class Certification
4/22/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising SLS draft declaration	Class Certification
4/22/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising RVR draft declaration	Class Certification
4/22/2022	Rachel Steyer	0.2	\$750	\$150	reviewed notes and prepared for deposition	Depositions
4/22/2022	Rachel Steyer	0.3	\$750	\$225	email to GBW, TCC, MTJ and RBGG and BSU co-counsel summarizing notes and thoughts following deposition	Depositions
4/22/2022	Rachel Steyer	0.8	\$750	\$600	conducted and attended deposition of Brookdale declarant	Depositions
4/22/2022	Rachel Steyer	0.2	\$750	\$150	call with JSY during break at depo to review and discuss whether to proceed further	Depositions
4/22/2022	Rachel Steyer	0.2	\$750	\$150	call with GBW to discuss depo	Depositions
4/22/2022	Rachel Steyer	1.0	\$750	\$750	return flight from SNA to OAK following completing deposition	Depositions
4/22/2022	Rachel Steyer	0.4	\$750	\$300	reviewing rough depo transcript of Carl Mariz	Depositions
4/22/2022	Travis Close	0.9	\$850	\$765	Review and analyze depo transcript of Douglas Anseron (pages 1-150)	Depositions
4/22/2022	Travis Close	0.8	\$850	\$680	Review and analyze depo transcript of Douglas Anseron (pages 150-306)	Depositions
4/22/2022	Travis Close	0.9	\$850	\$765	Further review and analysis of evidence of implementation of the Fleet Safety Policy at individual facilities - # BKD2312632-BKD2389509 (368-405 of 936)	Discovery (Non-Deposition)
4/22/2022	Travis Close	0.8	\$850	\$680	Further review and analysis of evidence of implementation of the Fleet Safety Policy at individual facilities - # BKD2389509-BKD2461185 (405-464 of 936)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/22/2022	Travis Close	1.1	\$850	\$935	Further review and analysis of evidence of implementation of the Fleet Safety Policy at individual facilities - # BKD2461185-BKD2528219 (464-510 of 936)	Discovery (Non-Deposition)
4/22/2022	Travis Close	0.9	\$850	\$765	Further review and analysis of evidence of implementation of the Fleet Safety Policy at individual facilities - # BKD2528219-BKD2608606 (510-573 of 936)	Discovery (Non-Deposition)
4/22/2022	Travis Close	1.3	\$850	\$1,105	Further review and analysis of evidence of implementation of the Fleet Safety Policy at individual facilities - # BKD2608606-BKD2648475 (573-651 of 936)	Discovery (Non-Deposition)
4/22/2022	Travis Close	1.4	\$850	\$1,190	Further review and analysis of evidence of implementation of the Fleet Safety Policy at individual facilities - # BKD2648475-BKD2794130 (651-756 of 936)	Discovery (Non-Deposition)
4/23/2022	Mark Johnson	2.3	\$1,150	\$2,645	work on outline of issues for Waters and Mastin reply declarations; review Anderson declaration and inspection reports for same.	Class Certification
4/24/2022	Guy Wallace	4.8	\$1,350	\$6,480	preparation of outline of class cert reply brief; legal research and analysis re differences between CLRA claim and breach of contract; D's "benefit of the bargain" defense	Class Certification
4/24/2022	Mark Johnson	0.1	\$1,150	\$115	email to COC DM, JT, BU, GBW re call re expert reply decs and MIL	Class Certification
4/24/2022	Mark Johnson	0.3	\$1,150	\$345	make additional edits to outline for topics of Waters/Mastin reply dec and email to GBW, TCC re same and times to meet w/ experts to discuss	Class Certification
4/24/2022	Mark Johnson	4.4	\$1,150	\$5,060	review and analyze Sheldon Jacobson depo and take notes re same	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/24/2022	Mark Johnson	0.1	\$1,150	\$115	review and respond to process sewer re docs and dec responsive to DSS CAB subpoena	Discovery (Non-Deposition)
4/25/2022	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of Saad Declaration; preparation of list of points and exhibits to respond to	Class Certification
4/25/2022	Guy Wallace	0.9	\$1,350	\$1,215	zoom with Marks, JT; BU; MTJ re response to Saad and further analyses	Class Certification
4/25/2022	Guy Wallace	4.8	\$1,350	\$6,480	review and analysis of D's opposition to class certification; preparation of outline of reply brief and responsive points	Class Certification
4/25/2022	Mark Johnson	0.9	\$1,150	\$1,035	Video conference w/ GBW, Thornton, Marks, Umpierre re expert reply declarations and data runs iso class certification, mtn in limine.	Class Certification
4/25/2022	Mark Johnson	2.0	\$1,150	\$2,300	research re authentication and admissibility of documents on class cert motion.	Class Certification
4/25/2022	Mark Johnson	0.6	\$1,150	\$690	prep for call with Thornton and Marks, including review of Saad declaration and review notes from GBW re same	Class Certification
4/25/2022	Mark Johnson	2.0	\$1,150	\$2,300	review Saad depo transcript	Depositions
4/25/2022	Mark Johnson	1.5	\$1,150	\$1,725	further review and analysis of Saad depo transcript	Depositions
4/25/2022	Mark Johnson	1.2	\$1,150	\$1,380	review D expert decs and begin outline for mtn to exclude certain opinions	Other Motions
4/25/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising GSL draft declaration	Class Certification
4/25/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising DMS draft declaration	Class Certification
4/25/2022	Rachel Steyer	0.2	\$750	\$150	call with KGJ to review and discuss draft declarations and proposed edits	Class Certification
4/25/2022	Rachel Steyer	0.2	\$750	\$150	reviewing and updating SLS changes to draft declaration following read through	Class Certification
4/25/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising GSL draft declaration	Class Certification
4/25/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising GSL draft declaration	Class Certification
4/25/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising OJO draft declaration	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/25/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising OJO draft declaration	Class Certification
4/25/2022	Rachel Steyer	0.2	\$750	\$150	reviewing and drafting email to KGJ for follow up email to class memebrs	Class Outreach and Contact
4/25/2022	Rachel Steyer	0.2	\$750	\$150	call with GSL to review and discuss completed intake	Class Outreach and Contact
4/25/2022	Rachel Steyer	0.2	\$750	\$150	reviewing complaint documents circulated by RBGG JSY, checking to see if resident was listed in sharepoint outreach lists, responding to email	Class Outreach and Contact
4/25/2022	Rachel Steyer	0.2	\$750	\$150	email to TBS providing list of letters that need mailing to class members and declarants	Class Outreach and Contact
4/25/2022	Rachel Steyer	0.5	\$750	\$375	communications on teams with GSL, SLS, KGJ, DMS, OJO concerning class outreach and declaration drafting	Class Outreach and Contact
4/25/2022	Rachel Steyer	0.2	\$750	\$150	reviewing production for documents corresponding to likely declarant	Discovery (Non-Deposition)
4/25/2022	Travis Close	0.6	\$850	\$510	Review and analyze depo transcript of Jacobson (pages 1- 82)	Depositions
4/25/2022	Travis Close	0.6	\$850	\$510	Review and analyze depo transcript of Jacobson (pages 1-207)	Depositions
4/25/2022	Travis Close	0.6	\$850	\$510	Review and analyze depo transcript of Jacobson (pages 207-284)	Depositions
4/25/2022	Travis Close	0.9	\$850	\$765	Review and analyze depo transcript of Jacobson (pages 284-375)	Depositions
4/25/2022	Travis Close	1.6	\$850	\$1,360	Review and analyze evidence of complaints re understaffing from resident Mary Cole in our records	Discovery (Non-Deposition)
4/25/2022	Travis Close	0.3	\$850	\$255	Email to Douglas Cross re: scheduling next time to talk and scope of conversation	Experts (Including Retention)
4/25/2022	Travis Close	1.8	\$850	\$1,530	Revisions to index of reply evidence for Doug Cross reply declaration	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/25/2022	Travis Close	0.3	\$850	\$255	Email to Doug Cross re: summary of evidence of implementation of FSP in spreadsheet; plans for call tomorrow	Experts (Including Retention)
4/25/2022	Travis Close	0.8	\$850	\$680	Review and analyze dec of Jacobson iso Ds' opposition to class cert	Pleadings and Motions Re: Pleadings
4/26/2022	Guy Wallace	5.7	\$1,350	\$7,695	review and analysis of Defendants' opposition to class certification; Declaration of Anderson re same; preparation of outline and reply points for reply	Class Certification
4/26/2022	Guy Wallace	2.6	\$1,350	\$3,510	review and analysis of Defendants' opposition to class certification; preparation of reply arguments and points	Class Certification
4/26/2022	Guy Wallace	1.4	\$1,350	\$1,890	zoom with Waters; Mastin; MTJ; TCC re preparation of reply declarations re motion for class certification	Experts (Including Retention)
4/26/2022	Guy Wallace	0.9	\$1,350	\$1,215	prepare for and participate in tc with Kennedy; LP; MTJ re preparation of reply declaration re MCC	Experts (Including Retention)
4/26/2022	Mark Johnson	1.5	\$1,150	\$1,725	video conference w/ Mastin, Waters and Wallace re reply declaration iso mtn for class certification, revisions to inspection reports	Class Certification
4/26/2022	Mark Johnson	1.0	\$1,150	\$1,150	video conference w/ P Kennedy, Lindsay Petitte and GBW re issues for reply dec iso class certification.	Class Certification
4/26/2022	Mark Johnson	0.3	\$1,150	\$345	call w/ COC Yellin re expert site inspection reports and revisions of same, motions in limine re D's expert opinions, tracking re-filed pleadings from defendants, project re benchmarks v actual of EDs who testified re benchmarks not used.	Class Certification
4/26/2022	Mark Johnson	2.0	\$1,150	\$2,300	work on memo re evidentiary issues for class cert mtn and reply	Class Certification
4/26/2022	Mark Johnson	0.2	\$1,150	\$230	review draft format for revised site inspection reports; com w/ JY re same	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/26/2022	Mark Johnson	0.3	\$1,150	\$345	draft email memo to RLS re analysis of Anderson markups of P expert reports and tracking/documenting same	Class Certification
4/26/2022	Mark Johnson	0.4	\$1,150	\$460	draft email to COC re analysis of ED declarations and testimony re benchmarks and staffing and tracking actual v benchmark data for each declarant's tenure as ED; identify and forward docs for same.	Class Certification
4/26/2022	Mark Johnson	1.2	\$1,150	\$1,380	prep for calls w/ experts Mastin, Waters and Kennedy, including review of reply dec issues outlines, report format, Saad declaration and GBW notes.	Class Certification
4/26/2022	Mark Johnson	0.1	\$1,150	\$115	email exchange w/ DSS counsel re mtg to discuss compliance w/ DSS CAB subpoena.	Class Certification
4/26/2022	Mark Johnson	1.4	\$1,150	\$1,610	collect, print and review Anderson mark-ups of P experts' access reports	Class Certification
4/26/2022	Mark Johnson	0.2	\$1,150	\$230	calls w/ GBW (x) re issues for call with Mastin and Waters and take-aways from call with Kennedy for class cert reply decs.	Experts (Including Retention)
4/26/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising DMS draft declaration	Class Certification
4/26/2022	Rachel Steyer	0.3	\$750	\$225	received call from declarant who wished to make changes to draft declaration, discussed specific question he had re accessible devices	Class Certification
4/26/2022	Rachel Steyer	0.6	\$750	\$450	reviewing and incorporating BSU edits into draft declarations	Class Certification
4/26/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising RVR draft declaration	Class Certification
4/26/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising OJO draft declaration	Class Certification
4/26/2022	Rachel Steyer	0.3	\$750	\$225	communications on teams with RVR, DMS, OJO, TRB, GSL concerning outreach and declaration drafting efforts	Class Outreach and Contact
4/26/2022	Rachel Steyer	0.2	\$750	\$150	reviewing production for documents corresponding to potential declarant	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/26/2022	Rachel Steyer	0.2	\$750	\$150	reviewing production for documents corresponding to likely declarants	Discovery (Non-Deposition)
4/26/2022	Rachel Steyer	0.5	\$750	\$375	reviewing documents provided by family member of former resident	Discovery (Non-Deposition)
4/26/2022	Rachel Steyer	2.0	\$750	\$1,500	reviewing expert access reports to tabulate disagreements with plaintiffs access barrier measurements	Experts (Including Retention)
4/26/2022	Travis Close	0.5	\$850	\$425	Prep for call with Doug Cross (review Def's opposition brief and fleet safety policy analysis) re: reply declaration	Case Organization, Planning and Strategy
4/26/2022	Travis Close	0.4	\$850	\$340	Meet with MTJ re: certification needed for building record responses by jurisdictions	Discovery (Non-Deposition)
4/26/2022	Travis Close	1.3	\$850	\$1,105	Legal research re: FRE 802 and authenticity of records received from PRA requests	Discovery (Non-Deposition)
4/26/2022	Travis Close	1.4	\$850	\$1,190	Legal research re: cases where PRA evidence was used that discuss admissibility	Discovery (Non-Deposition)
4/26/2022	Travis Close	1.6	\$850	\$1,360	call with doug cross re: strategy for reply declaration	Experts (Including Retention)
4/26/2022	Travis Close	0.9	\$850	\$765	Review and analyze Brookdale's declarations of residents submitted in opposition to class cert to determine how many were satisfied with Brookdale's staffing services	Pleadings and Motions Re: Pleadings
4/26/2022	Travis Close	1.6	\$850	\$1,360	Meeting with MTJ, GBW, architectural experts re: reply declarations	Pleadings and Motions Re: Pleadings
4/27/2022	Guy Wallace	3.6	\$1,350	\$4,860	legal research and analysis re Defendants' arguments re contractual privity and CLRA and UCL; use of claims forms; manageability; test for an operator or manager under the ADA and Unruh Act; requirements for (b)(2) classes with respect to indivisibility of injunctive relief	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/27/2022	Guy Wallace	1.6	\$1,350	\$2,160	legal research and analysis re Article III standing and Hinojos decision and its progeny	Class Certification
4/27/2022	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ; RLS re analysis of Anderson facility reports; depositions of D's putative class member witnesses	Class Certification
4/27/2022	Guy Wallace	1.7	\$1,350	\$2,295	legal research and analysis re TransUnion and Ninth Circuit precedents re standing and class certification	Class Certification
4/27/2022	Guy Wallace	1.4	\$1,350	\$1,890	legal research and analysis re ADA cases and injury-in-fact; standing; class certification	Class Certification
4/27/2022	Mark Johnson	2.5	\$1,150	\$2,875	complete research memo re evidentiary issues related to admissibility and authenticity and com w/ COC re same	Class Certification
4/27/2022	Mark Johnson	3.2	\$1,150	\$3,680	work on Mastin draft reply declaration	Class Certification
4/27/2022	Mark Johnson	0.3	\$1,150	\$345	mtg w/ RLS re analysis of Anderson expert report mark-ups and documentation of same	Class Certification
4/27/2022	Mark Johnson	0.3	\$1,150	\$345	review and suggest edits re class member dec and com w/ RLS re same	Class Certification
4/27/2022	Mark Johnson	0.2	\$1,150	\$230	review spreadsheet from KS at RBGG re ED and HRW tenures and coms w/ her and Marks re same and running data analysis	Class Certification
4/27/2022	Mark Johnson	0.7	\$1,150	\$805	conference call w/ DSS attorneys Joseph Lam and Sean Avalos re CAB document subpoenas.	Discovery (Non-Deposition)
4/27/2022	Mark Johnson	0.3	\$1,150	\$345	prep for mtg w/ DSS attorneys; review subpoena and prior notes, correspondence	Discovery (Non-Deposition)
4/27/2022	Mark Johnson	0.3	\$1,150	\$345	review email from BBK re call w/ OC Rutner; review correspondence from Rutner re same and coms w/ GBW and RBGG re depo cancellations of happy campers.	Discovery (Non-Deposition)
4/27/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising DMS draft declaration	Class Certification
4/27/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising DMS draft declaration	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/27/2022	Rachel Steyer	0.4	\$750	\$300	reviewing and incorporating MTJ and BSU edits into SLS draft declaration	Class Certification
4/27/2022	Rachel Steyer	0.2	\$750	\$150	call with OJO to review and discuss communications with class members about description of declaration process	Class Outreach and Contact
4/27/2022	Rachel Steyer	0.5	\$750	\$375	conversation with GBW and MTJ regarding reviewing access expert reports and compiling/preparing spreadsheet	Experts (Including Retention)
4/27/2022	Rachel Steyer	2.3	\$750	\$1,725	drafting and compiling spreadsheet of access barriers comparison	Experts (Including Retention)
4/27/2022	Travis Close	0.9	\$850	\$765	Review and analyze documents summarizing the BEST audit process to determine Brookdale's grading and scoring methodology	Case Organization, Planning and Strategy
4/27/2022	Travis Close	1.1	\$850	\$935	Organize, summarize & index exhibits used to support transportation section in Def's Opposition brief	Case Organization, Planning and Strategy
4/27/2022	Travis Close	0.7	\$850	\$595	Review and analyze docs (incl. unanswered complaints to Brookdale) provided to counsel by class member Carol Lubell	Discovery (Non-Deposition)
4/27/2022	Travis Close	0.6	\$850	\$510	Analyze whether supplemental plans had info re: evac devices and safe areas for congregate	Discovery (Non-Deposition)
4/27/2022	Travis Close	2.1	\$850	\$1,785	Review and analyze data from BEST audit for Brookdale's CA facilities to determine compliance with Transportation standards	Pleadings and Motions Re: Pleadings
4/27/2022	Travis Close	2.2	\$850	\$1,870	Begin drafting reply declaration of June Kailes iso Ps' reply iso class cert (outline)	Pleadings and Motions Re: Pleadings
4/28/2022	Guy Wallace	1.2	\$1,350	\$1,620	legal research and analysis re Article III injury-in-fact and putative class members re economic loss and the separate injury of potential future harm	Class Certification
4/28/2022	Guy Wallace	5.2	\$1,350	\$7,020	preparation of outline of class cert reply brief	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/28/2022	Guy Wallace	1.4	\$1,350	\$1,890	zoom with GG; JY; BBK; AX; KS; MTJ; TCC; RLS re preparation of class cert reply papers	Class Certification
4/28/2022	Guy Wallace	1.2	\$1,350	\$1,620	review and analysis of Defendants' class cert opposition; preparation for zoom with co-counsel re preparation of reply papers; com's with MTJ re same	Class Certification
4/28/2022	Mark Johnson	1.5	\$1,150	\$1,725	team mtg via zoom re tasks for class cert reply, declarations iso reply, happy camper depositions, response to Rutner letter, evidentiary issues, draft outline of brief	Class Certification
4/28/2022	Mark Johnson	5.5	\$1,150	\$6,325	work on Mastin reply dec	Class Certification
4/28/2022	Rachel Steyer	1.7	\$750	\$1,275	meeting with RBGG co-counsel and MTJ, GBW, TCC; then separate meeting on same zoom with RBGG to discuss upcoming depositions	Case Organization, Planning and Strategy
4/28/2022	Rachel Steyer	0.4	\$750	\$300	call with GSL to review and discuss edits to draft declarations and general outreach progress	Class Certification
4/28/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising GSL draft declaration	Class Certification
4/28/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising SLS draft declaration	Class Certification
4/28/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising KGJ draft declaration	Class Certification
4/28/2022	Rachel Steyer	0.4	\$750	\$300	call with RDR to review and discuss edits to draft declaration	Class Certification
4/28/2022	Rachel Steyer	0.3	\$750	\$225	call with DMS to review question about draft declaration, general outreach efforts and assignments	Class Certification
4/28/2022	Rachel Steyer	1.3	\$750	\$975	read through call with declarant to review and finalize declaration for signature	Class Certification
4/28/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising DMS draft declaration	Class Certification
4/28/2022	Rachel Steyer	0.6	\$750	\$450	call with declarant to conduct read through call	Class Certification
4/28/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising DMS draft declaration	Class Certification
4/28/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising GSL draft declaration	Class Certification
4/28/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising OJO draft declaration	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/28/2022	Rachel Steyer	0.3	\$750	\$225	communications on teams with RDR, TRB, DMS, KGJ. SLS, OJO concerning intakes and outreach efforts	Class Outreach and Contact
4/28/2022	Rachel Steyer	0.6	\$750	\$450	reviewing notes and preparing for deposition	Depositions
4/28/2022	Travis Close	1.5	\$850	\$1,275	Team meeting with MTJ, GBW, RLS, and co-counsel re: strategy and progress for reply in support of class certification	Case Organization, Planning and Strategy
4/28/2022	Travis Close	0.2	\$850	\$170	Review and analyze letter from Defense counsel re: plaintiffs' depositions of happy camper residents	Discovery (Non-Deposition)
4/28/2022	Travis Close	2.6	\$850	\$2,210	Draft outline of reply declaration of Douglas Cross in support of class certification	Experts (Including Retention)
4/28/2022	Travis Close	0.4	\$850	\$340	Meet with MTJ re: strategy for Kailes and Cross reply declarations	Experts (Including Retention)
4/28/2022	Travis Close	0.4	\$850	\$340	Review and analyze outline of reply brief by GBW	Pleadings and Motions Re: Pleadings
4/28/2022	Travis Close	2.1	\$850	\$1,785	Draft outline of reply declaration of June Kailes in support of class certification	Pleadings and Motions Re: Pleadings
4/29/2022	Guy Wallace	0.5	\$1,350	\$675	com's with Waters; MTJ re Anderson's arguments re alleged equivalent facilitation items	Class Certification
4/29/2022	Guy Wallace	0.8	\$1,350	\$1,080	com's with DTM; JT; BU; MTJ re Labor Detail Reports and information therein re variances from benchmark and action plans; development of summary of same for reply on class certification	Class Certification
4/29/2022	Guy Wallace	4.5	\$1,350	\$6,075	review and analysis of Defendants' opposition to class certification; preparation of Plaintiffs' reply points and outline of reply brief re same	Class Certification
4/29/2022	Guy Wallace	0.6	\$1,350	\$810	com's with BU; MTJ re preparation of motion to exclude portions of Defendants' expert testimony	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/29/2022	Guy Wallace	0.3	\$1,350	\$405	com's with BBK; RLS re results of depositions of two of Defendants' "happy camper" declarants	Depositions
4/29/2022	Guy Wallace	0.5	\$1,350	\$675	review and analysis of outlines of Cross; Kailes reply declarations; com's with TCC re same	Experts (Including Retention)
4/29/2022	Mark Johnson	1.4	\$1,150	\$1,610	call w/ GBW re motions to exclude Ds expert testimony on class certification.	Other Motions
4/29/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising DMS draft declaration	Class Certification
4/29/2022	Rachel Steyer	0.2	\$750	\$150	call with GBW to review and discuss depo	Depositions
4/29/2022	Rachel Steyer	1.6	\$750	\$1,200	conducted deposition	Depositions
4/29/2022	Rachel Steyer	3.1	\$750	\$2,325	traveling (driving) to and from Folsom to take deposition	Depositions
4/29/2022	Rachel Steyer	0.4	\$750	\$300	reviewing production for documents corresponding to potential declarants	Discovery (Non-Deposition)
4/29/2022	Travis Close	0.2	\$850	\$170	Email to JIK re: outline of reply declaration attached for review	Case Organization, Planning and Strategy
4/29/2022	Travis Close	0.5	\$850	\$425	Communicate with & send deposition errata sheet to Stacia Stiner for review & signature	Depositions
4/29/2022	Travis Close	0.8	\$850	\$680	Review and analyze chart showing changes to construction dates at Brookdale CA facilities found by Def's expert Anderson, compared to dates found by Plaintiffs	Discovery (Non-Deposition)
4/29/2022	Travis Close	1.7	\$850	\$1,445	Review, index and organize Defendants' evidence offered in opposition to Ps' mtn for class cert with respect to Brookdale's transportation policies	Discovery (Non-Deposition)
4/29/2022	Travis Close	0.4	\$850	\$340	Email to doug cross re: new version of spreadsheet/analysis & outline of declaration for reply brief	Experts (Including Retention)
4/29/2022	Travis Close	0.5	\$850	\$425	Revisions to outline of Kailes declaration for reply brief	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/29/2022	Travis Close	0.7	\$850	\$595	Legal research re: title iii compliance from Seyfarth Shaw's specialty blog site	Pleadings and Motions Re: Pleadings
4/29/2022	Travis Close	1.3	\$850	\$1,105	Legal research re: whether Title iii contains language regarding requirements for emergency evacuation plans	Pleadings and Motions Re: Pleadings
4/30/2022	Guy Wallace	2.3	\$1,350	\$3,105	review and analysis of Defendants' arguments against certification of ADA physical access claim; legal research and analysis re Botosan; CREEC; Castaneda	Class Certification
4/30/2022	Guy Wallace	2.1	\$1,350	\$2,835	review and analysis of Defendants' arguments regarding lack of commonality for claims re transportation; emergency evacuation; understaffing	Class Certification
4/30/2022	Guy Wallace	2.4	\$1,350	\$3,240	review and analysis of Defendants' reliance on and citations to decisions in TransUnion; CREEC; Castillo; Castaneda; preparation of counter-points re same	Class Certification
4/30/2022	Mark Johnson	7.0	\$1,150	\$8,050	work on class cert reply papers and analysis, including Mastin Reply, further analysis of Anderson declaration, mtn to exclude portions of Anderson declaration;	Class Certification
4/30/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising GSL draft declaration	Class Certification
4/30/2022	Rachel Steyer	0.3	\$750	\$225	reviewing Anderson depo transcript to identify excerpted info as requested by GBW	Depositions
4/30/2022	Rachel Steyer	0.2	\$750	\$150	reviewing defendants' access expert's mark up of plaintiffs' barrier reports, adding to spreadsheet	Experts (Including Retention)
5/1/2022	Guy Wallace	3.9	\$1,350	\$5,265	review and analysis of Defendants' opposition; citations to record; preparation of detailed outline of reply brief re fact record	Class Certification
5/1/2022	Guy Wallace	2.8	\$1,350	\$3,780	review and analysis of Defendants' reply briefs re motions to strike P's experts	Other Motions
5/1/2022	Guy Wallace	1.4	\$1,350	\$1,890	review and analysis of Defendants' reply brief re motion to exclude Dr. Flores	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/1/2022	Mark Johnson	0.6	\$1,150	\$690	review and respond to GBW inquiry re D citation to Stiner depo testimony, review testimony and draft response	Class Certification
5/1/2022	Mark Johnson	6.7	\$1,150	\$7,705	Work on class cert reply papers and analysis, including Mastin reply declaration, analysis of brief; chart of D citations to Anderson and responses, research docs re BusFinders contracts and resident invoices; review and edit outline of brief from GBW; emails to COC re mtg to exclude expert opinions, work re resident invoices; analysis of Ds citation to records and emails re same	Class Certification
5/1/2022	Rachel Steyer	0.2	\$750	\$150	reviewing Anderson depo transcript to identify discussion requested by GBW	Depositions
5/1/2022	Rachel Steyer	1.1	\$750	\$825	reviewing defendants' access expert reports to tabulate barriers, compiling and updating spreadsheet	Experts (Including Retention)
5/2/2022	Guy Wallace	0.2	\$1,350	\$270	com's with RLS re preparation of reply declarations of putative class members	Class Certification
5/2/2022	Guy Wallace	0.6	\$1,350	\$810	analysis of whether CLRA class definition should be modified to exclude class members prior to Sept. 1, 2016	Class Certification
5/2/2022	Guy Wallace	0.5	\$1,350	\$675	review and analysis of further draft of Wallace Reply Declaration re class certification	Class Certification
5/2/2022	Guy Wallace	0.4	\$1,350	\$540	revise and edit letter to Defendants accusing P's counsel of unethical conduct	Communications With Opposing Counsel
5/2/2022	Guy Wallace	1.7	\$1,350	\$2,295	review and analysis of Defendants' reply re motion to exclude Dr. Kennedy	Other Motions
5/2/2022	Guy Wallace	1.7	\$1,350	\$2,295	review and analysis of Defendants' reply re motion to exclude Cross; com's with MTJ; TCC re same	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/2/2022	Guy Wallace	0.3	\$1,350	\$405	com's with TCC re Defendants' reply re the motion to exclude Cross; preparation of Cross Reply Declaration	Other Motions
5/2/2022	Mark Johnson	0.9	\$1,150	\$1,035	review new version of draft declaration of GBW iso class certification and comment on same.	Class Certification
5/2/2022	Mark Johnson	4.5	\$1,150	\$5,175	work on draft Mastin declaration	Class Certification
5/2/2022	Mark Johnson	2.0	\$1,150	\$2,300	work on class cert reply brief and evidence related tasks	Class Certification
5/2/2022	Mark Johnson	0.8	\$1,150	\$920	review and edit draft correspondence w/ OC from BBK re Rutner letter and resident depositions	Depositions
5/2/2022	Mark Johnson	2.0	\$1,150	\$2,300	work on outline of D expert opinions to be excluded	Other Motions
5/2/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising KGJ draft declaration	Class Certification
5/2/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising OJO draft declaration	Class Certification
5/2/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising KGJ draft declaration	Class Certification
5/2/2022	Rachel Steyer	0.4	\$750	\$300	communications on teams with TRB, KGJ, RVR, RDR, GSL, OJO, SLS concerning outreach efforts and declaration drafting	Class Outreach and Contact
5/2/2022	Rachel Steyer	0.2	\$750	\$150	response to MTJ, GBW, TCC, RBGG and co-counsel concerning reviewing invoice documents of declarants	Discovery (Non-Deposition)
5/2/2022	Rachel Steyer	0.6	\$750	\$450	reviewing and tabulating defendants' access expert Scotts Valley report	Experts (Including Retention)
5/2/2022	Rachel Steyer	0.5	\$750	\$375	reviewing defendants' access expert report of San Jose facility, tabulating and adding barriers to spreadsheet	Experts (Including Retention)
5/2/2022	Rachel Steyer	0.3	\$750	\$225	reviewing defendants' access report for San Jose facility, tabulating barriers	Experts (Including Retention)
5/2/2022	Rachel Steyer	0.5	\$750	\$375	reviewing defendants' access expert report for Tracy facility, tabulating barriers and adding to spreadsheet	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/2/2022	Rachel Steyer	1.0	\$750	\$750	reviewing defendants' access expert report of Redwood City facility, counting barriers and adding to/updating spreadsheet	Experts (Including Retention)
5/2/2022	Rachel Steyer	0.5	\$750	\$375	reviewing defendants' access expert report of Lodi facility, tabulating barriers and updating spreadsheet	Experts (Including Retention)
5/2/2022	Travis Close	1.4	\$850	\$1,190	Legal research re: ADA claims based on failure to have adequate emergency evacuation plans	Case Organization, Planning and Strategy
5/2/2022	Travis Close	1.9	\$850	\$1,615	Supplemental facility evacuation plans -- finish checking for BE.2 (locations of evacuation devices) and BE.4 (safe areas for residents who require assistance)	Case Organization, Planning and Strategy
5/2/2022	Travis Close	0.5	\$850	\$425	Analyze revisions to draft Ps' responses to Ds' interrogatories, with objections pertaining to June Kailes' notes	Discovery (Non-Deposition)
5/2/2022	Travis Close	1.5	\$850	\$1,275	Analyze evidence of Def's facility-based transportation policies in their opposition brief with respect to compliance with the fleet safety policy	Pleadings and Motions Re: Pleadings
5/2/2022	Travis Close	0.3	\$850	\$255	Call with GBW re: Cross's reply declaration	Pleadings and Motions Re: Pleadings
5/2/2022	Travis Close	1.3	\$850	\$1,105	Revisions to Cross, douglas reply dec outline	Pleadings and Motions Re: Pleadings
5/3/2022	Guy Wallace	1.8	\$1,350	\$2,430	review and analysis of draft of Wallace Reply Declaration re class certification	Class Certification
5/3/2022	Guy Wallace	1.2	\$1,350	\$1,620	zoom with GG; JY; BBK; AX; KS; EH; BU; MTJ; TCC; RLS re preparation of class cert reply papers	Class Certification
5/3/2022	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of Defendants' reply re motion to exclude Kailes and outline of draft Kailes Reply Declaration re MCC	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/3/2022	Guy Wallace	2.8	\$1,350	\$3,780	review and analysis of Defendants' reply briefs re motions to exclude Kailes; Cross; Flores; Kennedy; preparation of responsive points for reply declarations for MCC from experts	Other Motions
5/3/2022	Guy Wallace	0.7	\$1,350	\$945	review and analysis of D's reply brief re motion to exclude Mastin and Waters; preparation of email to MTJ re responsive points for reply Declaration re same	Other Motions
5/3/2022	Mark Johnson	1.4	\$1,150	\$1,610	zoom team mtg to discuss progress on class cert reply projects, reply declarations, exhibits to be included; mtn to exclude D expert opinions	Class Certification
5/3/2022	Mark Johnson	0.3	\$1,150	\$345	com w/ TCC re Cross and Kailes reply declarations, GBW reply declaration	Class Certification
5/3/2022	Mark Johnson	0.3	\$1,150	\$345	review status of uploaded reformatted site inspection reports; draft email to experts re data entry for same	Class Certification
5/3/2022	Mark Johnson	0.3	\$1,150	\$345	review invoice evidence from multiple facilities establishing common BSL address for receiving resident payments.	Class Certification
5/3/2022	Mark Johnson	0.1	\$1,150	\$115	review draft section for reply brief from AX re CLRA/UCL/Elder abuse standard for liability, estoppel argument	Class Certification
5/3/2022	Mark Johnson	7.5	\$1,150	\$8,625	research and drafting for Mastin reply declaration; com w/ GBW re same.	Class Certification
5/3/2022	Mark Johnson	0.6	\$1,150	\$690	review GBW notes re Ds reply briefs iso ecclsusion of expert testimony and identification of issues to address in reply declarations.	Other Motions
5/3/2022	Rachel Steyer	1.4	\$750	\$1,050	weekly meeting with TCC, GBW, MTJ and co-counsel to review and discuss assignments in preparation for reply brief filing	Case Organization, Planning and Strategy
5/3/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising DMS draft declaration	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/3/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising DMS draft declaration	Class Certification
5/3/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising DMS draft declaration	Class Certification
5/3/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising SLS draft declaration	Class Certification
5/3/2022	Rachel Steyer	0.6	\$750	\$450	reviewing edits in draft declarations from co-counsel BSU, updating drafts	Class Certification
5/3/2022	Rachel Steyer	0.3	\$750	\$225	reviewing OJO completed intake, evaluating for declaration	Class Outreach and Contact
5/3/2022	Rachel Steyer	0.2	\$750	\$150	searching through electronic production to find documents corresponding to likely declarant	Discovery (Non-Deposition)
5/3/2022	Rachel Steyer	0.3	\$750	\$225	completing review of defendants' access expert report of Lodi facility, tabulating barriers and updating spreadsheet	Experts (Including Retention)
5/3/2022	Rachel Steyer	1.3	\$750	\$975	reviewing defendants' access expert report for Santa Monica facility and tabulating barriers, updating spreadsheet	Experts (Including Retention)
5/3/2022	Travis Close	1.5	\$850	\$1,275	Team meeting with MTJ, RLS, GBW and co-counsel re: strategy for reply brief; expert declarations, motions to strike testimony, witness declarations, etc.	Case Organization, Planning and Strategy
5/3/2022	Travis Close	0.6	\$850	\$510	Revisions to Stacia Stiner deposition errata sheet	Depositions
5/3/2022	Travis Close	0.4	\$850	\$340	Communications with Stacia Stiner re: amended errata sheet for depo transcript	Depositions
5/3/2022	Travis Close	1.1	\$850	\$935	Review and analyze evidence that Disaster Manual/Emergency manual is available on BSL.net	Discovery (Non-Deposition)
5/3/2022	Travis Close	0.7	\$850	\$595	Meet with MTJ re: strategy for Kailes and Cross reply declarations	Pleadings and Motions Re: Pleadings
5/3/2022	Travis Close	1.7	\$850	\$1,445	Review comments by GBW for Kailes and Cross reply dec drafts and incorporate additions to their respective outlines	Pleadings and Motions Re: Pleadings
5/4/2022	Guy Wallace	1.4	\$1,350	\$1,890	revise and edit draft of Wallace Reply Declaration re MCC	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/4/2022	Guy Wallace	0.8	\$1,350	\$1,080	revise and edit detailed outline of class cert reply brief	Class Certification
5/4/2022	Guy Wallace	0.5	\$1,350	\$675	review and analysis of charts from JT re comparisons of ED actual hours vs. benchmark	Class Certification
5/4/2022	Guy Wallace	0.6	\$1,350	\$810	legal research and analysis re standards re readily achievable barrier removal and role of parent companies re same; com's with MTJ re same	Class Certification
5/4/2022	Guy Wallace	1.5	\$1,350	\$2,025	review and analysis of Mastin Reply Declaration; com's with MTJ re same	Class Certification
5/4/2022	Guy Wallace	1.2	\$1,350	\$1,620	com's with DTM; JT; BU; MTJ re preparation of class cert reply declarations of Dr. Flores; Schroyer; Dr. Jones; Dr. Belsen and analysis of Defendants' variation from benchmarks	Class Certification
5/4/2022	Guy Wallace	1.6	\$1,350	\$2,160	revise and edit draft of Mastin Reply Declaration re class cert; com's with MTJ re same	Class Certification
5/4/2022	Guy Wallace	1.4	\$1,350	\$1,890	preparation and drafting of MCC reply brief; statement of facts	Class Certification
5/4/2022	Mark Johnson	1.2	\$1,150	\$1,380	conference call w/ GBW, BU, JT, DM re mtns to exclude D expert testimony and decs in support of same; reply declarations of Schroyer, Flores, Belson, Jones, statistical analysis of alleged variation	Class Certification
5/4/2022	Mark Johnson	0.6	\$1,150	\$690	review most recent draft of GBW dec iso class cert	Class Certification
5/4/2022	Mark Johnson	0.5	\$1,150	\$575	review notes re opinions of Ds and mtn to exclude same for call w/ COC	Class Certification
5/4/2022	Mark Johnson	0.4	\$1,150	\$460	review email and spreadsheet from RLS re analysis of Anderson notations and mark-ups of expert reports.	Class Certification
5/4/2022	Mark Johnson	1.5	\$1,150	\$1,725	comparative review and analysis of Anderson Ex. 3 re construction dates with applicable codes, JM and GW construction history binders, Waters Ex. 12, Mastin reports with 1998 CBC	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/4/2022	Mark Johnson	0.3	\$1,150	\$345	emails exchanges w/ JY and J Mastin re clarification re 5 site inspection reports and construction dates/ applicable code sections	Class Certification
5/4/2022	Mark Johnson	0.4	\$1,150	\$460	calls w/ GBW re Mastin declaration, Waters reports, subsidiary relationships connections to licensees.	Class Certification
5/4/2022	Mark Johnson	0.4	\$1,150	\$460	review and incorporate edits to Mastin reply declaration; email to Mastin and Waters.	Class Certification
5/4/2022	Mark Johnson	0.2	\$1,150	\$230	review article and video re other litigation v Brookdale related to staffing issue sent by co-counsel	Class Certification
5/4/2022	Rachel Steyer	0.4	\$750	\$300	call with co-counsel BSU to review and discuss declaraiton edits	Class Certification
5/4/2022	Rachel Steyer	0.4	\$750	\$300	call with DMS to review and discuss draft declaration edits	Class Certification
5/4/2022	Rachel Steyer	1.0	\$750	\$750	call with declarant Karen Scarborough to review and discuss proposed changes to draft declaration	Class Certification
5/4/2022	Rachel Steyer	0.2	\$750	\$150	updating and revising declaration, email to TBS with address to prepare and mail to declarant	Class Certification
5/4/2022	Rachel Steyer	0.3	\$750	\$225	reviewing OJO intake and evaluating for declaration	Class Outreach and Contact
5/4/2022	Rachel Steyer	0.4	\$750	\$300	call with OJO to review and discuss questions about intake	Class Outreach and Contact
5/4/2022	Rachel Steyer	0.5	\$750	\$375	completing review and notations of defendants' access expert barrier reports, updating barriers spreadsheet	Experts (Including Retention)
5/4/2022	Rachel Steyer	0.2	\$750	\$150	email to GBW and MTJ describing barriers spreadsheet	Experts (Including Retention)
5/4/2022	Travis Close	1.8	\$850	\$1,530	Continue drafting June Kailes reply declaration (responding to Defendants' criticisms)	Case Organization, Planning and Strategy
5/4/2022	Travis Close	1.4	\$850	\$1,190	Continue drafting June Kailes reply declaration (results of supplemental form analysis)	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/4/2022	Travis Close	0.3	\$850	\$255	Emails to douglas cross re: updates to analysis/spreadsheet of fleet safety policy evidence; scheduling next call	Discovery (Non-Deposition)
5/4/2022	Travis Close	0.5	\$850	\$425	Call with Douglas Cross re: evidence relied upon for reply declaration	Experts (Including Retention)
5/4/2022	Travis Close	0.9	\$850	\$765	Leagl reseearch re: requirements for expert testimony concerning "knowledge and experience" v. methodology in reliability inquiry	Experts (Including Retention)
5/4/2022	Travis Close	2.2	\$850	\$1,870	Draft reply declaration for June Kails iso Ps' reply brief	Pleadings and Motions Re: Pleadings
5/4/2022	Travis Close	0.4	\$850	\$340	Review and analyze revised version of outline for reply brief by GBW	Pleadings and Motions Re: Pleadings
5/5/2022	Guy Wallace	2.7	\$1,350	\$3,645	preparation of class cert reply brief statement of facts; issues re operation and control; review and analysis of Bowman testimony re same from ADA depo	Class Certification
5/5/2022	Guy Wallace	4.9	\$1,350	\$6,615	preparation and drafting of class cert reply brief; statement of facts	Class Certification
5/5/2022	Guy Wallace	0.5	\$1,350	\$675	revise and edit draft of class cert reply declaration of Kailes	Class Certification
5/5/2022	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ re Waters facility reports and issue re items that were not measured and response thereto	Imported
5/5/2022	Mark Johnson	1.0	\$1,150	\$1,150	review and analyze Mastin and Waters site inspection reports for reply declarations	Class Certification
5/5/2022	Mark Johnson	1.1	\$1,150	\$1,265	per call w/ GBW, research Brookdale subsidiary information and compare with licensee / manager information from BKD; prepare supplemental spreadsheet re same.	Class Certification
5/5/2022	Mark Johnson	6.5	\$1,150	\$7,475	work on mtn to exclude expert opinions, including review ntoes, Saad depo transcript, Saad declaration	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/5/2022	Mark Johnson	1.5	\$1,150	\$1,725	further research and comparative analysis of BKD list of subsidiaries, licensees and management agreements; prepare documentation re same and email co-counsel re results.	Class Certification
5/5/2022	Mark Johnson	0.8	\$1,150	\$920	review ltr from OC Rutner re communications with resident declarants, depositions; com w/ GBW re same; draft proposed response	Discovery (Non-Deposition)
5/5/2022	Travis Close	1.1	\$850	\$935	Review and analyze depo transcript of Marjory Stitt for testimony re: Brookdale's emergency evac and accessible transportation policies	Depositions
5/5/2022	Travis Close	0.4	\$850	\$340	Analyze revised review notes by J.Kailes re: analysis of supplemental facility plans	Discovery (Non-Deposition)
5/5/2022	Travis Close	0.7	\$850	\$595	Analyze edits to draft Kailes reply dec by J.Kailes	Experts (Including Retention)
5/5/2022	Travis Close	1.9	\$850	\$1,615	Draft reply declaration of Douglas Cross (intro, evidence reviewed, evidence of FSP on BSL.net)	Experts (Including Retention)
5/5/2022	Travis Close	0.6	\$850	\$510	Analyze comments by GBW re: Def's reply iso mtn to exclude dec and testimony of Cross	Experts (Including Retention)
5/5/2022	Travis Close	0.7	\$850	\$595	Analyze comments by GBW re: Def's reply iso mtn to exclude dec and testimony of Kailes	Experts (Including Retention)
5/5/2022	Travis Close	0.3	\$850	\$255	Emails to GBW re: review of Cross and Kailes reply dec drafts	Experts (Including Retention)
5/5/2022	Travis Close	0.3	\$850	\$255	Email to Doug Cross re: draft of reply dec, scheduling next call, and strategy for next steps	Experts (Including Retention)
5/5/2022	Travis Close	1.8	\$850	\$1,530	Continue drafting Cross reply declaration (evidence of FSP implementation at facilities)	Pleadings and Motions Re: Pleadings
5/6/2022	Guy Wallace	3.4	\$1,350	\$4,590	preparation and drafting of class cert reply brief; statement of facts	Class Certification
5/6/2022	Guy Wallace	1.6	\$1,350	\$2,160	prepare for and participate in zoom with GG; JY; BBK; AX; KS; EH; BU; MTJ; TCC re preparation of class cert reply papers	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/6/2022	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of "supplemental" declaration of Saad; com's with MTJ re same	Other Motions
5/6/2022	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW re reply brief, status of expert reply declarations and communications with experts; mtn to exclude D expert testimony; review of LDR reports	Class Certification
5/6/2022	Mark Johnson	1.0	\$1,150	\$1,150	team zoom meeting on status and plans on all pieces of class cert reply brief, declarations, exhibits and motions to exclude expert testimony.	Class Certification
5/6/2022	Mark Johnson	0.5	\$1,150	\$575	call w/ GBW re Schroyer, Flores, Belson and Jones reply declarations; mtn to exclude D expert declarations and decs iso same; Saad supplemental declaration	Class Certification
5/6/2022	Mark Johnson	0.8	\$1,150	\$920	review and analyze supplemental declaration of Saad, email Marks, Thornton, Umpierre re same	Class Certification
5/6/2022	Mark Johnson	0.7	\$1,150	\$805	review complete set of potential invoice exhibits showing common mailing address for payment of fees; set up link and share with COC; draft email re same and summarizing content	Class Certification
5/6/2022	Mark Johnson	0.2	\$1,150	\$230	review potential exhibits re requests for capex approval and modifications to facilities.	Class Certification
5/6/2022	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re supp Saad dec contents and mtn to strike same	Class Certification
5/6/2022	Mark Johnson	0.2	\$1,150	\$230	review errata and correspondence from OC re depo testimony confidential designations, draft email re untimely nature of same..	Depositions
5/6/2022	Mark Johnson	0.7	\$1,150	\$805	review corres re new production of Operating plans, com w/ ESI staff re same, review subset of production, draft email to COC re same	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/6/2022	Mark Johnson	0.5	\$1,150	\$575	com w/ COC Yelin and Umpierre re mtn to exclude D expert opinions on mtn for class certification, review of LDR reports for variance explanations	Other Motions
5/6/2022	Mark Johnson	4.0	\$1,150	\$4,600	work on mtn to strike D expert opinions.	Other Motions
5/6/2022	Travis Close	0.4	\$850	\$340	Review and analyze letter from Def's re: happy camper declarations/depositons and our proposed response	Case Organization, Planning and Strategy
5/6/2022	Travis Close	1.0	\$850	\$850	Team meeting re: responding to Def's letter on resident declarations;	Case Organization, Planning and Strategy
5/6/2022	Travis Close	0.9	\$850	\$765	Legal research re other example of the applicability of ADA anti-discrimination provisions	Case Organization, Planning and Strategy
5/6/2022	Travis Close	2.1	\$850	\$1,785	Calls wtih june kailes re: revisions to reply declaration.	Experts (Including Retention)
5/6/2022	Travis Close	1.9	\$850	\$1,615	Draft list of evidence considered by Douglas Cross in forming opinions in reply declaration	Experts (Including Retention)
5/6/2022	Travis Close	0.4	\$850	\$340	Review and analyze supplemental declartion of Ali Saad submitted by Defs in support of their opposition to Ps' motion for class cert	Pleadings and Motions Re: Pleadings
5/6/2022	Travis Close	2.3	\$850	\$1,955	Further revisions to june kailes reply dec iso class cert	Pleadings and Motions Re: Pleadings
5/7/2022	Guy Wallace	1.1	\$1,350	\$1,485	revise and edit draft reply declaration of Kailes ISO class certification; com's with TCC re same	Class Certification
5/7/2022	Guy Wallace	1.6	\$1,350	\$2,160	preparation and drafting of class cert reply brief; statement of facts	Class Certification
5/7/2022	Mark Johnson	1.0	\$1,150	\$1,150	first review of draft of Jones reply declaration iso mtn for class certification; com w/ J Thorton re same	Class Certification
5/7/2022	Mark Johnson	0.7	\$1,150	\$805	review draft revised declaration of J Kailes and make edits, propose comments re same; review GBW edits,	Class Certification
5/7/2022	Mark Johnson	0.2	\$1,150	\$230	coms w/ GBW, DM, BU re Saad supp declaration;, strategy for addressing same.	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/7/2022	Mark Johnson	4.0	\$1,150	\$4,600	work on points and authorities to exclude D expert opinions re Anderson and Saad	Other Motions
5/8/2022	Guy Wallace	1.6	\$1,350	\$2,160	preparation and drafting of class cert reply brief	Class Certification
5/8/2022	Mark Johnson	0.6	\$1,150	\$690	calls w/ GBW re expert reports and mtns to exclude D expert testimony, briefing strategy and relative importance of data v other evidence of commonality on staffing claim	Class Certification
5/8/2022	Mark Johnson	0.2	\$1,150	\$230	review revisions to Kailes reply declaration and com w/ TCC re same	Class Certification
5/8/2022	Mark Johnson	0.1	\$1,150	\$115	review emails from TCC and KS re changes in D exhibit numbers and cross referencing.	Class Certification
5/8/2022	Mark Johnson	6.5	\$1,150	\$7,475	work on mtn to exclude expert testimony of Anderson, Saad	Other Motions
5/8/2022	Travis Close	0.6	\$850	\$510	Analysis of Def's changes to exhibit numbers in emergency evacuation section of their opposition brief	Case Organization, Planning and Strategy
5/8/2022	Travis Close	0.3	\$850	\$255	Email to team re: changes to exhibit numbers in Def's refiled opposition brief	Case Organization, Planning and Strategy
5/8/2022	Travis Close	1.5	\$850	\$1,275	Create list of documents and evidence considered by june Kailes for reply declaration	Experts (Including Retention)
5/8/2022	Travis Close	1.4	\$850	\$1,190	Addressing comments by GBW and MTJ in draft kailes reply declaration	Pleadings and Motions Re: Pleadings
5/8/2022	Travis Close	1.2	\$850	\$1,020	Further revisions to Kailes reply declaration iso Ps' motion for class cert	Pleadings and Motions Re: Pleadings
5/9/2022	Guy Wallace	5.2	\$1,350	\$7,020	preparation and drafting of class cert reply brief	Class Certification
5/9/2022	Guy Wallace	1.3	\$1,350	\$1,755	com's with Waters; Mastin; MTJ; TCC re class cert reply declarations	Class Certification
5/9/2022	Mark Johnson	0.4	\$1,150	\$460	develop and circulate draft agenda for call with access experts	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/9/2022	Mark Johnson	1.2	\$1,150	\$1,380	call w/ GBW, TCC, Mastin, Waters to discuss revised reports, expert reply declarations, issues raised by D's access expert.	Class Certification
5/9/2022	Mark Johnson	0.6	\$1,150	\$690	research re REIT and establishing BSL is not a REIT, review other web-based docs re BSL control, operation of facilities.	Class Certification
5/9/2022	Mark Johnson	0.5	\$1,150	\$575	calls (x2) w/ GBW re expert declarations, reply brief, GBW declaration iso same.	Class Certification
5/9/2022	Mark Johnson	0.2	\$1,150	\$230	review doc produced by DSS and coms w/ COC re same	Class Certification
5/9/2022	Mark Johnson	5.0	\$1,150	\$5,750	work on mtn to exclude D expert declarations.	Other Motions
5/9/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising GSL draft declaration	Class Certification
5/9/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising DMS draft declaration	Class Certification
5/9/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising OJO draft declaration	Class Certification
5/9/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising SLS draft declaration	Class Certification
5/9/2022	Rachel Steyer	0.2	\$750	\$150	reviewing DMS proposed edits to declaration, incorporating, email to TBS, DMS, LEC regarding preparing and resending declaration for signature	Class Certification
5/9/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising OJO draft declaration	Class Certification
5/9/2022	Rachel Steyer	0.5	\$750	\$375	conducted final read through call with declarant	Class Certification
5/9/2022	Rachel Steyer	0.2	\$750	\$150	call with DMS to discuss proposed edits and revisions after read through call with declarant	Class Certification
5/9/2022	Rachel Steyer	0.2	\$750	\$150	reviewing and editing DMS draft declaration following read through with proposed changes	Class Certification
5/9/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising OJO draft declaration	Class Certification
5/9/2022	Rachel Steyer	0.4	\$750	\$300	updating and drafting RLS reply declaration ISO motion for class certification	Class Certification
5/9/2022	Rachel Steyer	0.2	\$750	\$150	call with OJO to review and discuss status of draft declarations and intakes	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/9/2022	Rachel Steyer	0.4	\$750	\$300	call with DMS to review and discuss status of pending declarations and intakes	Class Outreach and Contact
5/9/2022	Rachel Steyer	0.3	\$750	\$225	communications on teams with OJO, DMS, KGJ, GSL, SLS concerning class outreach, intakes, and decalration drafting efforts	Class Outreach and Contact
5/9/2022	Rachel Steyer	0.2	\$750	\$150	reviewing letter and communications with opposing counsel concerning alleged improper communications with noticed deponents	Communications With Opposing Counsel
5/9/2022	Rachel Steyer	0.4	\$750	\$300	reviewing electronic production for documents corresponding to potential declarants	Discovery (Non-Deposition)
5/9/2022	Travis Close	1.4	\$850	\$1,190	Revisions to Douglas Cross declaration (re: BSL.net access to all policies)	Case Organization, Planning and Strategy
5/9/2022	Travis Close	0.5	\$850	\$425	Research on whether Brookdale is a REIT (SEC filings, dividends, etc)	Case Organization, Planning and Strategy
5/9/2022	Travis Close	1.4	\$850	\$1,190	Review and analyze depo testimony of EDs Harris, Ataeian, Buot, Ward re: fleet safety policy and BSL.net	Depositions
5/9/2022	Travis Close	0.8	\$850	\$680	Review and analyze most recent productions by Cal DSS, central applications bureau, re: Brookdale's plans of operation	Discovery (Non-Deposition)
5/9/2022	Travis Close	0.9	\$850	\$765	Analyze and download all signed copies of Acknowledgement Form for Fleet Safety Policy	Discovery (Non-Deposition)
5/9/2022	Travis Close	0.3	\$850	\$255	Email to Doug cross re: revisions to reply declaration and availability for next call	Experts (Including Retention)
5/9/2022	Travis Close	0.4	\$850	\$340	Email to GW re: construction history dates for facilities inspected	Experts (Including Retention)
5/9/2022	Travis Close	0.7	\$850	\$595	Review and analyze revisions by Cross to Cross reply declaration	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/9/2022	Travis Close	1.3	\$850	\$1,105	Meeting with GBW, MTJ, and architects jeff mastin and gary waters re: revisions to draft reply declarations	Pleadings and Motions Re: Pleadings
5/10/2022	Guy Wallace	5.8	\$1,350	\$7,830	preparation and drafting of class cert reply brief	Class Certification
5/10/2022	Guy Wallace	0.6	\$1,350	\$810	prepare for and participate in zoom with PK; LP; MTJ; TCC re class cert reply declaration	Class Certification
5/10/2022	Guy Wallace	0.8	\$1,350	\$1,080	legal research and analysis re Hinojos and Kwikset and the concept of the "benefit of the bargain" as a defense to liability or damages under the CLRA	Class Certification
5/10/2022	Guy Wallace	0.9	\$1,350	\$1,215	prepare for and participate in zoom with GCG; JY; BBK; AX; KS; EH; BU; MTJ; TCC; RLS re preparation of reply papers re class certification	Class Certification
5/10/2022	Guy Wallace	0.5	\$1,350	\$675	legal research and analysis re Disability Rights Action Committee decision from Ninth Circuit and application of ADA to third party entities despite agreements re operations of facilities	Class Certification
5/10/2022	Mark Johnson	0.6	\$1,150	\$690	conference call w/ GBW, TCC, P Kennedy, L Pettite re reply dec of PK iso class certification, issues to be addressed in same; com w/ GBW before call for prep	Class Certification
5/10/2022	Mark Johnson	0.9	\$1,150	\$1,035	prepare for and participate in zoom team call w GBW, GCG, AX, RLS, JY, TCC, BBK, KS, BU re status of briefing, GBW declaration, BBK declaration as DSS citations, expert reply declarations, mtn to exclude D expert declarations, expert revised access reports.	Class Certification
5/10/2022	Mark Johnson	0.8	\$1,150	\$920	review samples of first batch of revised expert access reports, email to COC re same	Class Certification
5/10/2022	Mark Johnson	0.3	\$1,150	\$345	coms w/ G Waters, TCC re 1992 CBC for revised access reports; research re availability of same.	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/10/2022	Mark Johnson	0.2	\$1,150	\$230	draft email to G Waters re review of reports, approach to addressing readily achievable barrier removal	Class Certification
5/10/2022	Mark Johnson	1.0	\$1,150	\$1,150	prepare for and participate in video conference w/ GBW, BU, J Thornton, D Marks re outline of Flores reply declaration, Belson and Jones reply declarations, mtn to exclude D expert opinions and data issues related to same	Class Certification
5/10/2022	Mark Johnson	0.8	\$1,150	\$920	draft email response to DSS counsel for CAB re timing for production of docs responsive to subpoena, clarification re production of document v declaration of no docs, narrowing scope of production; review subpoena, prior correspondence and produced docs for same	Discovery (Non-Deposition)
5/10/2022	Mark Johnson	0.7	\$1,150	\$805	draft emails x 2 to OC re position on confidentiality designations for depo testimony; untimely filing of Saad supplemental declaration. review PO and past correspondence for same	Discovery (Non-Deposition)
5/10/2022	Mark Johnson	4.8	\$1,150	\$5,520	work on mtn to exclude D's expert opinions	Other Motions
5/10/2022	Rachel Steyer	0.9	\$750	\$675	weekly meeting internally and with RBGG co-counsel and BSU to review and discuss list of assignments in preparation for reply motion filing	Case Organization, Planning and Strategy
5/10/2022	Rachel Steyer	0.3	\$750	\$225	call with BSU to review and discuss draft declaration	Class Certification
5/10/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising GSL draft declaration	Class Certification
5/10/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising GSL draft declaration	Class Certification
5/10/2022	Rachel Steyer	0.2	\$750	\$150	email to GBW, MTJ, BSU with revised declaration	Class Certification
5/10/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising SLS draft declaration	Class Certification
5/10/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising DMS draft declaration	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/10/2022	Rachel Steyer	0.2	\$750	\$150	reviewing and editing DMS draft declaration	Class Certification
5/10/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising OJO draft declaration	Class Certification
5/10/2022	Rachel Steyer	0.2	\$750	\$150	reviewing and editing draft DMS email to declarants for authorization docs	Class Outreach and Contact
5/10/2022	Rachel Steyer	0.3	\$750	\$225	call with class member declarant to discuss status of declaration	Class Outreach and Contact
5/10/2022	Rachel Steyer	0.2	\$750	\$150	call with brother of putative class member declarant to discuss status of declaration	Class Outreach and Contact
5/10/2022	Rachel Steyer	0.3	\$750	\$225	communications on teams with DMS, OJO, GSL concerning outreach and declaration drafting	Class Outreach and Contact
5/10/2022	Travis Close	0.4	\$850	\$340	Meet with RLS re: assignments for our reply motion	Case Organization, Planning and Strategy
5/10/2022	Travis Close	0.9	\$850	\$765	Team meeting with MTJ, GBW, and co-counsel re: updates to architect's reports; kailes and Cross declarations; staffing experts; motions to strike; and other work for reply brief	Case Organization, Planning and Strategy
5/10/2022	Travis Close	0.4	\$850	\$340	Review and analyze updated Cal DSS facility evaluation reports and complaint investigation reports for lodi, san marcos, sterling court, and auburn facilities	Discovery (Non-Deposition)
5/10/2022	Travis Close	0.3	\$850	\$255	Email to douglas cross re: further revisions to reply brief	Experts (Including Retention)
5/10/2022	Travis Close	0.8	\$850	\$680	Review and analyze first nine (revised) reports of jeff mastin for any major errors	Experts (Including Retention)
5/10/2022	Travis Close	0.2	\$850	\$170	Email to gary waters re: 1982 CBC and where to find it	Experts (Including Retention)
5/10/2022	Travis Close	1.7	\$850	\$1,445	Call with douglas cross re: going over revisions to his reply declaration	Experts (Including Retention)
5/10/2022	Travis Close	0.5	\$850	\$425	Meeting with MTJ, GBW, patrick kennedy re: revisions to damages analysis	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/10/2022	Travis Close	0.6	\$850	\$510	Review and analyze further revisions to reply brief of douglas cross	Pleadings and Motions Re: Pleadings
5/10/2022	Travis Close	1.1	\$850	\$935	Review and analyze updated GBW declaration with evidence supporting brookdale's corporate control	Pleadings and Motions Re: Pleadings
5/11/2022	Guy Wallace	5.2	\$1,350	\$7,020	preparation and drafting of reply brief re class certification	Class Certification
5/11/2022	Guy Wallace	1.1	\$1,350	\$1,485	prepare for and participate in zoom with DTM; JT; BU; MTJ re preparation of class cert reply papers	Class Certification
5/11/2022	Guy Wallace	2.1	\$1,350	\$2,835	preparation and drafting of reply brief re class certification; first proposed ADA class	Class Certification
5/11/2022	Mark Johnson	1.0	\$1,150	\$1,150	prepare for and participate in video conference w/ GBW, BU, J Thornton and D Marks re outline of reply declaration of Dr. Flores, reply declarations of Belson and Jones and Schroyer, mtn to exclude D expert opinions and data issues related to same.	Class Certification
5/11/2022	Mark Johnson	0.4	\$1,150	\$460	email exchange w DM re demand for info re expert Jacobson compensation; review depo transcript re same and draft proposed email to OC for DM review.	Class Certification
5/11/2022	Mark Johnson	0.2	\$1,150	\$230	com w/ AX re verification of supp rog responses for exhibit to GBW declawration, search for and send same	Class Certification
5/11/2022	Mark Johnson	0.2	\$1,150	\$230	email coms /w DM, JT and BBK re Flores reply declaration on issue of DSS complaints	Class Certification
5/11/2022	Mark Johnson	2.4	\$1,150	\$2,760	draft mtn to strike supplemental Saad declartion, legal and factual research for same	Other Motions
5/11/2022	Mark Johnson	0.6	\$1,150	\$690	call w/ BU re strategy for filing mtn to exclude D expert opinions, structure and content of brief, timing issues, supporting declarations	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/11/2022	Mark Johnson	1.3	\$1,150	\$1,495	incorporate edits from BBK to mtn to strike supplemental Saad declaration and finalize; draft declaration in support of same; com w BBD and other COC re same	Other Motions
5/11/2022	Mark Johnson	0.3	\$1,150	\$345	email and calls (x2) w GBW re mtn to exclude opinions of D experts	Other Motions
5/11/2022	Mark Johnson	3.3	\$1,150	\$3,795	complete draft of mtn to exclude D expert opinions and circulate to COC; draft cover email with commentary	Other Motions
5/11/2022	Mark Johnson	0.2	\$1,150	\$230	emails w/ COC at RBGG and BU re pieces of mtn to exclude expert opinions and assignments of same	Other Motions
5/11/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising DMS draft declaration	Class Certification
5/11/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising DMS draft declaration	Class Certification
5/11/2022	Rachel Steyer	0.7	\$750	\$525	editing and revising draft declaration following comments from declarant	Class Certification
5/11/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising GSL draft declaration	Class Certification
5/11/2022	Rachel Steyer	0.3	\$750	\$225	reviewing BSU edits to DMS draft declaration, adding notes for guidance, incorporating changes, sending to DMS	Class Certification
5/11/2022	Rachel Steyer	0.3	\$750	\$225	call with GBW to review and discuss question about draft declaration, discussed other assignments for class cert	Class Certification
5/11/2022	Rachel Steyer	0.2	\$750	\$150	reviewing and updating GSL draft declaration, checking electronic production for documents	Class Certification
5/11/2022	Rachel Steyer	0.3	\$750	\$225	reviewing and incorporating BSU edits into GSL and DMS draft declarations, sending to both	Class Certification
5/11/2022	Rachel Steyer	0.2	\$750	\$150	review of Barry Shapiro declaration and email response	Class Certification
5/11/2022	Rachel Steyer	1.8	\$750	\$1,350	revising RLS draft declaration ISO class cert (reply brief), updating appendix of declarations	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/11/2022	Rachel Steyer	0.2	\$750	\$150	returned missed call with class member resident, ready to proceed forward with setting up and conducting intake	Class Outreach and Contact
5/11/2022	Rachel Steyer	0.3	\$750	\$225	communications on teams with SLS, DMS, GSL, KGJ concerning intakes and declaration drafting	Class Outreach and Contact
5/11/2022	Travis Close	1.1	\$850	\$935	Review and analyze 1992 CBC scanned and produced by the Witkin Law Library for info re: accessibility provisions	Discovery (Non-Deposition)
5/11/2022	Travis Close	0.2	\$850	\$170	email to team re: 1992 CBC, accessibility section	Discovery (Non-Deposition)
5/11/2022	Travis Close	0.9	\$850	\$765	Legal research re: whether experts are required to read other experts' declarations in forming opinions	Discovery (Non-Deposition)
5/11/2022	Travis Close	0.3	\$850	\$255	Email to douglas cross re: update on next version of reply declaration	Experts (Including Retention)
5/11/2022	Travis Close	0.3	\$850	\$255	Email to gary waters re: reports shared with architects last week for review	Experts (Including Retention)
5/11/2022	Travis Close	1.3	\$850	\$1,105	Legal research re: whether Dr Saad has opined about med model studies in other cases	Experts (Including Retention)
5/11/2022	Travis Close	1.6	\$850	\$1,360	Revisions to list of evidence considered in Kailes reply declaration	Pleadings and Motions Re: Pleadings
5/11/2022	Travis Close	1.1	\$850	\$935	Review and analyze draft motion to exclude certain testimony and opinions of Ds' experts	Pleadings and Motions Re: Pleadings
5/11/2022	Travis Close	0.2	\$850	\$170	Review and analyze revisions by co-counsel to motion to exclude testimony of Defendants' experts	Pleadings and Motions Re: Pleadings
5/12/2022	Guy Wallace	4.1	\$1,350	\$5,535	preparation and drafting of class certification reply brief	Class Certification
5/12/2022	Guy Wallace	0.9	\$1,350	\$1,215	legal research and analysis re district court's discretion to certify subclasses	Class Certification
5/12/2022	Guy Wallace	4.6	\$1,350	\$6,210	preparation and drafting of Plaintiffs' reply re class certification; ADA claims	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/12/2022	Mark Johnson	3.0	\$1,150	\$3,450	work on revisions to Mastin / Waters Reply declaration	Class Certification
5/12/2022	Mark Johnson	0.5	\$1,150	\$575	draft proposed order for mtn to strike supplemental Saad expert report	Other Motions
5/12/2022	Rachel Steyer	0.5	\$750	\$375	reviewing and editing GSL draft declaration	Class Certification
5/12/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising DMS draft declaration	Class Certification
5/12/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising KGJ draft declaration	Class Certification
5/12/2022	Rachel Steyer	0.2	\$750	\$150	call with BSU to review and discuss questions about draft declaration and comments	Class Certification
5/12/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising GSL draft declaration with BSU edits	Class Certification
5/12/2022	Rachel Steyer	0.2	\$750	\$150	email to DMS with comments and instructions about edits to draft declarations	Class Certification
5/12/2022	Rachel Steyer	0.3	\$750	\$225	call with class member declarant to clarify last minute changes to declaration, resent for signature	Class Certification
5/12/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising SLS draft declaration	Class Certification
5/12/2022	Rachel Steyer	0.4	\$750	\$300	editing and revising OJO draft declaration	Class Certification
5/12/2022	Rachel Steyer	2.1	\$750	\$1,575	editing and working on RLS declaration and appendix/tables ISO class cert	Class Certification
5/12/2022	Rachel Steyer	0.4	\$750	\$300	call with family member of current resident to discuss case	Class Outreach and Contact
5/12/2022	Rachel Steyer	0.2	\$750	\$150	call with DMS to review and discuss status of intakes and declarations and communications with class members	Class Outreach and Contact
5/12/2022	Rachel Steyer	0.3	\$750	\$225	communications on teams with SLS, KGJ, GSL, DMS, OJO concerning class outreach and declaration drafting question	Class Outreach and Contact
5/12/2022	Travis Close	1.2	\$850	\$1,020	Legal research re: cases in which expert testimony has opined about legality of DOT regulations implementing the ADA	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/12/2022	Travis Close	1.5	\$850	\$1,275	Call with Douglas cross re: revisions to reply declaration	Experts (Including Retention)
5/12/2022	Travis Close	0.9	\$850	\$765	Further changes to Exhibit B in doug cross reply brief iso class cert	Experts (Including Retention)
5/12/2022	Travis Close	0.5	\$850	\$425	Review and analyze draft section of reply brief on residents with mobility or vision disabilities	Pleadings and Motions Re: Pleadings
5/13/2022	Guy Wallace	7.2	\$1,350	\$9,720	preparation and drafting of class cert reply brief; ADA class	Class Certification
5/13/2022	Guy Wallace	1.4	\$1,350	\$1,890	prepare for and participate in zoom with GCG; JY; AX; KS; EH; DTM; BU; MTJ; TCC; RLS re preparation of class cert reply	Class Certification
5/13/2022	Guy Wallace	2.6	\$1,350	\$3,510	preparation and drafting of class cert reply brief; second proposed class re reasonable modification in policy	Class Certification
5/13/2022	Guy Wallace	0.3	\$1,350	\$405	com's with Waters; MTJ re preparation of Waters reply declaration and facility reports	Experts (Including Retention)
5/13/2022	Mark Johnson	1.1	\$1,150	\$1,265	zoom team mtg w/ GBW, TCC, RLS, GCG, JY AX, BKK, EH, KS, BU re status and strategy for class cert reply tasks, including brief, GBW declaration, expert declarations, BBK declaration, exhibits, sealing issues,	Class Certification
5/13/2022	Mark Johnson	1.6	\$1,150	\$1,840	review and edit BBK declaration re D resident declarants and depositions and DDS citations	Class Certification
5/13/2022	Mark Johnson	1.5	\$1,150	\$1,725	research doc mgmt system and depo exhibits for docs re trigger hours above/below benchmark for action plan, manual for DDOs re labor detail reports, request for reasonable accommodation form.	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/13/2022	Mark Johnson	0.3	\$1,150	\$345	calls x2 w/ GBW re federal guidance on ADA coverage, arguments re 2nd class and reasonable accommodations issues/evidence	Class Certification
5/13/2022	Mark Johnson	2.4	\$1,150	\$2,760	work on revisions and additions to Mastin / Waters declarations	Class Certification
5/13/2022	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW, BU re status of analysis of variance corrections from LDR, status and content of Flores declaration	Class Certification
5/13/2022	Mark Johnson	0.3	\$1,150	\$345	review and analyze D's supplemental responses to rogs re bank accounts	Discovery (Non-Deposition)
5/13/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising OJO draft declaration	Class Certification
5/13/2022	Rachel Steyer	0.2	\$750	\$150	call with KGJ to discuss assistance with preparing exhibit cover sheets and updating appendix	Class Certification
5/13/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising OJO draft declaration	Class Certification
5/13/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising OJO draft declaration	Class Certification
5/13/2022	Rachel Steyer	0.2	\$750	\$150	reviewing BSU edits to OJO draft declaration and incorporating, sending to OJO with instructions to conduct read through	Class Certification
5/13/2022	Rachel Steyer	1.2	\$750	\$900	weekly meeting with GBW, TCC, MTJ and RBGG co-counsel to review and discuss tasks and assignments and in preparation for reply brief filing	Class Certification
5/13/2022	Rachel Steyer	1.1	\$750	\$825	updating and revising declaration tables and draft RLS declaration	Class Certification
5/13/2022	Rachel Steyer	0.2	\$750	\$150	response to GSL concerning email to send to family member answering question	Class Outreach and Contact
5/13/2022	Rachel Steyer	0.5	\$750	\$375	call with declarant to review and finalize declaration for signature	Class Outreach and Contact
5/13/2022	Rachel Steyer	0.7	\$750	\$525	communications on teams with GSL, SLS, OJO, DMS, KGJ concerning outreach, intakes, and gathering and finalizing declarations for signature	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/13/2022	Rachel Steyer	0.2	\$750	\$150	reviewing production to try to locate fees for likely declarant	Discovery (Non-Deposition)
5/13/2022	Travis Close	0.2	\$850	\$170	Email to AXU re: signed acknowledgement forms for GBW declaraiton	Case Organization, Planning and Strategy
5/13/2022	Travis Close	1.1	\$850	\$935	Meeting with GBW, MTJ, RLS & co-counsel re: organizing filings for reply brief, issues with exhibits, expert declarations, etc	Case Organization, Planning and Strategy
5/13/2022	Travis Close	0.4	\$850	\$340	Email to JLS, KS re: changes to exhibits in Def's corrected opposition motion	Case Organization, Planning and Strategy
5/13/2022	Travis Close	0.8	\$850	\$680	Further review of signed acknowledgement forms demonstrating implementation of the FSP at brookdale facilities	Discovery (Non-Deposition)
5/13/2022	Travis Close	0.5	\$850	\$425	Review and analyze latest revisions to cross declaration	Pleadings and Motions Re: Pleadings
5/13/2022	Travis Close	1.2	\$850	\$1,020	Further revisions to declaration of doug cross iso reply to class cert	Pleadings and Motions Re: Pleadings
5/13/2022	Travis Close	0.4	\$850	\$340	Meet w/ LEC re: assignments for next week's filings	Pleadings and Motions Re: Pleadings
5/13/2022	Travis Close	1.2	\$850	\$1,020	Analysis of changes to exhibit numbers in Def's newly filed (Dkt 441) opposition motion	Pleadings and Motions Re: Pleadings
5/13/2022	Travis Close	1.3	\$850	\$1,105	Additional revisions to Douglas Cross reply declaration; finalize and send to GBW for review	Pleadings and Motions Re: Pleadings
5/14/2022	Guy Wallace	3.4	\$1,350	\$4,590	preparation and drafting of class cert reply brief	Class Certification
5/14/2022	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of deposition testimony cited by Defendants' in opposition brief; com's with MTJ; JY re same; preparation of reply points re same	Class Certification
5/14/2022	Mark Johnson	2.5	\$1,150	\$2,875	continue working on Mastin / Waters reply declaration; reviewing materials for same	Class Certification
5/14/2022	Mark Johnson	2.0	\$1,150	\$2,300	track down citations to record from D and prepare memo re same for GBW and reply brief	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/14/2022	Mark Johnson	0.4	\$1,150	\$460	zoom call w/ JY, GCG re excerpts from Baier book and inclusion in evidence as exhibit to GBW declaration	Class Certification
5/14/2022	Mark Johnson	0.4	\$1,150	\$460	calls and emails w/ GBW re class cert reply brief arguments and evidence re enforcement of benchmarks	Class Certification
5/14/2022	Mark Johnson	2.0	\$1,150	\$2,300	work on Mastin / Waters reply declaration	Class Certification
5/14/2022	Mark Johnson	1.7	\$1,150	\$1,955	review depo testimony and documents re enforcement of benchmarks and SA, prepare compilation of same and send to GBW for review for class cert reply brief.	Class Certification
5/14/2022	Mark Johnson	0.2	\$1,150	\$230	email exchanges w/ JY re potential discrepancies in Mastin and Waters revised reports.	Class Certification
5/14/2022	Mark Johnson	0.2	\$1,150	\$230	email from / to AX re CCRCs and potential exhibits re same for GBW reply dec iso class certification/ review exhibits re same.	Class Certification
5/14/2022	Rachel Steyer	0.4	\$750	\$300	working on RLS draft declaration ISO reply for class cert, updating tables and declaration appendix	Class Certification
5/15/2022	Guy Wallace	10.2	\$1,350	\$13,770	preparation and drafting of class cert reply brief; third proposed class	Class Certification
5/15/2022	Guy Wallace	2.3	\$1,350	\$3,105	preparation and drafting of class cert reply brief; sections re (b)(2) class; superiority; manageability; damages	Class Certification
5/15/2022	Guy Wallace	1.6	\$1,350	\$2,160	preparation and drafting of class cert reply brief	Class Certification
5/15/2022	Mark Johnson	9.0	\$1,150	\$10,350	work on class cert reply papers - declarations of Waters and Mastin	Class Certification
5/15/2022	Mark Johnson	0.3	\$1,150	\$345	coms w/ COC re Mastin / Waters revised reports, Baier video, other evidence iso reply	Class Certification
5/15/2022	Rachel Steyer	0.2	\$750	\$150	searching case cited by defendants as requested by GBW	Misc. Research

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/16/2022	Guy Wallace	5.6	\$1,350	\$7,560	preparation and drafting of reply brief re class certification	Class Certification
5/16/2022	Guy Wallace	1.2	\$1,350	\$1,620	prepare for and participate in team zoom with GCG; JY; BBK; AX; KS; BU; MTJ; TCC; RLS	Class Certification
5/16/2022	Guy Wallace	1.5	\$1,350	\$2,025	revise and edit draft reply declaration of Cross re motion for class certification; com's with TCC re same	Class Certification
5/16/2022	Guy Wallace	0.5	\$1,350	\$675	review and analysis of draft of reply declaration of Dr. Flores re class certification; com's with BU re same	Class Certification
5/16/2022	Guy Wallace	0.5	\$1,350	\$675	review and analysis of draft reply declaration of BBK re class certification; com's with BBK re same	Class Certification
5/16/2022	Guy Wallace	1.7	\$1,350	\$2,295	review and analysis of draft reply declarations of Dr. Jones; GBW	Class Certification
5/16/2022	Mark Johnson	1.3	\$1,150	\$1,495	participate in team Zoom conference re status of brief, declarations, exhibits, mtn to exclude and all docs for filing of Thursday reply.	Class Certification
5/16/2022	Mark Johnson	0.5	\$1,150	\$575	call w/ J Mastin re technical issues related to Reply declarations	Class Certification
5/16/2022	Mark Johnson	3.8	\$1,150	\$4,370	complete revisions to Mastin reply declaration / template and circulate with cover email and explanations.	Class Certification
5/16/2022	Mark Johnson	1.2	\$1,150	\$1,380	multiple email exchanges w/ co-counsel JY and Mastin / Waters re issues with revised expert reports and finalizing same, Mastin / Waters declarations	Class Certification
5/16/2022	Mark Johnson	2.2	\$1,150	\$2,530	review drafts of brief, Belson and Jones declaration, latest draft of mtn to exclude expert testimony from COC, Cross dec & edits from GBW	Class Certification
5/16/2022	Mark Johnson	3.5	\$1,150	\$4,025	work on Waters reply declaration	Class Certification
5/16/2022	Mark Johnson	0.4	\$1,150	\$460	call w/ COC BU re revisions to latest draft of mtn to exclude expert testimony.	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/16/2022	Mark Johnson	1.7	\$1,150	\$1,955	work on revised version of mtn to exclude D expert opinions	Other Motions
5/16/2022	Rachel Steyer	1.2	\$750	\$900	team meeting with GBW, TCC, MTJ and BSU and BRGG co-counsel to review and discuss reply brief ISO class cert filing checklist	Case Organization, Planning and Strategy
5/16/2022	Rachel Steyer	0.3	\$750	\$225	email to GBW, TCC, MTJ circulating copy of draft declaration, appendix, and tables	Class Certification
5/16/2022	Rachel Steyer	0.2	\$750	\$150	call with KGJ to review and discuss working on updating exhibit cover pages, updating declaration appendix	Class Certification
5/16/2022	Rachel Steyer	0.3	\$750	\$225	revising OJO draft declaration based on edits from declarant	Class Certification
5/16/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising GSL draft declaration	Class Certification
5/16/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising GSL draft declaration	Class Certification
5/16/2022	Rachel Steyer	0.3	\$750	\$225	editing and revising OJO draft declaration	Class Certification
5/16/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising SLS draft declaration	Class Certification
5/16/2022	Rachel Steyer	0.3	\$750	\$225	call with OJO to review and discuss draft declaration	Class Certification
5/16/2022	Rachel Steyer	0.3	\$750	\$225	reviewing and updating declaration tables	Class Certification
5/16/2022	Rachel Steyer	0.5	\$750	\$375	call with TRB to review and discuss status of declarations and outstanding outreach efforts	Class Outreach and Contact
5/16/2022	Rachel Steyer	0.2	\$750	\$150	discussion with class member declarant about re-signing declaration, reviewing named plaintiff vs. declarant distinctions	Class Outreach and Contact
5/16/2022	Travis Close	1.2	\$850	\$1,020	Team meeting re reply brief draft; expert declaration filings and revised reports; motions to exclude	Case Organization, Planning and Strategy
5/16/2022	Travis Close	0.2	\$850	\$170	Review and analyze updated filing checklist for class cert reply	Case Organization, Planning and Strategy
5/16/2022	Travis Close	1.2	\$850	\$1,020	Review and analyze draft jeff mastin reply declaration iso class cert	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/16/2022	Travis Close	0.4	\$850	\$340	Email to JY (co-counsel) responding to points about evidence required to be filed under seal and missed citations in June Kailes declaration	Pleadings and Motions Re: Pleadings
5/16/2022	Travis Close	1.1	\$850	\$935	Organize docs cited by June Kailes in her reply declaration and send to co-counsel	Pleadings and Motions Re: Pleadings
5/16/2022	Travis Close	1.2	\$850	\$1,020	Revisions to latest draft of doug cross reply declaration	Pleadings and Motions Re: Pleadings
5/17/2022	Guy Wallace	0.6	\$1,350	\$810	review and analysis of draft reply declarations of Dr. Jones and Dr. Belson re class certification; com's with DTM; JT; BU and MTJ re same	Class Certification
5/17/2022	Guy Wallace	1.8	\$1,350	\$2,430	review and analysis of further draft of GBW reply declaration re class certification	Class Certification
5/17/2022	Guy Wallace	0.5	\$1,350	\$675	revise and edit draft reply declaration of RLS re class certification; com's with RLS; MTJ re same	Class Certification
5/17/2022	Guy Wallace	0.4	\$1,350	\$540	review and analysis of Ninth Circuit's decision in Lara	Class Certification
5/17/2022	Guy Wallace	0.8	\$1,350	\$1,080	com's with JGT; MTJ re Dr. Jones' reply declaration and analysis of alleged variation between Brookdale facilities	Class Certification
5/17/2022	Guy Wallace	5.1	\$1,350	\$6,885	preparation and drafting of class cert reply brief	Class Certification
5/17/2022	Guy Wallace	0.8	\$1,350	\$1,080	team zoom with GCG; JY; BBK; AX; KS; BU; MTJ; TCC; RLS re preparation of class certification reply	Class Certification
5/17/2022	Guy Wallace	1.9	\$1,350	\$2,565	revise and edit class certification reply brief	Class Certification
5/17/2022	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW re Jones and Belson expert declarations, variance analysis, Mastin and Waters expert decs	Class Certification
5/17/2022	Mark Johnson	1.0	\$1,150	\$1,150	participate in team videoconference mtg re status of all pieces of reply submission iso class certification, assignment of remaining tasks, technical and strategy issues - GBW, GCG, JY, AX, BBK, KS, TCC, RLS, BU	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/17/2022	Mark Johnson	0.8	\$1,150	\$920	review and provide proposed edits to reply dec from PK iso class certification.	Class Certification
5/17/2022	Mark Johnson	0.8	\$1,150	\$920	review and edit draft Flores declaration; email COC re edits, suggestions	Class Certification
5/17/2022	Mark Johnson	0.3	\$1,150	\$345	call w/ J Mastin re reply dec iso class cert, issues related to photos and measurements	Class Certification
5/17/2022	Mark Johnson	6.7	\$1,150	\$7,705	continue working on and finalize draft of Waters declaration	Class Certification
5/17/2022	Mark Johnson	0.5	\$1,150	\$575	calls w/ GBW re Flores, Kennedy, Waters reply declarations	Class Certification
5/17/2022	Mark Johnson	0.2	\$1,150	\$230	email exchanges w/ DSS attorney Joseph Lam re document subpoena to DSS CAB, accessing documents	Discovery (Non-Deposition)
5/17/2022	Mark Johnson	0.4	\$1,150	\$460	download and review docs produced by DSS CAB, email COC re same	Discovery (Non-Deposition)
5/17/2022	Mark Johnson	0.4	\$1,150	\$460	call w/ B Umpierre re mtn to exclude expert opinions	Other Motions
5/17/2022	Mark Johnson	1.8	\$1,150	\$2,070	work on mtn to exclude expert opinions	Other Motions
5/17/2022	Rachel Steyer	0.9	\$750	\$675	daily check in meeting with TCC, MTJ, GBW and RBGG, BSU to review and discuss filing checklist	Case Organization, Planning and Strategy
5/17/2022	Rachel Steyer	0.2	\$750	\$150	call with GBW to review and discuss questions in RLS draft declaration ISO reply breif	Class Certification
5/17/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising DMS draft declaration based on comments from declarant	Class Certification
5/17/2022	Rachel Steyer	0.3	\$750	\$225	call with DMS declarant to review and discuss proposed changes to declaration	Class Certification
5/17/2022	Rachel Steyer	2.5	\$750	\$1,875	editing and revising RLS decl ISO MPA class cert, declaration appendix, tables	Class Certification
5/17/2022	Rachel Steyer	0.3	\$750	\$225	email to DMS and KGJ concerning cite checking declaraiton tables	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/17/2022	Rachel Steyer	0.2	\$750	\$150	call with KGJ to review and discuss process of gathering and preparing authorization request forms	Class Outreach and Contact
5/17/2022	Rachel Steyer	0.2	\$750	\$150	updating and revising barriers spreadsheet for MTJ to reflect tally of total number of barrier disagreements	Experts (Including Retention)
5/17/2022	Travis Close	0.2	\$850	\$170	Call to douglas cross re: revised draft of declaration sent and next steps	Case Organization, Planning and Strategy
5/17/2022	Travis Close	1.2	\$850	\$1,020	Review and analyze latest draft of Wallace declaration, with particular emphasis on emergency evacuation and transportation sections	Case Organization, Planning and Strategy
5/17/2022	Travis Close	0.3	\$850	\$255	Emails to JY re: coordinating the version of BEST audits to cite in expert reply decs	Case Organization, Planning and Strategy
5/17/2022	Travis Close	0.9	\$850	\$765	Team meeting re: progress on expert declarations, checklist for briefs, and revisions to Wallace declaration	Case Organization, Planning and Strategy
5/17/2022	Travis Close	2.6	\$850	\$2,210	Updates to List of Evidence Considered for Douglas Cross Reply declaration; organize all docs cited therein and send to co-counsel	Pleadings and Motions Re: Pleadings
5/17/2022	Travis Close	0.2	\$850	\$170	Email to GBW re: reviewing wallace declaration draft	Pleadings and Motions Re: Pleadings
5/17/2022	Travis Close	0.6	\$850	\$510	Address insertions and revisions by Cross to latest draft of Cross declaration	Pleadings and Motions Re: Pleadings
5/17/2022	Travis Close	1.2	\$850	\$1,020	Final back-and-forth revisions with Cross over Doug Cross reply declaration before signature	Pleadings and Motions Re: Pleadings
5/18/2022	Guy Wallace	5.1	\$1,350	\$6,885	revise and edit reply brief re class certification	Class Certification
5/18/2022	Guy Wallace	1.2	\$1,350	\$1,620	review and analysis of draft of reply declaration of Dr. Flores re class certification; com's with JT; BU; MTJ	Class Certification
5/18/2022	Guy Wallace	0.5	\$1,350	\$675	revise and edit draft reply declaration of Waters re class cert; com's with MTJ re same	Class Certification
5/18/2022	Guy Wallace	0.5	\$1,350	\$675	revise and edit draft reply declaration of Steyer; com's with RLS re same	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/18/2022	Guy Wallace	1.1	\$1,350	\$1,485	prepare for and participate in zoom with GCG; JY; BBK; AX; KS; BU; MTJ; TCC; RLS re preparation of class certification reply papers	Class Certification
5/18/2022	Guy Wallace	1.2	\$1,350	\$1,620	further revisions to draft reply brief re MCC; com's with GCG; AX re same	Class Certification
5/18/2022	Guy Wallace	3.3	\$1,350	\$4,455	revise and edit further draft of class certification reply brief	Class Certification
5/18/2022	Guy Wallace	0.6	\$1,350	\$810	revise and edit draft reply declaration of Mastin re class certification; com's with MTJ re same	Class Certification
5/18/2022	Mark Johnson	0.3	\$1,150	\$345	call w/ J Mastin re expert reply dec	Class Certification
5/18/2022	Mark Johnson	0.9	\$1,150	\$1,035	call w/ G Waters re expert reply dec	Class Certification
5/18/2022	Mark Johnson	1.0	\$1,150	\$1,150	team zoom meeting re status of pieces of class cert reply fling, logixtics, expert dexts, motion to exlcude, motions to seal. All SW, RBGG team members particpatd	Class Certification
5/18/2022	Mark Johnson	2.5	\$1,150	\$2,875	work on Waters reply declaration, including revisions from GW, GBW, email exchanges, proofign, finalizing and com w/ COC re same	Class Certification
5/18/2022	Mark Johnson	3.7	\$1,150	\$4,255	further work on Mastin reply declaration including additional revisions based on call, edits from JM, research record and cites, proofing, finalizing and email exchanges w/ JM and COC	Class Certification
5/18/2022	Mark Johnson	4.0	\$1,150	\$4,600	work on mtn to exclude expert opinions and com w/ COC BU re same	Other Motions
5/18/2022	Rachel Steyer	0.6	\$750	\$450	daily check in with MTJ, GBW, TCC and RBGG co-counsel and BSU to review outstanding tasks and assignments for reply brief filing	Case Organization, Planning and Strategy
5/18/2022	Rachel Steyer	0.2	\$750	\$150	editing and revising GSL draft declaration	Class Certification
5/18/2022	Rachel Steyer	0.2	\$750	\$150	call with KGJ to review and discuss status of declarant's participation	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/18/2022	Rachel Steyer	1.3	\$750	\$975	reviewing and proofreading GBW MPA ISO class cert	Class Certification
5/18/2022	Rachel Steyer	1.0	\$750	\$750	finishing drafting RLS declaration, finalizing appendix and cover sheets, caption page, updating and tallying numbers	Class Certification
5/18/2022	Rachel Steyer	1.8	\$750	\$1,350	conducting cite check and proofreading expert reply declaration ISO class cert	Experts (Including Retention)
5/18/2022	Rachel Steyer	1.2	\$750	\$900	conducted proofread of plaintiffs' expert reply declaration for MPA ISO class cert	Experts (Including Retention)
5/18/2022	Rachel Steyer	0.2	\$750	\$150	incorporating edits into Waters reply declaration in MS word	Experts (Including Retention)
5/18/2022	Rachel Steyer	1.2	\$750	\$900	cite checking Belsen reply declaration for MPA ISO class cert	Experts (Including Retention)
5/18/2022	Travis Close	0.2	\$850	\$170	Review and analyze depo errata by Douglas Anderson	Case Organization, Planning and Strategy
5/18/2022	Travis Close	0.6	\$850	\$510	Team meeting re: checking in on expert declarations, GBW declaration, and checklist for filing items	Case Organization, Planning and Strategy
5/18/2022	Travis Close	1.2	\$850	\$1,020	Cite checks on June Kailes reply declaration & matching Exhibit B	Case Organization, Planning and Strategy
5/18/2022	Travis Close	0.9	\$850	\$765	Proposed redactions for Doug Cross reply dec iso class cert	Pleadings and Motions Re: Pleadings
5/18/2022	Travis Close	0.8	\$850	\$680	Proposed redactions for June Kailes reply dec iso class cert	Pleadings and Motions Re: Pleadings
5/18/2022	Travis Close	1.2	\$850	\$1,020	Finalize Exh A to Doug Cross reply dec & combine, attach to declaration	Pleadings and Motions Re: Pleadings
5/18/2022	Travis Close	1.1	\$850	\$935	Review and analyze latest draft of Reply MPA Iso class cert	Pleadings and Motions Re: Pleadings
5/18/2022	Travis Close	1.3	\$850	\$1,105	Final review of Exhibit A to June Kailes reply Dec & cites checks before filing	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/19/2022	Guy Wallace	4.4	\$1,350	\$5,940	revise and edit further draft of reply brief re class certification; com's with GCG; JY re same	Class Certification
5/19/2022	Guy Wallace	1.5	\$1,350	\$2,025	revise and edit draft of reply declaration of Dr. Kennedy re class certification	Class Certification
5/19/2022	Guy Wallace	0.8	\$1,350	\$1,080	team zoom with GCG; JY; BBK;AX; KS; BU; MTJ; TCC; RLS re preparation of class certification reply papers	Class Certification
5/19/2022	Guy Wallace	2.2	\$1,350	\$2,970	review and analysis of motions to exclude Defendants' experts; revise and edit same; com's with MTJ; BU re same	Other Motions
5/19/2022	Mark Johnson	0.4	\$1,150	\$460	team zoom mtg re finalizing and filing pieces of reply iso class certification	Class Certification
5/19/2022	Mark Johnson	1.2	\$1,150	\$1,380	review latest draft of reply brief iso class cert, identify and add citations for section related to waters, mastin	Class Certification
5/19/2022	Mark Johnson	0.7	\$1,150	\$805	review pages designated as confidential in anderson depo and emails w/ J Yellen re same for redactions to mtn to exclude	Class Certification
5/19/2022	Mark Johnson	0.4	\$1,150	\$460	callls / emails w/ BU re motions to exclude Anderson, Saad and Jacobson testimony	Class Certification
5/19/2022	Mark Johnson	0.3	\$1,150	\$345	review and comment on additions to Kennedy reply dec iso class certification and redactions to same.	Class Certification
5/19/2022	Mark Johnson	6.5	\$1,150	\$7,475	work on and finalize mtn to exclude Anderson testimony; proposed order for same	Class Certification
5/19/2022	Mark Johnson	5.5	\$1,150	\$6,325	work on mtn to exclude Saad and Jacobsen testimony	Other Motions
5/19/2022	Rachel Steyer	0.4	\$750	\$300	daily meeting with TCC, MTJ, GBW, RBGG co-counsel, BSU to review outstanding tasks for filing	Case Organization, Planning and Strategy
5/19/2022	Rachel Steyer	0.2	\$750	\$150	communications on teams with DMS, KGJ, OJO concerning declarant authorization forms	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/19/2022	Rachel Steyer	1.2	\$750	\$900	reviewing and cite checking Belson reply declaration MPA ISO class cert	Experts (Including Retention)
5/19/2022	Rachel Steyer	0.2	\$750	\$150	call with David Marks to clarify which citations to add to expert declaration	Experts (Including Retention)
5/19/2022	Rachel Steyer	0.4	\$750	\$300	adding in Schroyer cites to Belson reply declaration	Experts (Including Retention)
5/19/2022	Travis Close	0.4	\$850	\$340	Team meeting re: edits to reply brief, Schroyer declaration, belson declaration, Kennedy/Flores/Jones	Case Organization, Planning and Strategy
5/19/2022	Travis Close	0.5	\$850	\$425	Review and analyze latest DSS facility evaluation reports and complaint investigation reports from Roseville, Irvine, Valley View, Riverwalk, and Lodi facilities	Discovery (Non-Deposition)
5/19/2022	Travis Close	1.1	\$850	\$935	Analyze and cite check latest draft of reply brief iso class cert, incorporating revisions from RBGG	Pleadings and Motions Re: Pleadings
5/19/2022	Travis Close	0.8	\$850	\$680	Revisions to draft reply brief to add Kailes and Cross cites	Pleadings and Motions Re: Pleadings
5/19/2022	Travis Close	0.8	\$850	\$680	Review and analyze Dr. Belson's reply dec iso class cert	Pleadings and Motions Re: Pleadings
5/19/2022	Travis Close	0.8	\$850	\$680	Review and analyze reply dec of patrick kennedy iso class cert	Pleadings and Motions Re: Pleadings
5/19/2022	Travis Close	1.3	\$850	\$1,105	Legal research re: cases in which courts found that plaintiffs are not required to proof intentional discrimination under the ADA	Pleadings and Motions Re: Pleadings
5/20/2022	Guy Wallace	0.9	\$1,350	\$1,215	legal research and analysis re potential arguments for sur reply by defendants; com's with MTJ; RLS re same	Class Certification
5/20/2022	Guy Wallace	2.2	\$1,350	\$2,970	review and analysis of arguments and points made in Plaintiffs' class cert reply and motions to exclude Defendants' experts; analysis of potential further points re same	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/20/2022	Mark Johnson	0.6	\$1,150	\$690	call w/ GBW re class cert filing, follow up re disclosures from experts; anticipated response from Defendants - motions to exclude declarations, pieces of declarations, mtn for surreply; issues re confidentiality	Class Certification
5/20/2022	Rachel Steyer	0.2	\$750	\$150	reading through plaintiffs' opposition to d's request for sur-reply provided by GBW as part of research	Misc. Research
5/20/2022	Rachel Steyer	0.2	\$750	\$150	emails to GBW concerning research project about new evidence introduced in reply	Misc. Research
5/20/2022	Travis Close	0.2	\$850	\$170	Review and analyze Ps' admin motion to seal Dec of Gay Grunfeld iso that motion	Case Organization, Planning and Strategy
5/20/2022	Travis Close	0.8	\$850	\$680	Review and analyze dec of Cristina Flores iso Ps reply for class cert + exhibits	Case Organization, Planning and Strategy
5/20/2022	Travis Close	0.5	\$850	\$425	Review and analyze depo errata for Ali Saad; check Defs "clairifications" for attempts to change factual answers	Depositions
5/20/2022	Travis Close	0.9	\$850	\$765	Review and analyze Plfs' motion to exclude testimony of sheldon jacobson and ali saad	Pleadings and Motions Re: Pleadings
5/20/2022	Travis Close	0.2	\$850	\$170	Review and analyze request for judicial notice iso Ps' reply iso class cert	Pleadings and Motions Re: Pleadings
5/23/2022	Guy Wallace	2.3	\$1,350	\$3,105	review and analysis of Defendants' opposition to class certification and effectiveness of Plaintiffs' reply papers thereto	Class Certification
5/23/2022	Guy Wallace	3.1	\$1,350	\$4,185	com's with Defendants re motion for sur reply and further discovery re class certification; review and analysis of D's motion seeking same; com's with JY; MTJ; RLS re same; preparation of counter-arguments re Defendants' administrative motion	Other Motions
5/23/2022	Mark Johnson	0.3	\$1,150	\$345	review and edit Mastin reply dec iso class certification and com w/ JY re same	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/23/2022	Mark Johnson	0.5	\$1,150	\$575	review email from OC Maatman re mtn for emergency conference w/ court & coms w/ GBW & JY re same - emails & call with GBW	Class Certification
5/23/2022	Mark Johnson	0.2	\$1,150	\$230	review and analyze D mtn for emergency status conference	Class Certification
5/23/2022	Mark Johnson	0.3	\$1,150	\$345	call w GBW re D mtn for emergency status conference and strategy for responding to same	Class Certification
5/23/2022	Mark Johnson	0.5	\$1,150	\$575	review record - opp and reply on class cert for comparison of filings to respond to mtn for emergency status conference	Class Certification
5/23/2022	Mark Johnson	0.7	\$1,150	\$805	review and analyze docs produced by DSS CAB; com w/ COC re same	Discovery (Non-Deposition)
5/23/2022	Mark Johnson	0.1	\$1,150	\$115	email exchange w/ Joseph Lam re DSS CAB production	Discovery (Non-Deposition)
5/23/2022	Mark Johnson	0.2	\$1,150	\$230	reemail exchange w/ RAB re analysis of confidentiality designations by D in document production	Discovery (Non-Deposition)
5/23/2022	Rachel Steyer	0.2	\$750	\$150	communications with KGJ on teams concerning gathering declarant authorization forms	Class Outreach and Contact
5/23/2022	Rachel Steyer	0.2	\$750	\$150	call with KGJ to review and discuss follow up with declarants to obtain POA docs and authorization forms	Discovery (Non-Deposition)
5/23/2022	Rachel Steyer	0.2	\$750	\$150	email to DMS regarding mistaken declarant authorization forms	Discovery (Non-Deposition)
5/23/2022	Rachel Steyer	1.1	\$750	\$825	email to GBW summarizing research findings, providing cases and string cite	Misc. Research
5/23/2022	Rachel Steyer	0.9	\$750	\$675	calculating total number of pages of exhibits and evidence filed by defendants in opposition to class cert for GBW to respond to emergency motino for case management conference	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/23/2022	Rachel Steyer	0.2	\$750	\$150	response to JSY of RBGG and GBW, MTJ, TCC revising total page count of defendants' exhibits filed in opposition motion	Other Motions
5/23/2022	Rachel Steyer	0.4	\$750	\$300	call with GBW to review assignment in respnse to defendants' emergency motion for case management conference	Other Motions
5/23/2022	Rachel Steyer	0.8	\$750	\$600	breaking down page count of plaintiffs' exhibits and declarations in reply brief, to cross check numbers referenced in defendants' emergency motion for case management conference	Other Motions
5/23/2022	Rachel Steyer	1.5	\$750	\$1,125	continuing research into what constitutes new evidence on reply	Other Motions
5/23/2022	Travis Close	0.4	\$850	\$340	Review and analyze Def's Admin motion for emergency status conference & exhs	Case Organization, Planning and Strategy
5/23/2022	Travis Close	0.8	\$850	\$680	Legal research re: local rules governing schedule and response time for emergency motions	Case Organization, Planning and Strategy
5/23/2022	Travis Close	1.7	\$850	\$1,445	Analyze communications received from Cal DSS showing interactions with Brookdlae's designated liason/paralegal Andrew Lindner and the central DSS headquarters	Discovery (Non-Deposition)
5/23/2022	Travis Close	1.3	\$850	\$1,105	Review and analyze evidence of Brookdale's insurance cards collected from the faciiliites re transit vehicles	Discovery (Non-Deposition)
5/23/2022	Travis Close	1.4	\$850	\$1,190	Investigate recent news articles discussing Brookdale's status as owners of the facilities at issue in this case	Pleadings and Motions Re: Pleadings
5/24/2022	Guy Wallace	2.2	\$1,350	\$2,970	legal research and analysis re permissible scope of evidence that may be submitted in response to opposition arguments and evidence; com's with MTJ re same (.5)	Misc. Research

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/24/2022	Guy Wallace	3.4	\$1,350	\$4,590	preparation and drafting of opposition to D's "emergency" administrative motion	Other Motions
5/24/2022	Guy Wallace	1.8	\$1,350	\$2,430	legal research and analysis re proper scope of reply evidence; com's with MTJ; JY re potential disclosures re Drs. Jones and Belson; potential motions to exclude from defendants; impact on class certification motion	Other Motions
5/24/2022	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re response to D admin mtn for status conference, possible compromise positions on depos, timing of motions; production of expert disclosures	Class Certification
5/24/2022	Mark Johnson	0.5	\$1,150	\$575	follow-up call w/ GBW re anticipated filings by Def including objections to reply evidence, strategy for responding to same, implications for hearing date and argument	Class Certification
5/24/2022	Mark Johnson	2.0	\$1,150	\$2,300	research re new evidence on reply including expert declarations.	Class Certification
5/24/2022	Mark Johnson	0.6	\$1,150	\$690	review new case from ND Cal granting class certification for possible notice of recent authority (LabCorp)	Class Certification
5/24/2022	Mark Johnson	0.7	\$1,150	\$805	review order from court re emergency status conference and call w/ GBW re same and re anticipated objections and filing by OC	Class Certification
5/24/2022	Rachel Steyer	0.3	\$750	\$225	called family member of current residetn back, discussed case	Class Outreach and Contact
5/24/2022	Rachel Steyer	5.8	\$750	\$4,350	updating and revising plaintiffs supplemental initial disclosures, reviewing GBW and BBK declarations to identify new witnesses and exhibits to add and update	Discovery (Non-Deposition)
5/24/2022	Travis Close	0.6	\$850	\$510	Review and analyze recent facility evalution reports and complaint investigation reports issued for Riverwalk, Chatsworth, Gardens of Tarzana, Central Whittier, Alhambra, Napa Brookdale facilities	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/24/2022	Travis Close	0.2	\$850	\$170	Review and analyze court's decision denying Brookdale's motion for emergency status conference	Pleadings and Motions Re: Pleadings
5/24/2022	Travis Close	0.3	\$850	\$255	Email to team re: implications for class cert decision in Davis v. Laboratory corp	Pleadings and Motions Re: Pleadings
5/25/2022	Guy Wallace	1.1	\$1,350	\$1,485	legal research and analysis re admissibility of documents produced by defendants in discovery and attached to attorney declaration	Class Certification
5/25/2022	Guy Wallace	0.8	\$1,350	\$1,080	com's with JY; JT; BU; MTJ re disclosure of materials from Dr. Jones; Dr. Belson; Dale Schroyer	Experts (Including Retention)
5/25/2022	Mark Johnson	0.5	\$1,150	\$575	call w/ GBW, JY, JT re disclosure of expert materials related to reply declarations	Class Certification
5/25/2022	Mark Johnson	1.7	\$1,150	\$1,955	work on ltr to OC re over-designation of confidential materials; review materials re same	Discovery (Non-Deposition)
5/25/2022	Mark Johnson	0.6	\$1,150	\$690	research doc production re operation plans and communications re same; draft email to JP re conducting further research and analysis	Discovery (Non-Deposition)
5/25/2022	Mark Johnson	1.6	\$1,150	\$1,840	work on notice of errata and corrected motion to exclude anderson opinions; identify missing cites; coms w/ JY, LEC re same	Other Motions
5/25/2022	Rachel Steyer	0.2	\$750	\$150	call with declarant to review and discuss transmittal of additional documents	Discovery (Non-Deposition)
5/25/2022	Travis Close	1.6	\$850	\$1,360	Review and analyze Cal DSS regulations requiring plans of operations and detailed criteria within; compare to operations plans produced by Brookdale	Discovery (Non-Deposition)
5/25/2022	Travis Close	1.3	\$850	\$1,105	Analyze assisted living procedures produced by Brookdale in plans of operation for uniformity	Discovery (Non-Deposition)
5/25/2022	Travis Close	0.8	\$850	\$680	Review and analyze filed versions of Kailes declaration iso Ps' reply for possible errors	Experts (Including Retention)
5/25/2022	Travis Close	0.7	\$850	\$595	Call to june kailes re: notes taken on supplemenetal plans to share with defense	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/25/2022	Travis Close	0.9	\$850	\$765	Review and analyze filed versions of Cross declaration iso Ps' reply for possible errors	Pleadings and Motions Re: Pleadings
5/25/2022	Travis Close	1.2	\$850	\$1,020	Analysis of new declarants filed with Ps' reply who experienced transportation issues	Pleadings and Motions Re: Pleadings
5/26/2022	Guy Wallace	0.8	\$1,350	\$1,080	legal research and analysis re Defendants' coverage under Title III of ADA and DOJ regulatory guidance re same	Class Certification
5/26/2022	Guy Wallace	1.1	\$1,350	\$1,485	legal research and analysis re scope of permissible evidentiary submissions on reply	Class Certification
5/26/2022	Guy Wallace	0.4	\$1,350	\$540	com's with RLS re preparation of supplement to Initial Disclosures	Discovery (Non-Deposition)
5/26/2022	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ; TCC re disclosure of expert materials re Drs. Jones and Belson; further work from Dr. Flores and Schroyer	Experts (Including Retention)
5/26/2022	Guy Wallace	0.4	\$1,350	\$540	review and analysis of Defendants' opposition to motion to strike supplemental declaration of Dr. Saad	Other Motions
5/26/2022	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of D's objections to Plaintiffs' evidence submitted in reply to Defendants' opposition to class certification; com's with JY; MTJ re same	Other Motions
5/26/2022	Mark Johnson	0.4	\$1,150	\$460	calls (x4) w GBW re expert disclosures, confidentiality designation issues, D's objections to reply evidence, opposition to mtn to strike Saad supplemental declaration	Class Certification
5/26/2022	Mark Johnson	1.2	\$1,150	\$1,380	emails w/ COC JT and with RAB re downloading, organizing docs and data related to expert reply declarations; uploading same and transmitting to OC	Class Certification
5/26/2022	Mark Johnson	0.8	\$1,150	\$920	review D's objections to reply evidence, opp to mtn to strike Saad supplemental declaration, declaration in support of sealing docs filed with reply	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/26/2022	Mark Johnson	2.0	\$1,150	\$2,300	continue drafting and finalize ltr to OC re challenge to confidentiality designations, incorporate edits from coc	Discovery (Non-Deposition)
5/26/2022	Rachel Steyer	0.3	\$750	\$225	reviewing production of documents corresponding to plans of operation	Discovery (Non-Deposition)
5/26/2022	Rachel Steyer	1.6	\$750	\$1,200	reviewing and updating supplemental disclosures, adding additional exhibits and documents for disclosure	Discovery (Non-Deposition)
5/26/2022	Rachel Steyer	0.4	\$750	\$300	reviewing plaintiffs motion to exclude certain testimony of defendants' expert Douglas Anderson	Other Motions
5/26/2022	Rachel Steyer	0.2	\$750	\$150	call with GBW to review and discuss questions about initial disclosures and other assignments	Other Motions
5/26/2022	Travis Close	0.2	\$850	\$170	Email to team re: revisions to draft letter on challenging defendants' confidentiality designations	Case Organization, Planning and Strategy
5/26/2022	Travis Close	0.8	\$850	\$680	Create list of disclosures to defendants from experts June Kailes and Doug Cross	Case Organization, Planning and Strategy
5/26/2022	Travis Close	0.2	\$850	\$170	Call with MTJ re: Dkt no 204 and whether additional production of expert notes and materials is necessary	Case Organization, Planning and Strategy
5/26/2022	Travis Close	0.6	\$850	\$510	Revisions to draft letter invoking dispute resolution in protective order re: confidentiality designations	Discovery (Non-Deposition)
5/26/2022	Travis Close	0.3	\$850	\$255	Call with GBW re: production of supplemental notes and materials to defendnats	Discovery (Non-Deposition)
5/26/2022	Travis Close	0.2	\$850	\$170	Email to RAB re: docs needed to send to defendants by this evening regarding June Kailes' notes	Pleadings and Motions Re: Pleadings
5/27/2022	Guy Wallace	0.6	\$1,350	\$810	legal research and analysis re recent decision in Davis v. Laboratory Corp. of America and damages classes under the Unruh Act	Class Certification
5/27/2022	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of Defendants' objections to Plaintiffs' reply evidence and opposition to motion to exclude supplemental declaration of Dr. Saad; com's with JY; BBK; MTJ re same	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/27/2022	Rachel Steyer	0.7	\$750	\$525	preparing email to GBW summarizing updates to supplemental disclosures, breakdown of new and old exhibits in reply declarations	Discovery (Non-Deposition)
5/27/2022	Rachel Steyer	1.0	\$750	\$750	updating and adding to supplemental initial disclosures	Discovery (Non-Deposition)
5/27/2022	Travis Close	0.4	\$850	\$340	Review and analyze Def's opposition to Ps' motion to strike the supplemental declaration of Ali Saad	Pleadings and Motions Re: Pleadings
5/27/2022	Travis Close	1.4	\$850	\$1,190	Legal research re: In re Graphics Processing Units Antitrust Litig and other cases cited in Def's motion for the proposition that plaintiffs were not allowed to file new expert decs on reply	Pleadings and Motions Re: Pleadings
5/27/2022	Travis Close	0.4	\$850	\$340	Review and analyze Def's objections to evidence used in Plf's reply in support of motion for class certification	Pleadings and Motions Re: Pleadings
5/27/2022	Travis Close	0.5	\$850	\$425	Review and analyze Dec of Jacobson in response to Plf's admin motion to consider whether certain docs should be filed under seal	Pleadings and Motions Re: Pleadings
5/27/2022	Travis Close	1.5	\$850	\$1,275	Legal research re: cases cited by Defs for argument that Plfs were not allowed to submit evidence in attorney declarations on reply	Pleadings and Motions Re: Pleadings
5/29/2022	Guy Wallace	5.3	\$1,350	\$7,155	review and analysis of Defendants' opposition to class certification; defendants' arguments in opposition to Plaintiffs' arguments and evidence submitted in reply	Class Certification
5/31/2022	Guy Wallace	0.8	\$1,350	\$1,080	prepare for and participate in team zoom with JY; AX; MTJ; RLS re preparation for class certification and reply brief re motion to strike supplemental declaration of Dr. Saad	Class Certification
5/31/2022	Guy Wallace	0.7	\$1,350	\$945	com's with Maatman; GCG; JY; MTJ re Defendants' request that Plaintiffs' stipulate to continuance of the hearing on class certification	Class Certification
5/31/2022	Guy Wallace	0.8	\$1,350	\$1,080	preparation for hearing on motion for class certification and related motions	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/31/2022	Guy Wallace	0.2	\$1,350	\$270	com's with JAU re preparation for class certification hearing	Class Certification
5/31/2022	Guy Wallace	3.1	\$1,350	\$4,185	preparation and drafting of argument re Plaintiffs' reply evidence is proper under applicable law	Other Motions
5/31/2022	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of Defendants' motion to continue hearing; com's with MTJ re same	Other Motions
5/31/2022	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re class cert hearing	Case Organization, Planning and Strategy
5/31/2022	Mark Johnson	0.5	\$1,150	\$575	call w J Yellin, Amy Xu, GBW re strategy for reply iso opposition to mtn strike supplemental Saad Declaration	Other Motions
5/31/2022	Mark Johnson	0.7	\$1,150	\$805	calls (x3) w/ GBW re D opposition to mtn to strike Saad deposition, Objections to reply evidence, admin mtn to continue hearing date on class certification, response to same	Other Motions
5/31/2022	Mark Johnson	0.4	\$1,150	\$460	review D admin mtn for continuance of hearing and email com w/ COC re same..	Other Motions
5/31/2022	Mark Johnson	1.0	\$1,150	\$1,150	review draft of reply iso mtn to strike Saad supplemental declaration and begin editing same	Other Motions
5/31/2022	Rachel Steyer	0.5	\$750	\$375	meeting with GBW, MTJ and RBGG co-counsel to review and discuss response to motion to strike	Case Organization, Planning and Strategy
5/31/2022	Rachel Steyer	0.6	\$750	\$450	followed up with family member of current resident who called in response to receiving letter	Class Outreach and Contact
5/31/2022	Rachel Steyer	0.2	\$750	\$150	preparing and sending declarant authorization forms	Discovery (Non-Deposition)
5/31/2022	Rachel Steyer	0.2	\$750	\$150	preparing and sending declarant authorization forms	Discovery (Non-Deposition)
5/31/2022	Rachel Steyer	0.2	\$750	\$150	call with declarant to remind him to sign authorization forms and send POA	Discovery (Non-Deposition)
5/31/2022	Travis Close	1.4	\$850	\$1,190	research cases showing that new expert testimony may be filed on reply	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/31/2022	Travis Close	1.2	\$850	\$1,020	Legal research re: how to determine whether new evidence submitted on reply is consistent with arguments in made in prior motion	Case Organization, Planning and Strategy
5/31/2022	Travis Close	0.6	\$850	\$510	Review analysis by JMP of Bookdale's plans of operations	Discovery (Non-Deposition)
5/31/2022	Travis Close	1.4	\$850	\$1,190	Analysis of content in transportation policies located within Brookdale's Plan of Operations	Discovery (Non-Deposition)
5/31/2022	Travis Close	1.3	\$850	\$1,105	Cite check cases showing that parties can submit new evidence on reply if it addresses arguments on opposition	Pleadings and Motions Re: Pleadings
5/31/2022	Travis Close	0.8	\$850	\$680	Review and analyze draft response to Def's opposition to Plf's reply evidence	Pleadings and Motions Re: Pleadings
5/31/2022	Travis Close	0.2	\$850	\$170	Review and analyze Def's motion to conitnue hearings	Pleadings and Motions Re: Pleadings
5/31/2022	Travis Close	0.6	\$850	\$510	Cite check cases cited in Def's motion to continue hearings set for june 16	Pleadings and Motions Re: Pleadings
6/1/2022	Guy Wallace	0.5	\$1,350	\$675	preparation for and tc with JAU re analysis of motions to exclude expert testimony; preparation for class cert hearing	Class Certification
6/1/2022	Guy Wallace	1.8	\$1,350	\$2,430	review and analysis of Defendants' request to continue hearing on class certification; objection to evidence submitted on reply; preparation of counter-arguments re same	Other Motions
6/1/2022	Guy Wallace	3.4	\$1,350	\$4,590	review and analysis of ECF No. 522 and preparation and drafting of P's response thereto; com's with JY; AX; MTJ re same	Other Motions
6/1/2022	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of edits to draft of reply brief re motion to strike Saad supplemental declaration	Other Motions
6/1/2022	Guy Wallace	1.3	\$1,350	\$1,755	legal research and analysis re Defendants' cases cited in ECF No. 518	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/1/2022	Guy Wallace	1.7	\$1,350	\$2,295	revise and edit reply brief re Dr. Saad's supplemental declaration; draft of response re Defendants' objections to evidence; com's with MTJ re same	Other Motions
6/1/2022	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re Class Cert hearing preparation	Case Organization, Planning and Strategy
6/1/2022	Mark Johnson	3.5	\$1,150	\$4,025	work on drafting response to objections to reply evidence	Class Certification
6/1/2022	Mark Johnson	2.3	\$1,150	\$2,645	continue drafting response to objections to reply evidence, including review of objections, wallace and other reply declarations and D's opposition to class cert motion for reference in same.	Class Certification
6/1/2022	Mark Johnson	0.8	\$1,150	\$920	pull and review D cases iso objections to reply evidence	Class Certification
6/1/2022	Mark Johnson	0.1	\$1,150	\$115	talk w RLS re proposed request for declarant resident files.	Discovery (Non-Deposition)
6/1/2022	Mark Johnson	0.4	\$1,150	\$460	call w J Thornton re reply iso mtn to strike Saad supplemental declaration, scope of supplemental opinion.	Other Motions
6/1/2022	Mark Johnson	2.9	\$1,150	\$3,335	work on reply iso mtn to strike Saad declaration; email to COC re same	Other Motions
6/1/2022	Mark Johnson	0.6	\$1,150	\$690	review AX revised version of reply iso mtn to strike Saad supp declaration and make proposed edits to same.	Other Motions
6/1/2022	Rachel Steyer	0.3	\$750	\$225	call with declarant to review and describe authorization forms	Discovery (Non-Deposition)
6/1/2022	Rachel Steyer	0.3	\$750	\$225	call with declarant to review and discuss authorization forms	Discovery (Non-Deposition)
6/1/2022	Rachel Steyer	0.2	\$750	\$150	response to class member declarant providing case status update, providnig documents as requested	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/1/2022	Rachel Steyer	0.3	\$750	\$225	updating draft MTJ letter requesting declarant resident files	Discovery (Non-Deposition)
6/1/2022	Rachel Steyer	1.0	\$750	\$750	reviewing and counting page count number, exhibits, and declarations from opening class cert motion per GBW request	Misc. Research
6/1/2022	Travis Close	0.6	\$850	\$510	Meet with LEC re: assignments for this week and filing for Thursday	Case Organization, Planning and Strategy
6/1/2022	Travis Close	0.1	\$850	\$85	Review and analyze judge gilliam's order directing Plfs to file reply to motion to strike evidence	Case Organization, Planning and Strategy
6/1/2022	Travis Close	1.3	\$850	\$1,105	Analysis of management and lease agreements recently produced by Brookdale for info re: control over emergency policies at facilities	Case Organization, Planning and Strategy
6/1/2022	Travis Close	1.4	\$850	\$1,190	Analysis of inconsistent testimony between declarants in Plf's reply brief and Brookdale EDs that were deposed on topic of accessible transportation policy	Depositions
6/1/2022	Travis Close	1.6	\$850	\$1,360	Analysis of Brookdale's Plans of Operations recently produced for info re: emergency evacuation policies	Discovery (Non-Deposition)
6/1/2022	Travis Close	1.0	\$850	\$850	Analysis of inconsistent testimony between declarants in Plf's reply brief and Brookdale EDs that were deposed on topic of emergency evacuation	Discovery (Non-Deposition)
6/1/2022	Travis Close	0.5	\$850	\$425	Review and analyze latest version of draft reply iso Plf's motion to strike supplemental dec of Ali Saad	Pleadings and Motions Re: Pleadings
6/1/2022	Travis Close	0.7	\$850	\$595	Cite checking of cases cited in Reply dec iso motion to strike supplemental Saad declaration	Pleadings and Motions Re: Pleadings
6/2/2022	Guy Wallace	5.1	\$1,350	\$6,885	revise and edit response to Defendants' Objections to Plaintiffs' reply evidence re motion for class certification	Other Motions
6/2/2022	Guy Wallace	0.6	\$1,350	\$810	review and analysis of Defendants' reply briefs re motions to strike testimony of Jacobson; Saad; Anderson	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/2/2022	Jennifer Bybee	3.9	\$925	\$3,608	Review D's Mtn to Exclude June Kailes and create chart re criticisms in same	Class Certification
6/2/2022	Rachel Steyer	0.2	\$750	\$150	spoke with former Brookdale resident, explained case (per follow up from RBGG)	Class Outreach and Contact
6/2/2022	Rachel Steyer	0.3	\$750	\$225	spoke with daughter of former resident who contacted RBGG, discussed case, set plan for further follow up in coming weeks	Class Outreach and Contact
6/2/2022	Rachel Steyer	0.6	\$750	\$450	tabulating number of declarants obtained from pre-2022 class lists	Other Motions
6/2/2022	Travis Close	1.3	\$850	\$1,105	Analyze floor plans provided in plans of operation for evidence of emergency evacuation exits	Discovery (Non-Deposition)
6/2/2022	Travis Close	0.8	\$850	\$680	Add citations in Plf's response to Def's objections of reply evidence	Pleadings and Motions Re: Pleadings
6/2/2022	Travis Close	0.5	\$850	\$425	Review, analyze, and revise latest draft of Plf's response to Def's objections of reply evidence	Pleadings and Motions Re: Pleadings
6/2/2022	Travis Close	1.3	\$850	\$1,105	Legal research re: local rule 7-3 cited as grounds for Def's opposition to Plf's request for judicial notice	Pleadings and Motions Re: Pleadings
6/2/2022	Travis Close	0.2	\$850	\$170	Review and analyze Def's opposition to Plf's request for judicial notice	Pleadings and Motions Re: Pleadings
6/2/2022	Travis Close	0.9	\$850	\$765	Cite check authority cited in Def's Opposition to Mtn to Strike opinions of Saad and Jacobson -- pages 6	Pleadings and Motions Re: Pleadings
6/2/2022	Travis Close	1.2	\$850	\$1,020	Legal research re: propriety of rebuttal expert testimony in challenging expert methodology	Pleadings and Motions Re: Pleadings
6/2/2022	Travis Close	0.7	\$850	\$595	Review and analyze Def's opposition to motion to exclude testimony and opinions of Dr Jacobson and Dr Saad	Pleadings and Motions Re: Pleadings
6/2/2022	Travis Close	0.2	\$850	\$170	Review and analyze Brookdale's motion to strike improper attorney declarations	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/3/2022	Guy Wallace	1.1	\$1,350	\$1,485	com's with GCG; BBK; AX; BU; MTJ; TCC re preparation of responses to Defendants' request to continue hearing; replies to motions to exclude certain opinions of Defendants' experts; Defendants' further motions to strike	Class Certification
6/3/2022	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of Defendants' motion to continue hearing on class certification	Class Certification
6/3/2022	Guy Wallace	2.9	\$1,350	\$3,915	review and analysis of Defendants' motions to strike Plaintiffs' attorney declarations; oppositions to motions to exclude Jacobson; Saad; Anderson	Other Motions
6/3/2022	Jennifer Bybee	0.3	\$925	\$278	Email to GBW re Kailes' chart re exclusion of expert testimony	Class Certification
6/3/2022	Jennifer Bybee	4.7	\$925	\$4,348	Review D's Mtn to Exclude June Kailes and P's Opposition and draft comparison chart re same; email to GBW re same	Class Certification
6/3/2022	Mark Johnson	0.5	\$1,150	\$575	zoom team mtg w/ GBW, GCG, AX, JY, BU, TCC re allocation of work for reply to opposition to exclude Saad, Anderson and Jacobsen opinions, opp to mtn to exclude attry decs and response to mtn for continuance, prep for hearing	Case Organization, Planning and Strategy
6/3/2022	Mark Johnson	2.4	\$1,150	\$2,760	review and analyze D opposition to mtn to exclude Saad and Jacobsen opinions.	Other Motions
6/3/2022	Mark Johnson	5.0	\$1,150	\$5,750	work on reply to opposition to mtn to exclude Anderson opinions	Other Motions
6/3/2022	Mark Johnson	0.3	\$1,150	\$345	call w GBW re reply iso mtn to exclude Anderson declaration	Other Motions
6/3/2022	Travis Close	0.6	\$850	\$510	Meet with LEC re: assignments for next week's filings	Case Organization, Planning and Strategy
6/3/2022	Travis Close	1.8	\$850	\$1,530	Review, analyze, and take notes on Def's oppositon to motion to strike douglas andersons' certain testimony	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/3/2022	Travis Close	0.3	\$850	\$255	Email to MTJ re: outline of reply iso motion to strike Anderson testimony	Case Organization, Planning and Strategy
6/3/2022	Travis Close	0.5	\$850	\$425	Review and analyze docs provided by Anderson to determine authority for "prototypes" and owners/managers opinions	Experts (Including Retention)
6/3/2022	Travis Close	0.6	\$850	\$510	Team meeting re: apportioning work for briefs due next week; discussing hearings and oral argument	Pleadings and Motions Re: Pleadings
6/3/2022	Travis Close	0.8	\$850	\$680	Review and analyze Plf's motion to exclude certain testimony from Douglas Anderson	Pleadings and Motions Re: Pleadings
6/3/2022	Travis Close	0.6	\$850	\$510	Call with MTJ re: assignments for assisting with reply iso motion to strike certain anderson testimony	Pleadings and Motions Re: Pleadings
6/3/2022	Travis Close	2.2	\$850	\$1,870	Draft outline for Reply iso Motion to Strike certain testimony of Douglas Anderson	Pleadings and Motions Re: Pleadings
6/4/2022	Guy Wallace	0.3	\$1,350	\$405	com's with JAU re preparation for class certification hearing	Class Certification
6/4/2022	Guy Wallace	4.4	\$1,350	\$5,940	preparation and drafting of opposition to Defendants' motion to continue hearing on class certification	Other Motions
6/4/2022	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ re reply brief re motion to exclude Anderson	Other Motions
6/4/2022	Jennifer Bybee	1.6	\$925	\$1,480	Review Defendants' Reply iso motion to exclude Kailes and include relevant info from same in chart; email same to GBW	Class Certification
6/4/2022	Jennifer Bybee	1.5	\$925	\$1,388	Revise June Kailes Chart based on com's with GBW; email GBW draft of same	Class Certification
6/4/2022	Jennifer Bybee	2.9	\$925	\$2,683	Review J. Kailes testimony and add relevant sections of same to chart re Mtn. to Exclude J. Kailes testimony / declaration	Class Certification
6/4/2022	Mark Johnson	0.9	\$1,150	\$1,035	calls (x2) w/ GBW re Ds oppositions to mtns to exclude Anderson, Saad and Jacobsen opiions and strategy for response to same in reply	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/4/2022	Mark Johnson	5.8	\$1,150	\$6,670	work on reply iso mtn to exclude Anderson opinions.	Other Motions
6/5/2022	Guy Wallace	4.4	\$1,350	\$5,940	preparation and drafting of opposition to Defendants' motion to continue class certification hearing	Other Motions
6/5/2022	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of Defendants' opposition to motion to exclude opinions of Drs. Jacobson and Saad	Other Motions
6/5/2022	Guy Wallace	1.1	\$1,350	\$1,485	com's with DTM; JT; BU; MTJ re preparation of reply brief re motion to exclude opinions of Drs. Jacobson and Saad	Other Motions
6/5/2022	Guy Wallace	0.5	\$1,350	\$675	legal research and analysis re requirements of Rule 26 do not apply to declarations proffered by experts at class certification	Other Motions
6/5/2022	Jennifer Bybee	0.8	\$925	\$740	Finish reviewing deposition testimony of J. Kailes and adding relevant sections to chart	Class Certification
6/5/2022	Jennifer Bybee	0.9	\$925	\$833	Review Kailes Decl and Ex. 42 and D's Mtn and add relevant info to chart re Mtn to Exclude Kailes	Class Certification
6/5/2022	Jennifer Bybee	1.0	\$925	\$925	Review Kailes' Reply Decl iso P's MCC and add relevant sections to chart re Mtn to Exclude Kailes	Class Certification
6/5/2022	Jennifer Bybee	0.2	\$925	\$185	Draft list of questions re June Kailes; email same and chart to GBW	Class Certification
6/5/2022	Jennifer Bybee	1.6	\$925	\$1,480	Create chart for D. Cross; review D's Mtn. to Exclude Expert Testimony / Decl. of D. Cross and add relevant info to chart	Class Certification
6/5/2022	Jennifer Bybee	1.2	\$925	\$1,110	Review Opp. to Mtn. to Exclude Cross and include relevant sections in chart	Class Certification
6/5/2022	Mark Johnson	1.5	\$1,150	\$1,725	team call w GBW, BU, D Marks, J Thornton to discuss issues for reply iso mtn to exclude opinions from Saad and Jacobsen	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/5/2022	Mark Johnson	0.7	\$1,150	\$805	review opp to mtn to exclude Saad, Jacobsen opiniiions to ID issues for discussion in team mtg; email COC re same	Other Motions
6/5/2022	Mark Johnson	4.5	\$1,150	\$5,175	work on reply iso mtn to exclude Anderson opinions	Other Motions
6/5/2022	Travis Close	0.3	\$850	\$255	Email to MTJ re: helpful language in Elosu v. Middlefork Ranch case for Anderson reply motion to strike	Case Organization, Planning and Strategy
6/5/2022	Travis Close	2.2	\$850	\$1,870	Continue drafting response to Def's opposition to motion to strike Anderson testimony -- Distinguishing cases cited in Def's brief for for argument that evidentiary basis cannot be challenged under Daubert	Case Organization, Planning and Strategy
6/5/2022	Travis Close	0.4	\$850	\$340	Review and analyze summary by GBW on Daubert standards	Pleadings and Motions Re: Pleadings
6/6/2022	Guy Wallace	0.9	\$1,350	\$1,215	preparation and drafting of opposition to Defendants' motion to continue hearing on class certification	Other Motions
6/6/2022	Guy Wallace	0.3	\$1,350	\$405	com's with BU re reply brief re motion to exclude testimony of Dr. Jacobson and Dr. Saad	Other Motions
6/6/2022	Guy Wallace	0.6	\$1,350	\$810	legal research and analysis re legal standards for equivalent access; com's with MTJ re same	Other Motions
6/6/2022	Guy Wallace	3.4	\$1,350	\$4,590	revise and edit opposition to Defendants' motion to continue hearing on class certification; com's with JY; MTJ re same	Other Motions
6/6/2022	Jennifer Bybee	0.3	\$925	\$278	Email to RLS re Mtn to Exclude chart assignment	Class Certification
6/6/2022	Jennifer Bybee	1.6	\$925	\$1,480	Review Opposition and Reply Mtms re Motion to Exclude D. Cross; add relevant info to chart re same	Class Certification
6/6/2022	Jennifer Bybee	1.6	\$925	\$1,480	Review Reply Decl. and include relevant info into chart re Mtn. to Exclude D. Cross	Class Certification
6/6/2022	Mark Johnson	0.5	\$1,150	\$575	review and add to draft opposition to mtn to continue hearing; com w/ GBW re same	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/6/2022	Mark Johnson	7.0	\$1,150	\$8,050	continue working on reply iso mtn to exclude Anderson opinions	Other Motions
6/6/2022	Rachel Steyer	0.4	\$750	\$300	received call from daughter of current resident, responding to missed call, discussed case, determined not a good fit	Class Outreach and Contact
6/6/2022	Rachel Steyer	3.0	\$750	\$2,250	preparing chart of expert witness for GBW	Experts (Including Retention)
6/6/2022	Travis Close	0.6	\$850	\$510	Meet with MTJ re: tasks for reply iso motion to Strike Anderson declaration	Case Organization, Planning and Strategy
6/6/2022	Travis Close	0.4	\$850	\$340	Meet with LEC re: filing tasks for this week	Case Organization, Planning and Strategy
6/6/2022	Travis Close	1.4	\$850	\$1,190	Analysis of chart from Dr. Anderson declaration -- compare to original and revised reports from Mastin and Waters	Pleadings and Motions Re: Pleadings
6/6/2022	Travis Close	1.8	\$850	\$1,530	Create revised chart based on chart from Anderson Declaration addressing whether that facility was mentioned in mastin/waters declaration and date of construction	Pleadings and Motions Re: Pleadings
6/6/2022	Travis Close	0.3	\$850	\$255	Review and analyze Plfs' response to motion to continue hearing on class cert	Pleadings and Motions Re: Pleadings
6/6/2022	Travis Close	0.4	\$850	\$340	Email to MTJ summarizing evidence found re: excluding expert testimony where it's untethered to facts of case	Pleadings and Motions Re: Pleadings
6/6/2022	Travis Close	1.7	\$850	\$1,445	legal research re: cases elaborating on Rule 702's requirement for "sufficient facts or data" - Ninth circuit appellate cases	Pleadings and Motions Re: Pleadings
6/6/2022	Travis Close	1.9	\$850	\$1,615	legal research re: cases elaborating on Rule 702's requirement for "sufficient facts or data" - Ninth circuit district court cases	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/7/2022	Guy Wallace	0.7	\$1,350	\$945	team zoom with GCG; JY; BBK; AX; KS; BU; MTJ; TCC; RLS re preparation for class certification hearing and further briefings re evidentiary submissions re same	Class Certification
6/7/2022	Guy Wallace	3.4	\$1,350	\$4,590	review and analysis of Defendants' opposition to motion to exclude opinions of Drs. Jacobson and Saad	Other Motions
6/7/2022	Guy Wallace	3.3	\$1,350	\$4,455	preparation of notes and questions re Defendants' opposition to motion to exclude Jacobson and Saad; com's with MTJ; BU re same and revisions to draft of reply brief	Other Motions
6/7/2022	Guy Wallace	1.7	\$1,350	\$2,295	review and analysis of Defendants' opposition to motion to exclude Anderson testimony	Other Motions
6/7/2022	Guy Wallace	2.1	\$1,350	\$2,835	revise and edit draft of reply brief re motion to exclude opinions of Anderson	Other Motions
6/7/2022	Jennifer Bybee	1.3	\$925	\$1,203	Review Mtn to Exclude Mastin & Waters and include relevant sections in chart	Appeal
6/7/2022	Jennifer Bybee	3.0	\$925	\$2,775	Review D. Cross deposition testimony and include relevant info in chart re motion to exclude his testimony and declaration	Class Certification
6/7/2022	Jennifer Bybee	0.1	\$925	\$93	Email D. Cross chart and questions to GBW	Class Certification
6/7/2022	Jennifer Bybee	0.2	\$925	\$185	Begin chart for P. Kennedy	Class Certification
6/7/2022	Mark Johnson	2.5	\$1,150	\$2,875	continue drafting reply iso mtn to exclude Anderson opinions; review cases identified by TCC for same, com w/ COC re same	Other Motions
6/7/2022	Mark Johnson	2.4	\$1,150	\$2,760	edit and add to latest draft of reply iso mtn to exclude Saad/Jacobsen opinions and coms w/ OC re same	Other Motions
6/7/2022	Mark Johnson	0.3	\$1,150	\$345	calls x2 w/ GBW e reply declarations iso mtn to exclude Anderson, Saad, Jacobsen opinions	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/7/2022	Rachel Steyer	0.4	\$750	\$300	weekly meeting with RBGG and BSU co-counsel to discuss outstanding tasks before class cert hearing	Case Organization, Planning and Strategy
6/7/2022	Rachel Steyer	0.3	\$750	\$225	follow up call with daughter of current resident, wanted to update us about her father's current condition, added notes to intake file	Class Outreach and Contact
6/7/2022	Rachel Steyer	5.7	\$750	\$4,275	reviewing expert materials, updating chart for GBW	Experts (Including Retention)
6/7/2022	Rachel Steyer	0.5	\$750	\$375	reviewing and editing MTJ draft reply ISO motion to exclude defendants' access expert opinion	Other Motions
6/7/2022	Travis Close	1.6	\$850	\$1,360	Legal research re: recent cases filed in California v. Brookdale	Class Certification
6/7/2022	Travis Close	1.4	\$850	\$1,190	Legal research re: rent cases files against Brookdale in federal court alleging misrepresentation of staffing services (Superiority)	Class Certification
6/7/2022	Travis Close	0.5	\$850	\$425	Review and analyze latest CDSS investigation reports (complaint investigation and facility access) published for Irvine, Roseville, Murietta, Folsom, and Claremont facilities	Discovery (Non-Deposition)
6/7/2022	Travis Close	0.5	\$850	\$425	team meeting re: replies to motion to strike; strategy for oral argument	Pleadings and Motions Re: Pleadings
6/7/2022	Travis Close	1.1	\$850	\$935	Review, analyze and revise draft reply to Anderson motion to exclude	Pleadings and Motions Re: Pleadings
6/7/2022	Travis Close	1.3	\$850	\$1,105	Quantification of ADAAG barriers in Mastin and Waters' reports for Anderson MTS reply	Pleadings and Motions Re: Pleadings
6/7/2022	Travis Close	0.6	\$850	\$510	Cite-checking reply iso motion to strike certain opinions in Anderson declaration	Pleadings and Motions Re: Pleadings
6/8/2022	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ re revisions to draft of reply brief re motion to exclude opinions of Anderson	Class Certification
6/8/2022	Guy Wallace	0.5	\$1,350	\$675	com's with GG; MTJ re Defendants' request (from Rutner) for further continuance on hearing on class certification	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/8/2022	Guy Wallace	2.9	\$1,350	\$3,915	revise and edit reply brief re motion to exclude Anderson opinions	Other Motions
6/8/2022	Guy Wallace	1.6	\$1,350	\$2,160	review and analysis of further draft of reply brief re motion to exclude opinions of Jacobson and Saad; com's with MTJ; BU re same	Other Motions
6/8/2022	Guy Wallace	0.4	\$1,350	\$540	review and analysis of draft response from BBK re Defendants' opposition to request for judicial notice of documents	Other Motions
6/8/2022	Jennifer Bybee	1.7	\$925	\$1,573	Review Plaintiffs' Opposition to D's Mtn. to Exclude Mastin & Waters and add relevant sections to chart re same	Class Certification
6/8/2022	Mark Johnson	0.8	\$1,150	\$920	calls (x4) w GBW re court continuance of hearing, Ds request for further continuance and strategy for response to same, meet and confer w/ OC re confidentiality designations and TCC lead, reply declarations iso mtns to exclude Anderson, Saad and Jacobsen declarations	Class Certification
6/8/2022	Mark Johnson	0.3	\$1,150	\$345	com w/ TCC re meet and confer strategy for confidential designations	Discovery (Non-Deposition)
6/8/2022	Mark Johnson	0.1	\$1,150	\$115	email to OC re meeting and conferring re confidentiality designations	Discovery (Non-Deposition)
6/8/2022	Mark Johnson	0.3	\$1,150	\$345	review MJ declaration iso of sealng documents to determine scope of proposed sealng, inclusion of Anderson depo passages, exhibits, Saad and Jacobsen depo excerpts; com w/ COC re same	Other Motions
6/8/2022	Mark Johnson	1.0	\$1,150	\$1,150	review and edit revised draft of reply iso mtn to exclude Anderson opinions.	Other Motions
6/8/2022	Mark Johnson	0.5	\$1,150	\$575	review draft opp to mtn to strike RJN; com w BBK re same	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/8/2022	Mark Johnson	0.8	\$1,150	\$920	review and edit revised draft of reply iso mtn to exclude Jacobsen / Saad declarations; email to COC BU, DM re same	Other Motions
6/8/2022	Mark Johnson	0.4	\$1,150	\$460	calls and emails w/ TCC re revisions to reply iso mtn to exclude Anderson opinions	Other Motions
6/8/2022	Mark Johnson	0.8	\$1,150	\$920	review of new draft of reply iso mtn to exclude Saad/Jacobsen opinions	Other Motions
6/8/2022	Rachel Steyer	0.3	\$750	\$225	call with declarant to discuss authorization forms, wanted to provide update to her mother's status, added notes to intake	Discovery (Non-Deposition)
6/8/2022	Travis Close	1.4	\$850	\$1,190	Legal research re: definition of confidential informaiton	Case Organization, Planning and Strategy
6/8/2022	Travis Close	0.4	\$850	\$340	Review and analyze Plfs' reply iso request for judicial notice	Case Organization, Planning and Strategy
6/8/2022	Travis Close	0.7	\$850	\$595	Call with MTJ re: preparing for tomorrow's call on confidentiality designationsw	Case Organization, Planning and Strategy
6/8/2022	Travis Close	0.2	\$850	\$170	Email to MTJ, GBW re: cite checked version of Anderson reply brief for review	Case Organization, Planning and Strategy
6/8/2022	Travis Close	1.7	\$850	\$1,445	Analyze provisions of protective order, FRCP, and correspondence w/ Defendants re: confidentiality designations	Discovery (Non-Deposition)
6/8/2022	Travis Close	1.8	\$850	\$1,530	Prepare for tomorrow's M/C call -- analysis of designations marked by Defs as confidential that Ps are challenging	Discovery (Non-Deposition)
6/8/2022	Travis Close	1.7	\$850	\$1,445	Review, analyze and revise latest draft of reply iso motion to strike Anderson testimony -- cite checking and proofreading	Pleadings and Motions Re: Pleadings
6/9/2022	Guy Wallace	1.2	\$1,350	\$1,620	preparation for hearing on class certification	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/9/2022	Guy Wallace	0.6	\$1,350	\$810	com's with Rutner; GCG; MTJ re schedule on hearing of motion for class certification; review and analysis of Defendants' motion re same; withdrawal of motion; proposed stipulation re same	Class Certification
6/9/2022	Guy Wallace	3.7	\$1,350	\$4,995	revise and edit final draft of reply brief re motion to exclude Anderson's opinions	Other Motions
6/9/2022	Guy Wallace	2.7	\$1,350	\$3,645	revise and edit draft of reply brief re motion to exclude opinions of Drs. Jacobson and Saad; com's with DTM; BU; MTJ re same	Other Motions
6/9/2022	Guy Wallace	0.6	\$1,350	\$810	preparation of reply brief re motion to exclude opinions of Drs. Jacobson and Saad; com's with DTM; BU; LEC re same	Other Motions
6/9/2022	Jennifer Bybee	0.7	\$925	\$648	Review D's Reply Mtn i/s/o Mtn. to Exclude Mastin & Waters and include relevant info in chart re same	Class Certification
6/9/2022	Jennifer Bybee	1.0	\$925	\$925	Review Mastin Decl and add relevant parts to Mtn. to Exclude his expert testimony	Class Certification
6/9/2022	Mark Johnson	0.5	\$1,150	\$575	call w/ TCC re issues and strategy for meet and confer w/ OC re confidentiality desi	Discovery (Non-Deposition)
6/9/2022	Mark Johnson	0.6	\$1,150	\$690	calll w/ TCC and OC Jacobsen, Bertino re confidentiality designations	Discovery (Non-Deposition)
6/9/2022	Mark Johnson	0.1	\$1,150	\$115	call w GBW re results of meet and confer w/ OC re confidentiality designations	Discovery (Non-Deposition)
6/9/2022	Rachel Steyer	1.0	\$750	\$750	updating and drafting MTJ letter to OC requesting declarant resident files	Communications With Opposing Counsel
6/9/2022	Travis Close	0.7	\$850	\$595	Analyze Def's confidentiality designations of Ali Saad transcript in prep for today's M/C with Defendants	Case Organization, Planning and Strategy
6/9/2022	Travis Close	0.3	\$850	\$255	Call with MTJ re prep for today's call with Defendants	Case Organization, Planning and Strategy
6/9/2022	Travis Close	0.4	\$850	\$340	Review and analyze final, filed version (with tables) of Plfs' reply iso motion to strike Anderson testimony	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/9/2022	Travis Close	0.2	\$850	\$170	Review and analyze draft stipulation by Rutner to continue hearing	Case Organization, Planning and Strategy
6/9/2022	Travis Close	0.9	\$850	\$765	Follow-up legal research re: how trade secrets are protected and asserted (re confidentiality designations)	Case Organization, Planning and Strategy
6/9/2022	Travis Close	0.6	\$850	\$510	Call with MTJ, Defendants re: challenging confidentiality designations	Communications With Opposing Counsel
6/9/2022	Travis Close	1.5	\$850	\$1,275	Legal research re: whether methodologies of experts may be properly designated as confidential	Communications With Opposing Counsel
6/9/2022	Travis Close	0.7	\$850	\$595	Analyze Def's confidentiality designations of Sheldon Jacobson transcript	Discovery (Non-Deposition)
6/9/2022	Travis Close	0.3	\$850	\$255	Call with MTJ re: debrief after M/C with deendants on confidentiality designations	Discovery (Non-Deposition)
6/9/2022	Travis Close	1.2	\$850	\$1,020	Analyze provisions of local rules re: sealing and confidentiality	Pleadings and Motions Re: Pleadings
6/9/2022	Travis Close	0.2	\$850	\$170	Review and analyze Def's motion to continue hearing	Pleadings and Motions Re: Pleadings
6/9/2022	Travis Close	0.3	\$850	\$255	Review and analyze latest version of Plf's reply iso request for judicial notice	Pleadings and Motions Re: Pleadings
6/10/2022	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re hearing prep	Class Certification
6/10/2022	Jennifer Bybee	1.4	\$925	\$1,295	Review Mastin Reply Decl iso MCC and Mastin Deposition testimony and include relevant parts in chart	Class Certification
6/10/2022	Rachel Steyer	0.4	\$750	\$300	received call from putative class member, discussed case, made a few notes in sharepoint concerning her issues	Class Outreach and Contact
6/10/2022	Rachel Steyer	0.8	\$750	\$600	revising MTJ letter and preparing email to MTJ with declarant authorization forms and POA docs to submit to opposing counsel	Communications With Opposing Counsel

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/10/2022	Rachel Steyer	0.5	\$750	\$375	drafting second batch of MTJ letter to opposing counsel, preparing authorization docs and POA in email	Communications With Opposing Counsel
6/10/2022	Travis Close	1.6	\$850	\$1,360	Legal research re: other ADA cases filed against brookdale in federal court (superiority question)	Case Organization, Planning and Strategy
6/10/2022	Travis Close	1.1	\$850	\$935	Analyze communications with architectural experts for record of when construction dates for facilities were determined and whether they changed before/after august of 2021	Case Organization, Planning and Strategy
6/10/2022	Travis Close	0.5	\$850	\$425	Legal research re: FRCP 403's use in Daubert motions	Case Organization, Planning and Strategy
6/10/2022	Travis Close	0.9	\$850	\$765	Analysis of testimony by Dr. Saad about his familiarity and prior experience with "benchmarks"	Depositions
6/10/2022	Travis Close	0.6	\$850	\$510	Review and analyze Plf's reply iso motion to exclude testimony of Jacobson and Saad	Pleadings and Motions Re: Pleadings
6/10/2022	Travis Close	1.8	\$850	\$1,530	Analysis of Def's testimony by Anderson, Jacobson and Saad marked as confidential vs. requests for redactions in filings	Pleadings and Motions Re: Pleadings
6/12/2022	Guy Wallace	2.6	\$1,350	\$3,510	preparation for hearing on class certification and related motions	Class Certification
6/12/2022	Jennifer Bybee	1.3	\$925	\$1,203	Review Mastin deposition testimony and include relevant info in chart re motion to exclude	Class Certification
6/13/2022	Guy Wallace	0.9	\$1,350	\$1,215	legal research and analysis re case law re "benefit of the bargain" defense post-Hinojos	Class Certification
6/13/2022	Jennifer Bybee	2.4	\$925	\$2,220	Review J Mastin deposition testimony and include relevant sections in chart re motion to exclude	Class Certification
6/13/2022	Rachel Steyer	0.2	\$750	\$150	call with family member of former resident, requested update about status of case	Class Outreach and Contact
6/13/2022	Rachel Steyer	0.6	\$750	\$450	call with declarant to review and discuss language in authorization docs	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/13/2022	Rachel Steyer	0.3	\$750	\$225	email to MTJ with question about how to proceed with declarant authorization form	Discovery (Non-Deposition)
6/13/2022	Rachel Steyer	0.2	\$750	\$150	call with declarant to clarify revised language in authorization forms	Discovery (Non-Deposition)
6/13/2022	Rachel Steyer	0.3	\$750	\$225	updating language in declarant authorization forms	Discovery (Non-Deposition)
6/13/2022	Rachel Steyer	4.2	\$750	\$3,150	reviewing Schroyer expert materials (deposition, declarations) to work on chart for GBW	Experts (Including Retention)
6/13/2022	Travis Close	0.3	\$850	\$255	Meet with LEC re: filing tasks for this week	Case Organization, Planning and Strategy
6/14/2022	Jennifer Bybee	0.8	\$925	\$740	Finish reviewing J. Mastin deposition testimony and add relevant sections to chart re Mtn. to Exclude	Class Certification
6/14/2022	Jennifer Bybee	1.7	\$925	\$1,573	Review Reply Decl. of J. Mastin and include relevant sections in chart re Mtn. to Exclude; email same to GBW	Class Certification
6/14/2022	Jennifer Bybee	1.0	\$925	\$925	Review G. Waters Declaration and include relevant sections in chart re Motion to Exclude his testimony	Class Certification
6/14/2022	Jennifer Bybee	0.2	\$925	\$185	Review G. Waters deposition testimony and include relevant info in chart re motion to exclude	Class Certification
6/14/2022	Mark Johnson	1.6	\$1,150	\$1,840	review email from OC and email from TCC re revised position on confidentiality designations; review depo transcripts to analyze merits of designation for remaining pages, supplement chart with topic info for same.	Other Motions
6/14/2022	Mark Johnson	0.4	\$1,150	\$460	coms w/ COC re position to take concerning proposed revised designations of confidentiality; revise draft email re same.	Other Motions
6/14/2022	Rachel Steyer	7.3	\$750	\$5,475	continued work on reviewing Schroyer materials (depo transcript, declarations, daubert motions) and updating chart	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/14/2022	Travis Close	0.2	\$850	\$170	Revie and analyze draft stip to accelerate hearings on Ps and Ds' moitions	Case Organization, Planning and Strategy
6/14/2022	Travis Close	1.3	\$850	\$1,105	Review and analyze Defendants' revised designations for Jacobsen and Saad	Case Organization, Planning and Strategy
6/14/2022	Travis Close	0.5	\$850	\$425	Email to MTJ. GBW. RLS re: proposed strategy for responding to Def's updated depo designations/compromise	Case Organization, Planning and Strategy
6/14/2022	Travis Close	0.3	\$850	\$255	Call to LEC re: question about filing errata for confidential designations	Case Organization, Planning and Strategy
6/14/2022	Travis Close	0.9	\$850	\$765	Analysis of withdrawn depo designations for Anderson and Saad; draft proposed response to Defs re: designations	Communications With Opposing Counsel
6/14/2022	Travis Close	1.2	\$850	\$1,020	Review and analyze updated depo transcript designations for Dr Saad	Depositions
6/15/2022	Guy Wallace	1.8	\$1,350	\$2,430	preparation for hearing on motion for class certification	Class Certification
6/15/2022	Guy Wallace	1.3	\$1,350	\$1,755	review and analysis of draft opposition to Defendants' motion to strike reply declarations of GBW; BBK; RLS; revise and edit same; com's with JY; AX re same	Other Motions
6/15/2022	Jennifer Bybee	4.4	\$925	\$4,070	Review deposition testimony of G. Waters and include relevant information in chart re mtn. to exclude	Class Certification
6/15/2022	Jennifer Bybee	0.9	\$925	\$833	Review Waters Reply Decl. and include relevant info in chart re Mtn. to Exclude	Class Certification
6/15/2022	Jennifer Bybee	0.1	\$925	\$93	Finalize G. Waters chart re Mtn to Exclude; email same to GBW	Class Certification
6/15/2022	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW re prep for class cert hearing, ancillary motions, index and collection of filed documents for hearing	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/15/2022	Mark Johnson	0.7	\$1,150	\$805	coms w/ LEC, RLS re index of docs for class cert hearing and prep of same; review initial list from LEC and prior partial index from RLS/RBGG, review docket; draft email to LEC describing project needs.	Class Certification
6/15/2022	Mark Johnson	0.5	\$1,150	\$575	email coms w/ COC re response to OC re confidentiality designations; com w/ TCC re same; edit proposed response; review response from OC	Other Motions
6/15/2022	Mark Johnson	0.5	\$1,150	\$575	review and comment on COC draft of opp to mtn to strike attorney declartions.	Other Motions
6/15/2022	Rachel Steyer	0.2	\$750	\$150	circulating additional documents to prepare binders and papers for class cert hearing to LEC, JUB, TCC, MTJ, GBW, JMP, TBS	Class Certification
6/15/2022	Rachel Steyer	0.3	\$750	\$225	preparing/fixing POA documents received from declarant	Discovery (Non-Deposition)
6/15/2022	Rachel Steyer	5.4	\$750	\$4,050	working on Schroyer chart (reviewing motions, depo transcript, declarations)	Experts (Including Retention)
6/15/2022	Travis Close	1.3	\$850	\$1,105	Analysis of Defendants' Experts testimony that was filed in the public record on Opposition and in Ps' reply papers	Case Organization, Planning and Strategy
6/15/2022	Travis Close	0.3	\$850	\$255	Email to team re: Saad depo testimony Defs' complain is confidential	Case Organization, Planning and Strategy
6/15/2022	Travis Close	0.3	\$850	\$255	Meet with MTJ, LEC re: preparing for class cert hearing next month	Case Organization, Planning and Strategy
6/15/2022	Travis Close	0.4	\$850	\$340	Draft email to opposing counsel responding to offer to withdraw certain designations of confidential testimony	Discovery (Non-Deposition)
6/16/2022	Guy Wallace	2.7	\$1,350	\$3,645	preparation for hearing on motions for class certification and motions to exclude witnesses; com's with MTJ; JAU re same	Class Certification
6/16/2022	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re preparation for class cert hearing	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/16/2022	Jennifer Bybee	2.6	\$925	\$2,405	Review Mtn. to Exclude Cristina Flores and include relevant info in chart re same	Class Certification
6/16/2022	Rachel Steyer	0.2	\$750	\$150	spoke with declarant to provide update about case as requested	Class Outreach and Contact
6/16/2022	Rachel Steyer	6.0	\$750	\$4,500	continuing work on Jacobson expert chart, reviewing depo transcript, declaration, motions to exclude testimony	Experts (Including Retention)
6/16/2022	Travis Close	0.3	\$850	\$255	Email to AXU re: proposed edits to Plfs' opposition to motion to strike attorney declaration	Case Organization, Planning and Strategy
6/16/2022	Travis Close	0.7	\$850	\$595	Review, analyze, and revise draft Plfs' opposition to Defs' motion to strike allegedly improper atty declarations	Pleadings and Motions Re: Pleadings
6/17/2022	Guy Wallace	2.7	\$1,350	\$3,645	preparation for hearing on class certification; com's with MTJ; JUB re same	Class Certification
6/17/2022	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of Defendants' letter re demands for discovery re P's expert reply declarations; com's with MTJ re same	Discovery (Non-Deposition)
6/17/2022	Jennifer Bybee	2.7	\$925	\$2,498	Review Opposition to Mtn. to Exclude Flores and include any relevant info in chart re same	Class Certification
6/17/2022	Jennifer Bybee	0.6	\$925	\$555	Com's with GBW re charts re Motion to Exclude Experts & preparation for class certification hearing	Class Certification
6/17/2022	Jennifer Bybee	0.1	\$925	\$93	Email to RLS re update on status re expert charts	Class Certification
6/17/2022	Jennifer Bybee	1.0	\$925	\$925	Review Flores' Opposition Decl. and include relevant info in chart re same	Class Certification
6/17/2022	Jennifer Bybee	0.1	\$925	\$93	Emails to / from RLS re chart assignment update	Class Certification
6/17/2022	Mark Johnson	0.5	\$1,150	\$575	call w/ GBW re emails from OC concerning RPDs and expert materials; strategy for responding to same, D's strategy for using information.	Case Organization, Planning and Strategy
6/17/2022	Rachel Steyer	7.1	\$750	\$5,325	continuing to work on Jacobson chart (reviewing depo transcript, motions to exclude, declarations)	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/17/2022	Travis Close	0.2	\$850	\$170	Review and analyze Def's letter seeking M/C on responses to Def's second set of requests for production	Discovery (Non-Deposition)
6/17/2022	Travis Close	1.3	\$850	\$1,105	Analyze plaintiffs' disclosures of SAS programs mentioned in Def's letter of june 17	Experts (Including Retention)
6/17/2022	Travis Close	1.7	\$850	\$1,445	Preparation for hearing -- review filings associated with Kailes and Cross motions to strike; outline Ps' and Ds' arguments	Experts (Including Retention)
6/17/2022	Travis Close	0.7	\$850	\$595	Analyze Def's cases in reply iso motion to strike Kailes testimony stating that "accessible" is a term of art	Experts (Including Retention)
6/17/2022	Travis Close	0.8	\$850	\$680	Analyze cases cited in Def's Reply iso motion to strike Kailes testimony for the proposition that Kailes was required to use a "representative" sample of supplemental emergency evacuation plans	Pleadings and Motions Re: Pleadings
6/18/2022	Guy Wallace	3.3	\$1,350	\$4,455	legal research and analysis re Title III of the ADA and coverage of residential care facilities	Class Certification
6/18/2022	Guy Wallace	2.6	\$1,350	\$3,510	preparation for hearing on class certification and related motions	Class Certification
6/18/2022	Jennifer Bybee	3.0	\$925	\$2,775	Review C. Flores Decl and include relevant info in chart re motion to exclude	Class Certification
6/19/2022	Jennifer Bybee	2.0	\$925	\$1,850	Review C. Flores depo testimony and include relevant info in chart re Mtn to Exclude	Class Certification
6/19/2022	Mark Johnson	1.0	\$1,150	\$1,150	review docket and compile info from multiple entries re redactions to opening papers, declarations in support of same; prepare memo describing results and discussion of opening brief	Class Certification
6/20/2022	Guy Wallace	3.3	\$1,350	\$4,455	preparation for hearing on class certification and related motions	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/20/2022	Jennifer Bybee	5.3	\$925	\$4,903	Review C. Flores depo testimony and include relevant sections in chart re Mtn. to Exclude	Class Certification
6/20/2022	Rachel Steyer	0.2	\$750	\$150	response to declarant providing update and clarification about case and class certification status	Class Outreach and Contact
6/21/2022	Guy Wallace	4.8	\$1,350	\$6,480	preparation for hearing on class certification and related motions; review and analysis of Plaintiffs' opening and reply briefs re class certification & analysis of potential areas of inquiry	Class Certification
6/21/2022	Guy Wallace	0.5	\$1,350	\$675	com's with DTM; MTJ re Defendants' demands for further expert discovery and materials	Discovery (Non-Deposition)
6/21/2022	Jennifer Bybee	3.1	\$925	\$2,868	Review C. Flores testimony and D's Mtn. to Exclude and include relevant sections in chart re Mtn. to Exclude	Class Certification
6/21/2022	Mark Johnson	0.3	\$1,150	\$345	call (x2) w/ GBW re D's demand for expert materials and strategy for response to same and proposed call w COC re same	Class Certification
6/21/2022	Mark Johnson	0.3	\$1,150	\$345	email exchanges w/ COC Marks and w/ JY, BU re position on response to D demand for expert materials and discovery responses, plan for call	Class Certification
6/21/2022	Mark Johnson	0.8	\$1,150	\$920	review 2 subsequent revised versions of list of pleadings and exhibits for hearing prep and coms w/ instructions to LEC for further revisions.	Class Certification
6/21/2022	Mark Johnson	2.5	\$1,150	\$2,875	review and catalogue, rename exhibits, pleadings, decs, etc. for hearing prep on mtn for class cert	Class Certification
6/21/2022	Rachel Steyer	7.5	\$750	\$5,625	preparing and working on chart for Saad (reviewing plaintiffs and defendants motions to exclude, declarations, and depo testimony)	Experts (Including Retention)
6/21/2022	Travis Close	0.7	\$850	\$595	Review and analyze latest version of Exhibit List and organizational spreadsheet prepared by LEC for hearing	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/21/2022	Travis Close	1.5	\$850	\$1,275	Legal research re: whether "full and equal access" is a legal term of art (prep for MTS Kailes hearing)	Class Certification
6/21/2022	Travis Close	0.5	\$850	\$425	Analyze recent complaint investigation reports and facility evaluation reports issued by California DSS for Paulin Creek, Tracy, Mirage Inn, and Riverwalk facilities	Discovery (Non-Deposition)
6/22/2022	Guy Wallace	3.8	\$1,350	\$5,130	review and analysis of class certification briefs; preparation for hearing on class certification and argument notes re same	Class Certification
6/22/2022	Guy Wallace	3.4	\$1,350	\$4,590	review and analysis of briefs re class certification; preparation of notes and questions re same; preparation for hearing on class certification; com's with MTJ re same (.3)	Class Certification
6/22/2022	Guy Wallace	0.7	\$1,350	\$945	prepare for and participate in com's with DTM; JT; JY; BU; MTJ re Defendants' demands for additional expert materials	Discovery (Non-Deposition)
6/22/2022	Jennifer Bybee	3.6	\$925	\$3,330	Review remainder of C. Flores deposition testimony and include relevant info in chart re Mtn. to Exclude; review sections of C. Flores Declarations and D's Mtn. to Exclude when necessary	Class Certification
6/22/2022	Jennifer Bybee	0.9	\$925	\$833	Review C. Flores Reply Decl. & include relevant info in chart re Mtn. to Exclude	Class Certification
6/22/2022	Jennifer Bybee	0.1	\$925	\$93	Email GBW re Belson & Jones	Class Certification
6/22/2022	Mark Johnson	0.5	\$1,150	\$575	call w/ RLS, LEC, JP, TCC re preparation of exhibit folder, extraction of docs, list of exhibits for hearing	Class Certification
6/22/2022	Mark Johnson	0.4	\$1,150	\$460	call w/ Tyler Smith re strategy and mechanics for linking exhibits to exhibit list for access to exhibits at hearing.	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/22/2022	Mark Johnson	0.7	\$1,150	\$805	calls x2 w GBW re preparation of exhibits and exhibit list for hearing on class cert, evidence and arguments for hearing, position re D demand for expert materials.	Class Certification
6/22/2022	Mark Johnson	3.8	\$1,150	\$4,370	work on review, extraction and organization of exhibits for class cert hearing.	Class Certification
6/22/2022	Mark Johnson	0.5	\$1,150	\$575	call w/ COC re D demand for responses to RFPs and expert materials - GBW, JY, DM, JT, BU	Discovery (Non-Deposition)
6/22/2022	Mark Johnson	0.4	\$1,150	\$460	review responses to D's 2nd set of document requests for call w/ COC re meeting and conferring re same.	Discovery (Non-Deposition)
6/22/2022	Rachel Steyer	0.6	\$750	\$450	meeting with MTJ, LEC, TCC, JMP to review and discuss document organization in prep for class cert hearing	Class Certification
6/22/2022	Rachel Steyer	0.5	\$750	\$375	response to GBW answering question about percent of current/former Brookdale happy campers	Class Certification
6/22/2022	Rachel Steyer	1.8	\$750	\$1,350	working on Saad chart (reviewing depo transcript, declarations, motions)	Experts (Including Retention)
6/22/2022	Travis Close	0.6	\$850	\$510	Meeting with RLS, MTJ, LEC, and JMP re: organization for class cert hearing	Case Organization, Planning and Strategy
6/22/2022	Travis Close	1.7	\$850	\$1,445	Doc organization for Class Cert hearing -- Exhibits to Wallace Decl., #s 51-60	Case Organization, Planning and Strategy
6/22/2022	Travis Close	0.7	\$850	\$595	Analyze updated file organization spreadsheet for class cert hearing	Case Organization, Planning and Strategy
6/22/2022	Travis Close	0.8	\$850	\$680	Doc organization for Class Cert hearing -- Exhibits to Wallace Reply Decl., Nos. 61-75	Case Organization, Planning and Strategy
6/22/2022	Travis Close	0.9	\$850	\$765	Doc organization for Class Cert hearing -- Exhibits to Wallace Reply Decl., Nos. 76-88	Case Organization, Planning and Strategy
6/22/2022	Travis Close	0.8	\$850	\$680	Doc organization for Class Cert hearing -- Exhibits to Wallace Reply Decl., Nos. 89-100	Case Organization, Planning and Strategy
6/22/2022	Travis Close	0.9	\$850	\$765	Doc organization for Class Cert hearing -- Exhibits to Wallace Reply Decl., Nos. 101-110	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/23/2022	Guy Wallace	0.6	\$1,350	\$810	com's with JAU re preparation for hearing on class certification and related motions; issues re Dr. Flores testimony	Class Certification
6/23/2022	Guy Wallace	0.3	\$1,350	\$405	com's with co-counsel re preparation tasks re fact record and hearing on class certification	Class Certification
6/23/2022	Guy Wallace	1.3	\$1,350	\$1,755	legal research and analysis re Supreme Court and Ninth Circuit precedents re Defendants' argument that it is Plaintiffs' burden to show that all class members are injured as of the time of class certification; Teamsters; Olean; Torres; Rodriguez; Armstrong v. Davis	Class Certification
6/23/2022	Guy Wallace	3.2	\$1,350	\$4,320	preparation for hearing on class certification and related motions; review and analysis of court order re a single attorney per side to argue all motions	Class Certification
6/23/2022	Guy Wallace	0.7	\$1,350	\$945	legal research and analysis re district court decisions referencing the Ninth Circuit's en banc decision in Olean	Class Certification
6/23/2022	Jennifer Bybee	0.6	\$925	\$555	Com's with GBW re Flores simple math analysis & class cert hearing prep	Class Certification
6/23/2022	Jennifer Bybee	2.0	\$925	\$1,850	Review C. Flores' Reply Decl and include relevant parts in chart re Mtn. to Exclude	Class Certification
6/23/2022	Jennifer Bybee	1.1	\$925	\$1,018	Review Mtn. to Exclude Kennedy and include relevant sections in chart re same	Class Certification
6/23/2022	Mark Johnson	6.0	\$1,150	\$6,900	prep for class cert hearing - extract, rename and save exhibits for reference at hearing; coms w/ COC, staff re same	Class Certification
6/23/2022	Mark Johnson	1.8	\$1,150	\$2,070	prep for class cert hearing - prepare list of undisputed / admitted facts re access claim	Class Certification
6/23/2022	Mark Johnson	0.5	\$1,150	\$575	review D reply brief iso mtn to strike attorney declarations	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/23/2022	Rachel Steyer	0.2	\$750	\$150	answering question for GBW about info about Brookdale payments	Class Certification
6/23/2022	Rachel Steyer	1.3	\$750	\$975	double cheking and updating MTJ hearing prep folder accordingly	Class Certification
6/23/2022	Rachel Steyer	4.2	\$750	\$3,150	continuing to work on Dr. Saad chart, reviewing depo transcript, declarations, motoins	Experts (Including Retention)
6/23/2022	Travis Close	1.0	\$850	\$850	Draft list of indisuputed facts applicable to Emergency Evacuation and Accessible Transportation issues	Case Organization, Planning and Strategy
6/24/2022	Guy Wallace	2.9	\$1,350	\$3,915	preparation of argument for hearing on class certification, including argument notes	Class Certification
6/24/2022	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re preparation for MCC hearing; preparation of analysis of evidence re same	Class Certification
6/24/2022	Guy Wallace	0.7	\$1,350	\$945	com's with JAU; RLS re preparation for MCC hearing; preparation of analysis of evidence re same	Class Certification
6/24/2022	Guy Wallace	3.4	\$1,350	\$4,590	preparation of argument notes for MCC hearing	Class Certification
6/24/2022	Jennifer Bybee	2.2	\$925	\$2,035	Review Opp. to Mtn. to Exclude Kennedy and include relevant portions in chart re same	Class Certification
6/24/2022	Jennifer Bybee	1.3	\$925	\$1,203	Review Reply to Mtn. to exclude Kennedy and include relevant portions in chart re same	Class Certification
6/24/2022	Jennifer Bybee	1.4	\$925	\$1,295	Review Kennedy Decl. iso MCC and include relevant portions in chart re Mtn. to Exclude	Class Certification
6/24/2022	Jennifer Bybee	1.1	\$925	\$1,018	Review Kennedy Reply Decl and include relevant portions in chart re Mtn. to Exclude	Class Certification
6/24/2022	Jennifer Bybee	0.4	\$925	\$370	Review P. Kennedy deposition testimony and include relevant portions in chart re Mtn. to Exclude.	Class Certification
6/24/2022	Rachel Steyer	0.2	\$750	\$150	call with GBW to discuss finalizing expert charts	Experts (Including Retention)
6/24/2022	Rachel Steyer	6.4	\$750	\$4,800	working on Anderson chart (reviewing motions to exclude, declaration, depo testimony)	Experts (Including Retention)
6/24/2022	Travis Close	1.9	\$850	\$1,615	Continue drafting undisputed facts related to findings by June Kailes / Emergency Evacuation & Planning	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/24/2022	Travis Close	2.2	\$850	\$1,870	Continue drafting undisputed facts related to findings by Douglas Cross / Accessible Transportation & the Fleet Safety Policy	Case Organization, Planning and Strategy
6/24/2022	Travis Close	0.2	\$850	\$170	Email to team re: edits to Undisputed Facts document	Case Organization, Planning and Strategy
6/24/2022	Travis Close	1.0	\$850	\$850	Analyze depo transcript of Kevin Bowman for undisputed facts related to accessible transportation and emergency evacuation	Case Organization, Planning and Strategy
6/24/2022	Travis Close	0.3	\$850	\$255	Review and analyze draft table of undisputed facts by MTJ	Class Certification
6/24/2022	Travis Close	1.5	\$850	\$1,275	Analyze depo transcripts of Brookdale's Executive Directors Kimia Ataein, Therea Ward, Marie Harrie for undisputed facts re: accessible transportation and emergency evacuation	Pleadings and Motions Re: Pleadings
6/25/2022	Guy Wallace	5.6	\$1,350	\$7,560	preparation of argument notes for hearing on MCC and related motions; com's with MTJ; JAU; RLS re same (.7)	Class Certification
6/25/2022	Jennifer Bybee	0.3	\$925	\$278	Com's with GBW re expert charts	Class Certification
6/25/2022	Jennifer Bybee	0.3	\$925	\$278	Email to MTJ re expert charts	Class Certification
6/25/2022	Jennifer Bybee	0.7	\$925	\$648	Edit and add to Flores chart and email same to MTJ	Class Certification
6/25/2022	Jennifer Bybee	0.4	\$925	\$370	Email to MTJ and GBW re Flores task times and frequencies	Class Certification
6/25/2022	Jennifer Bybee	0.3	\$925	\$278	Com's with MTJ re Schroyer, Flores, etc.	Class Certification
6/25/2022	Jennifer Bybee	2.7	\$925	\$2,498	Review deposition testimony of P. Kennedy and include relevant sections in chart re Mtn. to Exclude	Class Certification
6/25/2022	Rachel Steyer	1.9	\$750	\$1,425	finalizing Anderson chart	Experts (Including Retention)
6/26/2022	Guy Wallace	4.2	\$1,350	\$5,670	preparation of argument notes re MCC and related motions; com's with MTJ re same (.5)	Class Certification
6/26/2022	Jennifer Bybee	2.8	\$925	\$2,590	Edit and revise Kennedy chart re Mtn. to Exclude	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/27/2022	Guy Wallace	5.3	\$1,350	\$7,155	preparation of argument notes for hearing on MCC and related issues; review and analysis of summaries re testimony of Dr. Flores; Kailes	Class Certification
6/27/2022	Jennifer Bybee	2.9	\$925	\$2,683	Review D. Belson Reply decl. and create chart re same	Class Certification
6/27/2022	Mark Johnson	8.0	\$1,150	\$9,200	continue preparing analysis of arguments and evidence re Flores, Schroyer, Saad and Jacobsen for oral argument on class cert and motions to exclude declarations.	Class Certification
6/27/2022	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW re class cert argument	Class Certification
6/27/2022	Rachel Steyer	0.3	\$750	\$225	reviewing sheet of undisputed facts compiled by RBGG, TCC, MTJ	Class Certification
6/27/2022	Rachel Steyer	0.2	\$750	\$150	reviewing additional undisputed facts added by BSU concerning Flores staffing to chart	Class Certification
6/27/2022	Rachel Steyer	0.2	\$750	\$150	call with current resident, she wanted to provide me with an update of ongoing issues she's been having	Class Outreach and Contact
6/27/2022	Rachel Steyer	5.3	\$750	\$3,975	finalizing Schroyer chart (reviewing depo transcript, motions, declarations, exhibits)	Experts (Including Retention)
6/27/2022	Rachel Steyer	1.1	\$750	\$825	Saad chart (reviewing depo transcript, exhibits, declarations, motions)	Experts (Including Retention)
6/27/2022	Travis Close	0.4	\$850	\$340	Review and analyze latest draft of list of undisputed facts	Case Organization, Planning and Strategy
6/27/2022	Travis Close	0.3	\$850	\$255	Review and analyze Def's reply iso motion to strike improper attorney declarations	Case Organization, Planning and Strategy
6/27/2022	Travis Close	0.3	\$850	\$255	Review and analyze additions to draft undisputed facts by BMU	Case Organization, Planning and Strategy
6/27/2022	Travis Close	1.4	\$850	\$1,190	Legal research re: whether cases cited in Def's Reply to strike attorney declarations stand for the arguments proposed	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/27/2022	Travis Close	1.2	\$850	\$1,020	Review and analyze depo transcript of Kelly Rubin for uncontested statements of fact re: service alignment system	Pleadings and Motions Re: Pleadings
6/27/2022	Travis Close	1.1	\$850	\$935	Review and analyze depo transcripts of Kevin Bowman for uncontested statements of fact re: service alignment system	Pleadings and Motions Re: Pleadings
6/27/2022	Travis Close	0.8	\$850	\$680	Review and analyze depo transcripts of Kevin Bowman for uncontested statements of fact re: budgets	Pleadings and Motions Re: Pleadings
6/28/2022	Guy Wallace	5.8	\$1,350	\$7,830	preparation and drafting of argument notes re hearing on MCC and related motions	Class Certification
6/28/2022	Guy Wallace	0.8	\$1,350	\$1,080	com's with DTM; JY; BU; MTJ; JAU; RLS re preparation for hearing on MCC and related motions	Class Certification
6/28/2022	Jennifer Bybee	1.4	\$925	\$1,295	Review D. Belson Reply Decl and include relevant portions of same in chart re Mtn. to Exclude	Class Certification
6/28/2022	Jennifer Bybee	1.9	\$925	\$1,758	Revise, reformat and edit P. Kenney chart re Mtn. to exclude; email same to GBW	Class Certification
6/28/2022	Jennifer Bybee	0.3	\$925	\$278	Look up which 3 BKD facilities were constructed before 1970; com's with GBW and RLS re same	Class Certification
6/28/2022	Jennifer Bybee	1.7	\$925	\$1,573	Revise and edit Belson chart re Mtn. to Exclude; email same to GBW	Class Certification
6/28/2022	Jennifer Bybee	0.6	\$925	\$555	Revise and edit Mastin chart re Mtn. to Exclude	Class Certification
6/28/2022	Jennifer Bybee	0.1	\$925	\$93	Combine Mastin & Waters Charts	Class Certification
6/28/2022	Jennifer Bybee	2.0	\$925	\$1,850	Review Mastin Reply Decl. iso MCC and include relevant sections in chart re Mtn. to Exclude.	Class Certification
6/28/2022	Jennifer Bybee	0.3	\$925	\$278	Review Waters Reply Decl iso MCC and include relevant portions in chart re Mtn. to Exclude	Class Certification
6/28/2022	Mark Johnson	0.6	\$1,150	\$690	calls x2 w/ GBW re argument on mtn for class certification and Daubert motions	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/28/2022	Mark Johnson	0.3	\$1,150	\$345	review COC list of potential questions for argument and analysis of Judge Gilliam's class cert decisions.	Class Certification
6/28/2022	Mark Johnson	8.5	\$1,150	\$9,775	work on analysis of expert opinions and Daubert motions for class cert hearing	Class Certification
6/28/2022	Mark Johnson	0.2	\$1,150	\$230	review memo from JY re meet and confer w/ OC on doc request responses and expert materials; email exchange re same	Discovery (Non-Deposition)
6/28/2022	Rachel Steyer	0.4	\$750	\$300	reviewing list of questions circulated by RBGG	Class Certification
6/28/2022	Rachel Steyer	0.5	\$750	\$375	finding answer to question for GBW concerning facilities constructed before 1970	Class Certification
6/28/2022	Travis Close	0.5	\$850	\$425	Review and analyze memo from co-counsel with outline for next week's hearing	Case Organization, Planning and Strategy
6/28/2022	Travis Close	1.3	\$850	\$1,105	Legal research re: recent cases interpreting Transunion and implications for standing in fraud class actions	Case Organization, Planning and Strategy
6/28/2022	Travis Close	0.9	\$850	\$765	Legal research re: ADA class actions in which common proof was found across buildings with different designs	Case Organization, Planning and Strategy
6/28/2022	Travis Close	0.8	\$850	\$680	Legal research on Judge Gilliam's recent class certification orders in Racies v. Quincy, Parker v. Cherne, In Re Lyft Securities Litig., Guzman v. Chipotle, and True Health Chiropractic Inc.	Case Organization, Planning and Strategy
6/28/2022	Travis Close	0.4	\$850	\$340	Analyze number of Brookdale residents claimed to be using brookdale's transportation services by Defendants vs. Flores' analysis of residents with mobility disabilities	Case Organization, Planning and Strategy
6/28/2022	Travis Close	1.4	\$850	\$1,190	Hearing prep: analyze Flores' findings with respect to number of residents who require personal services; number of residents with mobility/vision disabilities and implications for standing	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/28/2022	Travis Close	1.2	\$850	\$1,020	Hearing prep: review Dec and Reply Dec from Kennedy & depo testimony to ensure consistency with damages theory	Pleadings and Motions Re: Pleadings
6/29/2022	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of Plaintiffs' opening and reply brief re class certification; preparation for hearing on MCC	Class Certification
6/29/2022	Guy Wallace	5.7	\$1,350	\$7,695	preparation of arguments notes re proposed classes Nos. 1, 3	Class Certification
6/29/2022	Guy Wallace	3.3	\$1,350	\$4,455	review and analysis of potential questions for hearing on MCC; com's with MTJ re same	Class Certification
6/29/2022	Jennifer Bybee	0.6	\$925	\$555	Review G. Waters Reply Decl iso MCC and include relevant portions in chart re Mtn. to Exclude	Class Certification
6/29/2022	Jennifer Bybee	2.2	\$925	\$2,035	Finalize Mastin - Waters - Anderson chart re Mtn. to Exclude; email RLS re same; email GBW same	Class Certification
6/29/2022	Mark Johnson	0.8	\$1,150	\$920	call w/ GBW re oral argument issues, potential questions, access issues.	Class Certification
6/29/2022	Mark Johnson	0.6	\$1,150	\$690	review and analyze ED declarations re staffing issues	Class Certification
6/29/2022	Mark Johnson	0.3	\$1,150	\$345	draft summary of ED declaration highlights and deficiencies for oral argument notes	Class Certification
6/29/2022	Mark Johnson	8.8	\$1,150	\$10,120	continue, review, analysis and work-up of expert declarations and Daubert motions for oral argument	Class Certification
6/29/2022	Mark Johnson	0.4	\$1,150	\$460	call w/ JY re results of meet and confer and expectations of OC re document and expert data production	Discovery (Non-Deposition)
6/29/2022	Rachel Steyer	1.0	\$750	\$750	finding citations for GBW concerning budgetin gprocess and corporate approval	Class Certification
6/29/2022	Rachel Steyer	0.2	\$750	\$150	response to KS concerning call from family member of former resident	Class Outreach and Contact
6/29/2022	Rachel Steyer	0.3	\$750	\$225	follow up call with family member of former resident	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/29/2022	Rachel Steyer	1.7	\$750	\$1,275	revising Anderson notes for Mastin/Waters/Anderson chart	Experts (Including Retention)
6/30/2022	Guy Wallace	4.1	\$1,350	\$5,535	preparation for moot court re MCC and related motions	Class Certification
6/30/2022	Guy Wallace	1.8	\$1,350	\$2,430	com's with GCG; JY; BBK; AX; BU; MTJ; TCC; JAU; RLS re oral argument re MCC and related motions	Class Certification
6/30/2022	Guy Wallace	1.4	\$1,350	\$1,890	analysis of issues and potential problems raised at moot court re class certification hearing	Class Certification
6/30/2022	Jennifer Bybee	0.9	\$925	\$833	Incorporate RLS edits into chart re Mastin Waters Anderson; email same to GBW	Class Certification
6/30/2022	Jennifer Bybee	1.8	\$925	\$1,665	Zoom meeting re GBW moot of MCC	Class Certification
6/30/2022	Mark Johnson	0.7	\$1,150	\$805	call w/ GBW re ED declarations and deficiencies with same re staffing issues	Class Certification
6/30/2022	Mark Johnson	2.0	\$1,150	\$2,300	participate in oral argument rehearsal and follow up discussion	Class Certification
6/30/2022	Mark Johnson	1.8	\$1,150	\$2,070	further review of Flores testimony and declarations and D arguments and begin drafting email for COC re position on task times, frequencies and interpretation of Acuity Norms Spreadsheet	Class Certification
6/30/2022	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW re issues for oral argument on class cert motion, including operator status as common issue, ED discretion re staffing	Class Certification
6/30/2022	Mark Johnson	1.6	\$1,150	\$1,840	review ED depo testimony cited by Ds re exercise of discretion and draft email memo to GBW summarizing same	Class Certification
6/30/2022	Mark Johnson	2.7	\$1,150	\$3,105	review briefing on class cert motion and take notes, prepare questions for mock argument	Class Certification
6/30/2022	Mark Johnson	0.2	\$1,150	\$230	call w/ TCC re Kailles notes and communications and response to Ds request for same	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/30/2022	Mark Johnson	0.4	\$1,150	\$460	draft email to TCC re analysis of D requests for Kailes notes; review same	Discovery (Non-Deposition)
6/30/2022	Mark Johnson	0.2	\$1,150	\$230	email exchanges w/ COC Marks and Thornton re document requests for Schoyer/Flores docs and data related to reply declarations	Discovery (Non-Deposition)
6/30/2022	Rachel Steyer	1.9	\$750	\$1,425	attended/participated in moot for class cert hearing	Case Organization, Planning and Strategy
6/30/2022	Rachel Steyer	0.5	\$750	\$375	call with POA of current resident, discussed her concerns, primarily billing related	Class Outreach and Contact
6/30/2022	Rachel Steyer	0.6	\$750	\$450	returned call with family member of current residnet, discussed case and her issues	Class Outreach and Contact
6/30/2022	Travis Close	0.5	\$850	\$425	Call with MTJ discussing notes from Kailes and Cross before next week's M/C with defendants	Case Organization, Planning and Strategy
6/30/2022	Travis Close	1.2	\$850	\$1,020	Review and analyze correspondance w/ June Kailes and Doug Cross to find any notes shared	Case Organization, Planning and Strategy
6/30/2022	Travis Close	1.1	\$850	\$935	Analyze depo transcripts of Kailes and Cross for references to notes and requests for documents from opposing counsel	Case Organization, Planning and Strategy
6/30/2022	Travis Close	0.4	\$850	\$340	Review and analyze allegations of Junes (expert) re: deviation from benchmark	Case Organization, Planning and Strategy
6/30/2022	Travis Close	0.7	\$850	\$595	Prep for today's team moot/oral argument (draft questions for GBW)	Case Organization, Planning and Strategy
6/30/2022	Travis Close	2.0	\$850	\$1,700	Team meeting / moot for next week's class certification hearing	Class Certification
7/1/2022	Guy Wallace	1.2	\$1,350	\$1,620	com's with CJH re preparation for hearing on MCC and related motions	Class Certification
7/1/2022	Guy Wallace	0.9	\$1,350	\$1,215	analysis of results of com's with CJH re hearing preparation and further moot of argument for hearing on motion for class certification	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/1/2022	Guy Wallace	3.8	\$1,350	\$5,130	preparation and drafting of notes and responses to potential questions re motions for class certification and related motions	Class Certification
7/1/2022	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re preparation for hearing on motion for class certification	Class Certification
7/1/2022	Jennifer Bybee	0.9	\$925	\$833	Email to GBW re suggestions after moot	Class Certification
7/1/2022	Travis Close	1.3	\$850	\$1,105	Review and analyze community/resident council minutes produced by Defendants for info re: communications on service alignment or staffing systems	Case Organization, Planning and Strategy
7/1/2022	Travis Close	1.2	\$850	\$1,020	Hearing prep -- analyze emails showing date of rollout of Service Alignment software at the CA facilities	Class Certification
7/2/2022	Guy Wallace	1.8	\$1,350	\$2,430	preparation for hearing on motion for class certification and related motions; preparation of argument notes re same	Class Certification
7/2/2022	Guy Wallace	2.6	\$1,350	\$3,510	preparation of responses to potential questions from the Court re class certification motion	Class Certification
7/3/2022	Guy Wallace	1.2	\$1,350	\$1,620	legal research and analysis re Defendants' arguments about attenuated liability based on varying licensing arrangements re facilities	Class Certification
7/3/2022	Guy Wallace	1.5	\$1,350	\$2,025	prepare for and participate in zoom with DTM; JT; BU; MTJ re preparation for hearing re class certification and staffing issues	Class Certification
7/3/2022	Guy Wallace	1.6	\$1,350	\$2,160	com's with MTJ re Defendants' "management agreements" and argument that Defendants are not a covered public accommodation subject to liability under the ADA; review and analysis of Camarillo agreement	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/3/2022	Mark Johnson	1.2	\$1,150	\$1,380	call w/ GBW, JT, DM, BU re oral argument on class certification motion re staffing related issues, DES, Flores testimony, etc.	Class Certification
7/3/2022	Mark Johnson	0.9	\$1,150	\$1,035	call w GBW re analysis of Ex. 312 and arguments on class cert motion concerning operation of facilities, parties to agreements.	Class Certification
7/3/2022	Mark Johnson	0.2	\$1,150	\$230	follow-up call w/ GBW re staffing analysis, information from call w COC for argument on class cert mtn	Class Certification
7/3/2022	Mark Johnson	2.8	\$1,150	\$3,220	review management agreement, ex. 312 and draft email memos re same for file/GBW for oral argument	Class Certification
7/4/2022	Guy Wallace	1.2	\$1,350	\$1,620	review and analysis of com's from JAU; MTJ re Flores testimony; com's re preparation for hearing on class certification and related motions re experts	Class Certification
7/4/2022	Guy Wallace	1.1	\$1,350	\$1,485	preparation of responses to potential questions from court re damages classes	Class Certification
7/4/2022	Jennifer Bybee	2.3	\$925	\$2,128	Review Flores' deposition testimony and declaration for info re GBW questions; email GBW and MTJ re same	Class Certification
7/4/2022	Mark Johnson	0.6	\$1,150	\$690	call w/ GBW re class-wide statutory damages argument, Staffing issues for hearing on mtn for class cert	Class Certification
7/4/2022	Mark Johnson	0.4	\$1,150	\$460	call w GBW re meet and confer w/ OC re expert materials and issues to be raised at class cert hearing	Class Certification
7/4/2022	Mark Johnson	3.2	\$1,150	\$3,680	Review revised inspection reports and Anderson declaration and prepare charts identifying code sections applicable to each of 52 facilities for use at hearing.	Class Certification
7/4/2022	Mark Johnson	0.6	\$1,150	\$690	meet and confer w OC Bertino and Jacobsen re production of expert materials	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/5/2022	Guy Wallace	6.8	\$1,350	\$9,180	preparation of responses to potential questions and issues re hearing on MCC and related motions	Class Certification
7/5/2022	Guy Wallace	2.3	\$1,350	\$3,105	preparation of responses to potential questions from Court re understaffing; reasonable consumer expectations re staffing; Defendants' critique of Dr. Flores; Defendants' critique of Schroyer DES analyses; com's with MTJ; JAU re same	Class Certification
7/5/2022	Jennifer Bybee	2.8	\$925	\$2,590	Review Rocket Mortgage v. Alig and TransUnion and develop response for our case; com's with GBW re same	Class Certification
7/5/2022	Jennifer Bybee	0.3	\$925	\$278	Com's with GBW re Flores and task frequencies	Class Certification
7/5/2022	Jennifer Bybee	0.7	\$925	\$648	Review literature cited by Flores re prompting every 2 hours; email GBW re same	Class Certification
7/5/2022	Mark Johnson	0.7	\$1,150	\$805	call w/ K Stilber to work through issues re various versions of Ds opposition to class cert motion, discrepancies with Exhibit references, withdrawals and refilings of documents.	Class Certification
7/5/2022	Mark Johnson	0.6	\$1,150	\$690	review docket for various filings of D opposition to class cert motion and compare to unsealed versions produced.	Class Certification
7/5/2022	Mark Johnson	0.1	\$1,150	\$115	email exchange w/ OC re opp to class cert motion filed under seal on June 8.	Class Certification
7/5/2022	Mark Johnson	0.5	\$1,150	\$575	compare June 8 under seal version of opp to class cert motion to prior under seal version and unredacted ECF 363 version, com w/ GBW re same	Class Certification
7/5/2022	Mark Johnson	1.3	\$1,150	\$1,495	prepare chart for hearing on class cert motion identifying Ds alleged programming errors in DES model and our responses.	Class Certification
7/5/2022	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW re issues for hearing, including visuals, materials for argument, tasks to be completed.	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/5/2022	Mark Johnson	1.8	\$1,150	\$2,070	review exhibits related to start of SA and benchmarks, com w/ GBW by email re class period revision based on same; identify and share exhibits for potential reference at hearing.	Class Certification
7/5/2022	Mark Johnson	2.4	\$1,150	\$2,760	further review of D opposition and expert declarations for hearing prep	Class Certification
7/5/2022	Mark Johnson	0.3	\$1,150	\$345	draft email to COC summarizing meet and confer w/ OC re expert disclosure materials.	Discovery (Non-Deposition)
7/5/2022	Rachel Steyer	0.2	\$750	\$150	email to GBW with questions to consider for class cert hearing	Class Certification
7/5/2022	Travis Close	1.8	\$850	\$1,530	Hearing prep -- eview and analyze Scroyer dec, Def's motion to strike Scroyer testimony, and Schroyer reply to determine errors and corrections	Case Organization, Planning and Strategy
7/5/2022	Travis Close	1.5	\$850	\$1,275	Hearing prep -- analyze whether Schroyer, Flores and Jones addressed Def's issue with dropping final AL assessment after a resident moves from MC to AL	Case Organization, Planning and Strategy
7/5/2022	Travis Close	1.6	\$850	\$1,360	Hearing prep -- analyze whether Schroyer, Flores and Jones addressed Def's issue with not accounting whether residents moved back in after moving out, and potential impact on data of this alleged error	Case Organization, Planning and Strategy
7/5/2022	Travis Close	1.2	\$850	\$1,020	Analyze difference between construction history dates identified by Anderson v. those identified by Waters and Mastin	Case Organization, Planning and Strategy
7/5/2022	Travis Close	0.2	\$850	\$170	Email to MTJ re: analysis of management agreements	Case Organization, Planning and Strategy
7/5/2022	Travis Close	1.0	\$850	\$850	Create chart summarizing arguments in Kailes dec & Reply dec versus Def's arguments in motion to strike Kailes testimony	Pleadings and Motions Re: Pleadings
7/6/2022	Guy Wallace	0.9	\$1,350	\$1,215	preparation of argument notes for hearing on MCC and related motions	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/6/2022	Guy Wallace	9.6	\$1,350	\$12,960	preparation of argument notes and responses to potential questions re motion for class certification and related motions re experts	Class Certification
7/6/2022	Jennifer Bybee	1.5	\$925	\$1,388	Review Class Member Declarations and send summaries of impactful stores to GBW	Class Certification
7/6/2022	Mark Johnson	1.5	\$1,150	\$1,725	calls (.5) w/ GBW re issues and strategy for class cert argument	Class Certification
7/6/2022	Mark Johnson	0.3	\$1,150	\$345	coms w/ TCC and RLS re retrieval and organization of briefing on 11 ancillary motions for class cert hearing (including Dauberts, objections, RJN and mts attorney declarations	Class Certification
7/6/2022	Mark Johnson	0.4	\$1,150	\$460	review memos from COC re Plaintiff facts and hardships for class cert argument	Class Certification
7/6/2022	Mark Johnson	0.7	\$1,150	\$805	review COC Marks/Thornton memo re questions and answers on staffing issues and methodologies for class cert heaing.	Class Certification
7/6/2022	Mark Johnson	0.4	\$1,150	\$460	call w/ Tyler Smith re finalization of linked index of pleadings and exhibits for class cert hearing.	Class Certification
7/6/2022	Mark Johnson	2.8	\$1,150	\$3,220	work on summary of D arguments and P responses on Daubert motions and critiques of Ps experts.	Class Certification
7/6/2022	Mark Johnson	2.5	\$1,150	\$2,875	review and revise index of pleadings and exhibits and docs in underlying folder for class cert argument; including docs for Daubert and other ancillary motions	Class Certification
7/6/2022	Rachel Steyer	2.0	\$750	\$1,500	reviewing named plaintiffs declarations to identify anecdotes for GBW	Class Certification
7/6/2022	Rachel Steyer	0.5	\$750	\$375	response to GBW, MTJ, TCC, RBGG summarizing anecdotes from named plaintiff declarations for GBW	Class Certification
7/6/2022	Rachel Steyer	0.3	\$750	\$225	received call back from family member of now former Brookdale resident, discussed case	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/6/2022	Travis Close	0.8	\$850	\$680	Meet with MTJ re: tasks for prepping for tomorrow's hearing	Case Organization, Planning and Strategy
7/6/2022	Travis Close	0.9	\$850	\$765	Organize motions/pleadings for tomorrow's hearing -- Motion to Strike Expert Decs and Testimony -- Douglas Cross	Case Organization, Planning and Strategy
7/6/2022	Travis Close	0.8	\$850	\$680	Organize motions/pleadings for tomorrow's hearing -- Motion to Strike Expert Decs and Testimony -- June Kailes	Case Organization, Planning and Strategy
7/6/2022	Travis Close	1.3	\$850	\$1,105	Organize motions/pleadings for tomorrow's hearing -- Motion to Strike Expert Decs and Testimony -- Cristina Flores	Case Organization, Planning and Strategy
7/6/2022	Travis Close	1.2	\$850	\$1,020	Organize motions/pleadings for tomorrow's hearing -- Motion to Strike Expert Decs and Testimony -- Patrick Kennedy	Case Organization, Planning and Strategy
7/6/2022	Travis Close	0.8	\$850	\$680	Review and analyze recent updates in similar proposed class action Bright v. Brookdale senior living	Case Organization, Planning and Strategy
7/6/2022	Travis Close	1.1	\$850	\$935	Organize motions/pleadings for tomorrow's hearing -- Motion to Strike Expert Decs and Testimony -- Jeff Mastin and Gary Waters	Case Organization, Planning and Strategy
7/6/2022	Travis Close	0.2	\$850	\$170	Email to RLS re: organization assignments for Friday's hearing	Case Organization, Planning and Strategy
7/7/2022	Guy Wallace	2.1	\$1,350	\$2,835	revise and edit argument notes and responses to potential questions for hearing on class certification and related motions	Class Certification
7/7/2022	Guy Wallace	6.8	\$1,350	\$9,180	preparation for hearing on class certification and related motions; revise argument notes	Class Certification
7/7/2022	Guy Wallace	1.8	\$1,350	\$2,430	com's with GCG; DTM; JT; MTJ; JAU; TLC; RLS re preparation for hearing on class certification and related motions	Imported

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/7/2022	Mark Johnson	11.0	\$1,150	\$12,650	work with GBW and others re prep for class cert argument, including multiple calls w/ GBW re points to be made and responded to, review 38 page notes re argument; finalize doc list and linked docs in folder, work w/ TS and Langtech re same; research and analysis of agreements identified by BKD as example of non-involvement; finallize written analysis of Daubert arguments.	Class Certification
7/7/2022	Mark Johnson	0.4	\$1,150	\$460	coms w/ RLS, GBW and client Stacy Stiner re attendance at hearing.	Class Certification
7/7/2022	Rachel Steyer	4.6	\$750	\$3,450	reviewing ED depo transcripts and adding in relevant cites to GBW class cert hearing outline	Class Certification
7/7/2022	Rachel Steyer	0.2	\$750	\$150	call with MTJ to discuss logistics of getting Stacy Stiner to class cert hearing	Misc. Research
7/7/2022	Travis Close	0.7	\$850	\$595	Legal research re: Lara v. First Nat'l Ins. Co. of Am., 25 F.4th 1134 (9th Cir. 2022); and how Dist courts have subsequently interpreted/applied the law	Case Organization, Planning and Strategy
7/7/2022	Travis Close	1.6	\$850	\$1,360	Hearing prep -- legal research re: recent ninth circuit district court class actions opinions on whether injuries are common enough to predominate and warrant certification	Case Organization, Planning and Strategy
7/7/2022	Travis Close	0.6	\$850	\$510	Meet with GBW re: tasks before tomorrow's hearing	Case Organization, Planning and Strategy
7/7/2022	Travis Close	1.4	\$850	\$1,190	Analyze Def's briefing and authority for proposition that facilities vary with respect to whether they would be subject to coverage under Title III	Case Organization, Planning and Strategy
7/7/2022	Travis Close	0.8	\$850	\$680	Legal research re: whether plaintiffs must make specific showings about commerce to qualify brookdale facilities as public accommodations under Title III of ADA.	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/7/2022	Travis Close	0.5	\$850	\$425	Cite-checking outline by GBW for tomorrow's hearing	Class Certification
7/7/2022	Travis Close	0.8	\$850	\$680	Analyze Def's briefing on Lara v. First National case in their class cert filings	Pleadings and Motions Re: Pleadings
7/7/2022	Travis Close	1.1	\$850	\$935	Legal research re: compliance of damages models in class certification after Comcast v. Behrend	Pleadings and Motions Re: Pleadings
7/8/2022	Guy Wallace	3.6	\$1,350	\$4,860	preparation for hearing on class certification and related motions	Class Certification
7/8/2022	Guy Wallace	1.5	\$1,350	\$2,025	argue hearing on class certification and related motions	Class Certification
7/8/2022	Guy Wallace	1.7	\$1,350	\$2,295	analysis of results of hearing on class certification and com's with GCG; AX; KAS; BU; MTJ; JAU; TCC; RLS re results of same and next steps	Class Certification
7/8/2022	Mark Johnson	2.3	\$1,150	\$2,645	appear for argument on class cert motion (1.4 actual argument, .9 pre-hearing set up and coms w/ COC)	Class Certification
7/8/2022	Rachel Steyer	0.5	\$750	\$375	communications with TCC, MTJ, GBW and RBGG co-counsel following hearing	Class Certification
7/8/2022	Rachel Steyer	0.3	\$750	\$225	response to OJO for communications with potential class member	Class Outreach and Contact
7/8/2022	Rachel Steyer	0.5	\$750	\$375	follow up call with family member of former residnet to discuss status of hearing and arbitartion	Class Outreach and Contact
7/8/2022	Travis Close	0.6	\$850	\$510	Meet with RLS after hearing to discuss next week's assignments	Case Organization, Planning and Strategy
7/8/2022	Travis Close	0.8	\$850	\$680	Meet with MTJ, GBW, RLS to discuss supplemental disclosures	Case Organization, Planning and Strategy
7/8/2022	Travis Close	1.7	\$850	\$1,445	Legal research re: district courts applying Transunion to disability class actions	Case Organization, Planning and Strategy
7/8/2022	Travis Close	1.1	\$850	\$935	Legal research re: article iii standing under consumer class actions challenging policies and procedures	Case Organization, Planning and Strategy
7/9/2022	Guy Wallace	1.2	\$1,350	\$1,620	analysis of results of hearing on class certification and related motions	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/11/2022	Guy Wallace	2.8	\$1,350	\$3,780	analysis of draft supplemental disclosures; com's with MTJ and RLS re same and further discovery to be undertaken	Discovery (Non-Deposition)
7/11/2022	Mark Johnson	0.3	\$1,150	\$345	com w/ GBW re class cert hearing, assessment of discovery status and supplemental disclosures.	Case Organization, Planning and Strategy
7/11/2022	Mark Johnson	4.7	\$1,150	\$5,405	review discovery served to date and work on updating chart of same and responses	Discovery (Non-Deposition)
7/11/2022	Rachel Steyer	0.3	\$750	\$225	received follow up call from family member of resident, provided case update	Class Outreach and Contact
7/11/2022	Rachel Steyer	0.4	\$750	\$300	reviewing production for documents corresponding to family member of residnet	Discovery (Non-Deposition)
7/11/2022	Rachel Steyer	0.3	\$750	\$225	updating MTJ letter to OC for declarant resident files, preparing email to MTJ and GBW with first batch of authorization forms	Discovery (Non-Deposition)
7/11/2022	Rachel Steyer	0.2	\$750	\$150	response to GBW answering questions about updated supplemental initial disclosures	Discovery (Non-Deposition)
7/11/2022	Rachel Steyer	0.2	\$750	\$150	response to GBW concerning supplemental initial disclosures	Discovery (Non-Deposition)
7/11/2022	Rachel Steyer	4.1	\$750	\$3,075	updating and revising supplemental initial disclosures incorporating feedback from GBW	Discovery (Non-Deposition)
7/11/2022	Travis Close	0.2	\$850	\$170	Review and analyze court's order re: consolidation of sealing motions	Case Organization, Planning and Strategy
7/11/2022	Travis Close	0.8	\$850	\$680	Legal research re: local rules of northern district of california on proper sealing of documents	Case Organization, Planning and Strategy
7/11/2022	Travis Close	1.2	\$850	\$1,020	Analyze testimony fom Kevin Bowman re: Brookdale's maintainance of systems that track accessible spacs on vans	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/11/2022	Travis Close	0.8	\$850	\$680	Review and analyze Dec and Reply Dec of Flores for info re: number of residents with mobility disabilities compared to Brookdale's fleet of vehicles with accessible spaces	Case Organization, Planning and Strategy
7/11/2022	Travis Close	2.1	\$850	\$1,785	Review and analyze spreadsheets showing Brookdale's wheelchair capacities on its buses and vans	Discovery (Non-Deposition)
7/11/2022	Travis Close	1.7	\$850	\$1,445	Analyze prior filings in class cert motion, motions to strike, opposition, and reply briefs for motions to seal	Pleadings and Motions Re: Pleadings
7/12/2022	Guy Wallace	1.1	\$1,350	\$1,485	com's with MTJ; RLS re sealing and redaction of documents and legal standards re same	Other Motions
7/12/2022	Mark Johnson	2.0	\$1,150	\$2,300	continue review and documentation of discovery and responses, discovery motions	Discovery (Non-Deposition)
7/12/2022	Mark Johnson	1.0	\$1,150	\$1,150	call w/ GBW, JY, AX, BU re strategy for meet and confer w/ OC re consolidated motion to seal	Other Motions
7/12/2022	Mark Johnson	1.2	\$1,150	\$1,380	research re standard for motion to seal, caselaw examples; review RLS research re same	Other Motions
7/12/2022	Rachel Steyer	0.2	\$750	\$150	reviewing research from TCC re sealing motions	Misc. Research
7/12/2022	Rachel Steyer	0.9	\$750	\$675	drafting email to GBW, TCC, MTJ summarizing law for sealing motion	Misc. Research
7/12/2022	Rachel Steyer	1.0	\$750	\$750	gathering legal standards and rules for sealing motions, sending to GBW	Other Motions
7/12/2022	Rachel Steyer	2.4	\$750	\$1,800	conducted research into legal standards for sealing motion	Other Motions
7/12/2022	Rachel Steyer	1.1	\$750	\$825	additional research into sealing motion	Other Motions
7/12/2022	Travis Close	0.6	\$850	\$510	Meet with RLS re: finding cases on standards for motion to seal	Case Organization, Planning and Strategy
7/12/2022	Travis Close	0.4	\$850	\$340	Meet with MTJ re: research on standards for motions to seal	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/12/2022	Travis Close	1.7	\$850	\$1,445	Legal research re: Ninth circuit caselaw on reasons for keeping a document under seal	Case Organization, Planning and Strategy
7/12/2022	Travis Close	2.2	\$850	\$1,870	Draft memo to RLS, GBW re: standard for sealing information in the public record	Case Organization, Planning and Strategy
7/12/2022	Travis Close	1.4	\$850	\$1,190	Lergal research re: what qualifies as a compelling interest for sealing public records	Other Motions
7/12/2022	Travis Close	1.0	\$850	\$850	Leagl research re: class action opinions specifically denying motions to seal records (Ninth Circuit)	Pleadings and Motions Re: Pleadings
7/13/2022	Guy Wallace	1.4	\$1,350	\$1,890	legal research and analysis re ADA Title III DOJ regulations and final rule and deference to same; Supreme Court and Ninth Circuit precedents re same	Misc. Research
7/13/2022	Guy Wallace	2.9	\$1,350	\$3,915	com's with MTJ; TCC; RLS re sealing issues and concerns re Defendants' improper mass designations of documents as "confidential" under the Protective Order	Other Motions
7/13/2022	Guy Wallace	0.7	\$1,350	\$945	com's with GCG re compliance with District Court's Order re pending sealing motions; potential motions for summary adjudication of issues	Other Motions
7/13/2022	Mark Johnson	2.4	\$1,150	\$2,760	continue review of discovery orders and documenting / summarizing same to update discovery plan	Discovery (Non-Deposition)
7/13/2022	Mark Johnson	0.5	\$1,150	\$575	call w/ OC Jacobsen and Bertino and COC Yellin & Xu to meet and confer re joint consolidated motion re sealing documents	Other Motions
7/13/2022	Mark Johnson	0.7	\$1,150	\$805	call w/ GBW, TCC and GBW re joint sealing motion, identification of categories of docs warranting opposition, review of docs and prior sealing motions.	Other Motions
7/13/2022	Mark Johnson	0.2	\$1,150	\$230	coms w/ COC Yellin, Xu by email in prep for meet and confer w/ OC on joint sealing motion	Other Motions
7/13/2022	Mark Johnson	0.1	\$1,150	\$115	call w/ J Proctor re identification of docs improperly identified as confidential.	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/13/2022	Mark Johnson	0.2	\$1,150	\$230	coms w/ LEC re tasks related to prep for joint sealing motion involving identification and pulling related docs	Other Motions
7/13/2022	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW re joint sealing mtn, results of meet and confer w/ OC re same	Other Motions
7/13/2022	Mark Johnson	0.1	\$1,150	\$115	follow up call w/ GBW re identification of docs Ds seek to have sealed	Other Motions
7/13/2022	Mark Johnson	0.6	\$1,150	\$690	calls x2 w/ GBW re joint sealing motion, examples of improper sealing requests, allocation for work for opposition position, impact of prior failure to oppose motions	Other Motions
7/13/2022	Mark Johnson	0.5	\$1,150	\$575	follow up call w/ GBW re prior motions to seal, P position on same, joint consolidated motion to seal	Other Motions
7/13/2022	Mark Johnson	0.3	\$1,150	\$345	further call w GBW re joint consolidated sealing mtn and positions on categories of documents.	Other Motions
7/13/2022	Mark Johnson	0.7	\$1,150	\$805	call w/ GBW re joint consolidated sealing mtn, impact of prior court order and categories of docs approved for sealing; allocation of work btwn firms	Other Motions
7/13/2022	Mark Johnson	0.2	\$1,150	\$230	draft email to Marks/Thornton re portions of Schroyer/Flores depo transcripts to be sealed, if any.	Other Motions
7/13/2022	Mark Johnson	1.6	\$1,150	\$1,840	review prior motions to seal, proposed sealed / redacted documents and prior order granting and denying mtn to seal - for position on joint consolidated motion to seal	Other Motions
7/13/2022	Rachel Steyer	0.4	\$750	\$300	received call from declarant, discussed status update about case	Class Outreach and Contact
7/13/2022	Rachel Steyer	0.3	\$750	\$225	call with GBW to discuss further research for sealing motion	Other Motions
7/13/2022	Rachel Steyer	0.7	\$750	\$525	call with GBW, MTJ, TCC to discuss preparing chart tracking items sought to be sealed	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/13/2022	Rachel Steyer	3.0	\$750	\$2,250	research into confidential definition/standard for sealing motions	Other Motions
7/13/2022	Rachel Steyer	2.1	\$750	\$1,575	working on sealing motion chart, reviewing sealing motion exhibits designated for contention	Other Motions
7/13/2022	Travis Close	0.4	\$850	\$340	Review and analyze memo by co-counsel re: docket entries relevant to motion to seal;	Case Organization, Planning and Strategy
7/13/2022	Travis Close	0.6	\$850	\$510	Call with GBW re: motion to seal assignment and coordination	Case Organization, Planning and Strategy
7/13/2022	Travis Close	0.8	\$850	\$680	Review and analyze local rules from northern district of CA regarding how to oppose requests to seal docuemnts from public record	Case Organization, Planning and Strategy
7/13/2022	Travis Close	1.8	\$850	\$1,530	Legal research re: whether protective orders preventing disclosure of material marked as confidential by other side is absolute/enforceable	Other Motions
7/13/2022	Travis Close	1.9	\$850	\$1,615	Legal research re: proper procedure for filing motions under seal and when oppositons can be properly made	Other Motions
7/13/2022	Travis Close	0.7	\$850	\$595	Meet with RLS, MTJ and GBW re: assignments in prep for filing joint motion to seal	Other Motions
7/13/2022	Travis Close	0.9	\$850	\$765	Begin drafting chart (shared with RLS) of Ps/Ds' positions articulated for sealing specific documents from public record	Pleadings and Motions Re: Pleadings
7/14/2022	Guy Wallace	1.3	\$1,350	\$1,755	review and analysis of AX memo re sealing; com's with MTJ and TCC re sealing and documents or testimony that would qualify for same	Other Motions
7/14/2022	Rachel Steyer	0.2	\$750	\$150	response to GBW, MTJ, TCC, RBGG co-counsel and Marks co-counsel concerning depo transcript designation	Other Motions
7/14/2022	Rachel Steyer	0.7	\$750	\$525	meeting with MTJ and TCC to discuss preparing sealing chart	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/14/2022	Rachel Steyer	0.3	\$750	\$225	email to MTJ and TCC correcting info about extent of category of redactions granted by HSG	Other Motions
7/14/2022	Rachel Steyer	1.2	\$750	\$900	updating sealing motion chart	Other Motions
7/14/2022	Rachel Steyer	2.0	\$750	\$1,500	reviewing prior rulings/research of Judge on sealing motions	Other Motions
7/14/2022	Travis Close	0.4	\$850	\$340	Call with GBW re: this week's assignments related to sealing motion	Other Motions
7/14/2022	Travis Close	2.7	\$850	\$2,295	Continue drafting chart analyzing specific items proposed for sealing by Defs' for consolidated motion	Other Motions
7/14/2022	Travis Close	1.7	\$850	\$1,445	Legal research re: whether employee information is sealable / meets compelling interest standard	Other Motions
7/14/2022	Travis Close	1.5	\$850	\$1,275	Legal research re: whether company policies and procedures are sealable under "compelling interest" standard	Other Motions
7/14/2022	Travis Close	0.8	\$850	\$680	Meet with RLS, MTJ re strategy for charting Def's items proposed to be sealed	Other Motions
7/15/2022	Guy Wallace	0.9	\$1,350	\$1,215	legal research and analysis re proper scope of sealing of emails of corporate employees	Other Motions
7/15/2022	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ; RLS re preparation of joint motion re sealing issues	Other Motions
7/15/2022	Mark Johnson	0.4	\$1,150	\$460	calls and emails w/ D Marks and J Thornton re confidential designation of Schroyer / Flores depos and issues pertaining to sealing motion.	Other Motions
7/15/2022	Mark Johnson	2.0	\$1,150	\$2,300	call w/ GBW re status of analysis of docs Ds seek to have filed under seal	Other Motions
7/15/2022	Mark Johnson	0.2	\$1,150	\$230	review email and attached templates from OC for mtn to file under seal; draft responsive email re same and re limits on seeking to seal Saad and other large docs in their entirety	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/15/2022	Mark Johnson	1.5	\$1,150	\$1,725	review and draft analysis of proposed redactions from depositions for joint consolidated motion to seal documents.	Other Motions
7/15/2022	Rachel Steyer	0.2	\$750	\$150	call with MTJ to discuss which portions of sealing motions and sponsoring declarations to review/prepare	Other Motions
7/15/2022	Rachel Steyer	5.9	\$750	\$4,425	working on sealing chart, reviewing sealing motions and sponsoring declarations, reviewing corresponding documents to be sealed	Other Motions
7/15/2022	Travis Close	0.4	\$850	\$340	Meet with MTJ re: new chart for sealing motion	Case Organization, Planning and Strategy
7/15/2022	Travis Close	0.3	\$850	\$255	Meet with MTJ re: assignments for this weekend	Case Organization, Planning and Strategy
7/15/2022	Travis Close	1.2	\$850	\$1,020	Legal research re: regulations prescribing the resident assessment process	Other Motions
7/15/2022	Travis Close	0.4	\$850	\$340	Email to team re: regs prescribing the resident assessment process	Other Motions
7/15/2022	Travis Close	1.4	\$850	\$1,190	Sealing motion prep -- review and analyze DSS materials provided for Service Alignment materials	Other Motions
7/15/2022	Travis Close	2.7	\$850	\$2,295	Continue drafting table showing list of documents for sealing motion and Def's position / Plf's response	Pleadings and Motions Re: Pleadings
7/16/2022	Mark Johnson	0.5	\$1,150	\$575	call w/ GBW re issues pertaining to sealing motion	Other Motions
7/17/2022	Guy Wallace	0.9	\$1,350	\$1,215	legal research and analysis re sealing of documents, including Judge Staton's Order re same in Sunrise	Other Motions
7/17/2022	Mark Johnson	6.5	\$1,150	\$7,475	work on legal resarch memo re sealing confidential documents for joint sealling motion	Other Motions
7/18/2022	Guy Wallace	1.4	\$1,350	\$1,890	review and analysis of draft memos re legal standards on sealing; Defendants' proposed items for sealing; plaintiffs' positions re same	Other Motions
7/18/2022	Guy Wallace	0.8	\$1,350	\$1,080	com's with JY; MTJ; TCC; RLS re sealing motion	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/18/2022	Mark Johnson	0.5	\$1,150	\$575	call w/ BU, DM, JT re P position on redaction of Flores and Schroyer dep transcripts and declarations on joint motion to seal.	Other Motions
7/18/2022	Mark Johnson	2.5	\$1,150	\$2,875	continue research and add to memo re case law on sealing of confidential documents	Other Motions
7/18/2022	Mark Johnson	2.3	\$1,150	\$2,645	finalize memo on caselaw concerning sealing of confidential documents	Other Motions
7/18/2022	Mark Johnson	0.7	\$1,150	\$805	calls (x3) w /GBW re sealing motion strategy on same, inadequacy of defendant's showing.	Other Motions
7/18/2022	Mark Johnson	0.8	\$1,150	\$920	review D declarations iso sealing motions re depositions redactions and take notes on same	Other Motions
7/18/2022	Mark Johnson	0.2	\$1,150	\$230	emails w/ COC re joint mtn to seal / redact documents	Other Motions
7/18/2022	Rachel Steyer	0.6	\$750	\$450	received call from family member of current resident, discussed case status	Class Outreach and Contact
7/18/2022	Rachel Steyer	0.4	\$750	\$300	reviewing MTJ research memo on sealing cases	Misc. Research
7/18/2022	Rachel Steyer	0.3	\$750	\$225	response to GBW, TCC, MTJ regarding documents to seal	Other Motions
7/18/2022	Rachel Steyer	1.2	\$750	\$900	email to GBW, MTJ, TCC summarizing depo testimony of marked documents for sealing	Other Motions
7/18/2022	Rachel Steyer	0.2	\$750	\$150	double checking question MTJ raised about sponsoring attorney vs. employee declarations (TCC sent out email answering actual question)	Other Motions
7/18/2022	Rachel Steyer	3.2	\$750	\$2,400	ongoing research into motion to seal	Other Motions
7/18/2022	Travis Close	3.6	\$850	\$3,060	Continue drafting itemized chart of specific information proposed for redaction by defendants	Other Motions
7/18/2022	Travis Close	0.8	\$850	\$680	Email to GBW re: summary of categories of docs proposed to be sealed/redacted by defendants, as well as recommendations for which to oppose	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/18/2022	Travis Close	0.7	\$850	\$595	Review and analyze memo by MTJ re: sealing motion and case law	Other Motions
7/18/2022	Travis Close	2.2	\$850	\$1,870	Continue drafting itemized chart of specific information proposed for redaction by defendants: Recommendations for whether to oppose proposed items for redaction or sealing	Other Motions
7/19/2022	Guy Wallace	1.8	\$1,350	\$2,430	review and analysis of chart of Defendants' requests for sealing or redaction and Plaintiffs' potential responses thereto	Other Motions
7/19/2022	Guy Wallace	0.6	\$1,350	\$810	com's with RLS re responses to Defendants' proposed sealing of materials	Other Motions
7/19/2022	Guy Wallace	0.6	\$1,350	\$810	team zoom with JY; AX; KS; TCC; RLS re preparation of joint sealing motion	Other Motions
7/19/2022	Guy Wallace	0.4	\$1,350	\$540	analysis of Sunrise briefing re sealing of materials and com's with BU re same and pending joint motion to seal	Other Motions
7/19/2022	Rachel Steyer	0.4	\$750	\$300	reviewing portions of class cert motion sought to be sealed in Heredia and corresponding sealing order	Other Motions
7/19/2022	Rachel Steyer	0.5	\$750	\$375	call with GBW to discuss and review proposed sealing designations	Other Motions
7/19/2022	Rachel Steyer	0.6	\$750	\$450	zoom with GBW, TCC, RBGG co-counsel to discuss sealing motion	Other Motions
7/19/2022	Rachel Steyer	5.5	\$750	\$4,125	ongoing reserach into district court cases for sealing motion	Other Motions
7/19/2022	Travis Close	0.6	\$850	\$510	Review and analyze latest facility evaluation and complaint investigation reports by California Department of Social Services for the following facilities: Santa Monica, Auburn, Clairemont, Oceanside, Scotts Valley	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/19/2022	Travis Close	0.7	\$850	\$595	Meeting w/ GBW, RLS, and co-counsel re: sealing motion and assignments	Other Motions
7/19/2022	Travis Close	1.7	\$850	\$1,445	Legal research re: whether a company's systems and software are sealable material in 9th Circuit	Other Motions
7/19/2022	Travis Close	1.6	\$850	\$1,360	Analyze Flores, Schroyer, Saad and Jacobson transcripts for info re: specific testimony designated as confidential	Other Motions
7/19/2022	Travis Close	0.9	\$850	\$765	Legal research re: to what extent material previously disclosed in public record is sealable in Ninth Circuit	Other Motions
7/20/2022	Guy Wallace	0.4	\$1,350	\$540	review and analysis of and revise and edit draft of categories of responses to Defendants' requests to seal or redact; com's with JY; RLS re same	Other Motions
7/20/2022	Rachel Steyer	0.3	\$750	\$225	response to JSY from RBGG concerning draft statements to include in proposed order chart for motion to seal	Other Motions
7/20/2022	Rachel Steyer	3.0	\$750	\$2,250	ongoing review in district court cases concerning sealing motion	Other Motions
7/20/2022	Travis Close	0.8	\$850	\$680	Meet with RLS to discuss case authority findings for sealing motion	Case Organization, Planning and Strategy
7/20/2022	Travis Close	1.7	\$850	\$1,445	Legal research re: pending cases against Watermark Communities for elder abuse (PNC Joe DeCarlo)	Case Organization, Planning and Strategy
7/20/2022	Travis Close	0.5	\$850	\$425	Meet with LEC to discuss assignments for this week & sealing motion	Other Motions
7/21/2022	Guy Wallace	1.4	\$1,350	\$1,890	legal research and analysis re Transunion; Kirola; Chapman decisions and definition of injury in fact for purposes of Article III standing	Misc. Research
7/21/2022	Guy Wallace	1.1	\$1,350	\$1,485	legal research and analysis re ADAAG standard as minimum standard for accessibility in new construction; analysis of potential PSJ	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/21/2022	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of materials from Maatman re Defendants' motion to seal	Other Motions
7/21/2022	Guy Wallace	1.8	\$1,350	\$2,430	review and analysis of drafts of Plaintiffs' portions of sealing motion; Defendants' proposed redactions of Dr. Saad declaration; com's with JY; BU; MTJ; RLS re same	Other Motions
7/21/2022	Rachel Steyer	0.4	\$750	\$300	reviewing defendants' portion of proposed order for combined motion to seal and motion to seal itself	Other Motions
7/21/2022	Rachel Steyer	0.3	\$750	\$225	reviewing and comparing defendants updated chart of proposed items for redaction to internal chart	Other Motions
7/21/2022	Rachel Steyer	0.8	\$750	\$600	reviewing defendants' updated declaration to motion to seal	Other Motions
7/21/2022	Rachel Steyer	0.2	\$750	\$150	call with GBW to discuss preparing chart for Saad redactions	Other Motions
7/21/2022	Rachel Steyer	1.2	\$750	\$900	ongoing review of district court decisions for sealing motion	Other Motions
7/21/2022	Travis Close	1.0	\$850	\$850	Review and analyze Def's proposed chart of redactions for sealing motion	Other Motions
7/22/2022	Guy Wallace	4.2	\$1,350	\$5,670	review and analysis of Defendants' proposed redactions to declaration of Dr. Saad	Other Motions
7/22/2022	Guy Wallace	3.6	\$1,350	\$4,860	revise and edit draft brief re motion to seal; GBW declaration re motion to seal and accompanying chart; com's with JY; AX; RLS re same	Other Motions
7/22/2022	Guy Wallace	0.5	\$1,350	\$675	com's with DTM re class certification hearing and case schedule going forward; further expert analyses re staffing	Trial and Pretrial Preparation
7/22/2022	Rachel Steyer	1.1	\$750	\$825	reviewing class cert hearing transcript	Class Certification
7/22/2022	Rachel Steyer	2.3	\$750	\$1,725	preparing Saad depo proposed redactions chart for GBW	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/22/2022	Rachel Steyer	0.2	\$750	\$150	response to AX from RBGG providing example for sealing motion dealing with proposed redactions of names	Other Motions
7/22/2022	Rachel Steyer	0.5	\$750	\$375	reviewing draft of plaintiffs position/portion of joint motion to seal brief	Other Motions
7/22/2022	Rachel Steyer	0.2	\$750	\$150	updating GBW Saad designation chart	Other Motions
7/22/2022	Rachel Steyer	0.2	\$750	\$150	call with JSY from RBGG to review additions to revised Saad exhibit/chart to GBW declaration	Other Motions
7/22/2022	Travis Close	0.6	\$850	\$510	Review and analyze transcript of proceedings for class cert hearing on July 8, 2022	Class Certification
7/22/2022	Travis Close	0.9	\$850	\$765	Review and analyze proposed redactions for Saad declaration and Plf's responses agree/oppose, drafted by GBW	Other Motions
7/22/2022	Travis Close	1.4	\$850	\$1,190	Legal research re: whether executive employee names of corporations are sealable (Ninth Circuit)	Other Motions
7/22/2022	Travis Close	0.8	\$850	\$680	Review and analyze latest draft of combined motion to seal (updates by co-counsel)	Other Motions
7/22/2022	Travis Close	0.4	\$850	\$340	Email to GBW re: proposed redactions for Saad declaration and transcript	Other Motions
7/22/2022	Travis Close	0.7	\$850	\$595	Legal research re: updates to local rules and numbering re: sealing motions as affected by recent changes	Other Motions
7/22/2022	Travis Close	1.0	\$850	\$850	Legal research re: Ninth circuit decisions applying TransUnion's law regarding standing	Other Motions
7/24/2022	Jennifer Bybee	1.7	\$925	\$1,573	Review transcript of class certification hearing	Class Certification
7/25/2022	Guy Wallace	1.8	\$1,350	\$2,430	review and analysis of final drafts of GBW Declaration re joint motion to seal; brief re motion to seal; com's with JY; AX; RLS re same	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/25/2022	Rachel Steyer	0.9	\$750	\$675	received call back from family member of current resident, discussed case and family member's class member status	Class Outreach and Contact
7/25/2022	Rachel Steyer	0.2	\$750	\$150	reached out to family member of resident, discussed case	Class Outreach and Contact
7/25/2022	Rachel Steyer	5.1	\$750	\$3,825	legal reseacrth into treatment of Transunion decision and ADA	Misc. Research
7/25/2022	Rachel Steyer	0.3	\$750	\$225	reviewing defendants revisions to joint proposed order, motion to seal	Other Motions
7/25/2022	Rachel Steyer	0.2	\$750	\$150	reviewing updated revisions to plaintiffs' section of joint motion to seal	Other Motions
7/25/2022	Rachel Steyer	0.2	\$750	\$150	reviewing emails concerning proposed revisions to motion to seal	Other Motions
7/25/2022	Travis Close	1.1	\$850	\$935	Review and analyze draft dec of Jacobson iso combined motion to seal	Other Motions
7/25/2022	Travis Close	1.2	\$850	\$1,020	Review and analyze parties' notice of motion and joined comvined administration motion to seal	Other Motions
7/25/2022	Travis Close	1.5	\$850	\$1,275	Legal research re: whether previous non-opposition to items for sealing may be reversed in combined sealing motion	Other Motions
7/26/2022	Rachel Steyer	0.3	\$750	\$225	call with family member of current resident, provided update about status of case	Class Outreach and Contact
7/26/2022	Rachel Steyer	0.3	\$750	\$225	call with GBW to discuss TransUnion/Spokeo research	Misc. Research
7/26/2022	Travis Close	1.6	\$850	\$1,360	Review and analyze filed version of motion to seal & attachments for any inadvertent errors	Case Organization, Planning and Strategy
7/26/2022	Travis Close	2.4	\$850	\$2,040	Legal research re: cases where motions for summary judgment were granted on categories of access barriers at multiple facilities	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/26/2022	Travis Close	0.9	\$850	\$765	Legal research re: previous ADA case decisions by Judge Gilliam	Case Organization, Planning and Strategy
7/26/2022	Travis Close	1.5	\$850	\$1,275	Review and analyze updated complaint investigation and facility evaluation reports issued for San Marcos, Auburn, Ocean House, Chatsworth, and Riverwalk facilities	Discovery (Non-Deposition)
7/27/2022	Rachel Steyer	0.3	\$750	\$225	received call from family member of current resident, discussed case	Class Outreach and Contact
7/27/2022	Rachel Steyer	5.7	\$750	\$4,275	ongoing research into standing in light of TransUnion and Spokeo decisiosn	Misc. Research
7/27/2022	Travis Close	2.1	\$850	\$1,785	Legal research re: ninth circuit decisions granting summary judgment for physical access ADA cases	Case Organization, Planning and Strategy
7/28/2022	Rachel Steyer	6.7	\$750	\$5,025	ongoing research into standing/TransUnion/Spokeo	Misc. Research
7/29/2022	Jennifer Bybee	0.4	\$925	\$370	Com's with GBW re class cert hearing, TransUnion etc	Class Certification
8/1/2022	Guy Wallace	1.2	\$1,350	\$1,620	legal research and analysis re Transunion and concrete harm; com's with MTJ re same	Misc. Research
8/1/2022	Mark Johnson	0.1	\$1,150	\$115	text exchange w/ client re recent staffing issues, DSS inspection	Case Organization, Planning and Strategy
8/1/2022	Mark Johnson	0.1	\$1,150	\$115	email to COC re San Ramon inspection, MSJ meeting, sealing mtn	Case Organization, Planning and Strategy
8/1/2022	Mark Johnson	0.5	\$1,150	\$575	review DSS website docs re San Ramon; com w LEC re subscriptions to updates concerning each facility.	Case Organization, Planning and Strategy
8/1/2022	Mark Johnson	1.0	\$1,150	\$1,150	research and review information on DSS website re recent citations and visits to particular Brookdale facilities.	Case Organization, Planning and Strategy
8/1/2022	Rachel Steyer	7.3	\$750	\$5,475	drafting ADA standing memo	Misc. Research

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/1/2022	Travis Close	2.5	\$850	\$2,125	Review and analyze spreadsheet of brookdale facilities & investigate for additional new facilities and/or divestments in California	Case Organization, Planning and Strategy
8/2/2022	Guy Wallace	0.4	\$1,350	\$540	com's with GCG re class certification and plans re discovery going forward	Case Organization, Planning and Strategy
8/2/2022	Mark Johnson	1.2	\$1,150	\$1,380	review prior discovery orders and letter briefs and update chronology and summary of same	Case Organization, Planning and Strategy
8/2/2022	Rachel Steyer	6.5	\$750	\$4,875	ongoing reserach into standing and ADA claims, updating and revising memo	Misc. Research
8/3/2022	Mark Johnson	3.5	\$1,150	\$4,025	further review and analysis of letter briefs and orders and written discovery and responses and add to spreadsheet re same	Discovery (Non-Deposition)
8/3/2022	Mark Johnson	0.9	\$1,150	\$1,035	review new CA decision re Unruh act and ADA / Public accommodations and confer w/ GBW re same	Misc. Research
8/3/2022	Mark Johnson	0.5	\$1,150	\$575	call w/ GBW - brainstorm re strategy and issues for summary adjudication mtn	Motion for Summary Judgment / Adjudicaiton
8/3/2022	Rachel Steyer	0.4	\$750	\$300	received call back from family member of former resident, discussed case	Class Outreach and Contact
8/3/2022	Rachel Steyer	6.8	\$750	\$5,100	ongoing research and drafting memo on ADA standing	Misc. Research
8/4/2022	Guy Wallace	2.7	\$1,350	\$3,645	analysis of further discovery necessary for merits stage; class certification hearing and results thereof; com's with MTJ re same	Discovery (Non-Deposition)
8/4/2022	Mark Johnson	0.9	\$1,150	\$1,035	calls x2 w/ GBW re class cert outcome and scope of possible MSJ	Case Organization, Planning and Strategy
8/4/2022	Rachel Steyer	0.7	\$750	\$525	followed up with family member of former resident, discussed case	Class Outreach and Contact
8/4/2022	Rachel Steyer	0.2	\$750	\$150	reviewing electronic production for records corresponding to former resident to try to ascertain class member status	Discovery (Non-Deposition)
8/4/2022	Rachel Steyer	6.5	\$750	\$4,875	ongoign research and drafting memo on ADA standing	Misc. Research

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/5/2022	Guy Wallace	4.1	\$1,350	\$5,535	analysis of further areas of discovery and expert discovery necessary for trial preparation; com's with MTJ re same (.6)	Discovery (Non-Deposition)
8/5/2022	Rachel Steyer	0.4	\$750	\$300	returned call of class member, discussed case and provided update	Class Outreach and Contact
8/5/2022	Rachel Steyer	6.9	\$750	\$5,175	ongoing research and drafting into ADA and standing analysis	Misc. Research
8/6/2022	Guy Wallace	2.3	\$1,350	\$3,105	analysis of trial structure; potential motion for PSJ; remaining discovery and depositions; settlement; com's with MTJ re same (1.4)	Case Organization, Planning and Strategy
8/6/2022	Mark Johnson	1.4	\$1,150	\$1,610	call w/ GBW re MSJ strategy, trial, settlement prospects	Case Organization, Planning and Strategy
8/7/2022	Guy Wallace	2.4	\$1,350	\$3,240	review and analysis of discovery completed to date and remaining; potential for PSJ	Other Motions
8/8/2022	Guy Wallace	0.5	\$1,350	\$675	review and analysis of petition for certiorari filed in Olean; com's with GCG; JRA; BG re same	Class Certification
8/8/2022	Guy Wallace	1.6	\$1,350	\$2,160	legal research and analysis re intentionality requirement under the Unruh Act as it applies to showing violations of CBC standards; com's with MTJ re same	Other Motions
8/8/2022	Mark Johnson	2.7	\$1,150	\$3,105	continue reviewing history and substance of written discovery served and motions/orders and complete compilation of spreadsheet re same; share with co-counsel	Case Organization, Planning and Strategy
8/8/2022	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW re Unruh act claims, evidence of intentionality	Case Organization, Planning and Strategy
8/8/2022	Mark Johnson	1.5	\$1,150	\$1,725	review depo transcripts, rogs and document requests for evidence / testimony re Brookdale consideration of CBC, title 24	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/8/2022	Mark Johnson	0.5	\$1,150	\$575	review prior correspondence and record and draft correspondence to OC re confidentiality designation withdrawal and production of expert photos	Discovery (Non-Deposition)
8/8/2022	Rachel Steyer	0.6	\$750	\$450	received call back from family member of former resident, discussed case and provided case update	Class Outreach and Contact
8/8/2022	Rachel Steyer	0.3	\$750	\$225	reviewing documents corresponding to Brookdale resident	Discovery (Non-Deposition)
8/8/2022	Rachel Steyer	0.6	\$750	\$450	reviewing discovery summary chart prepared and circulated by MTJ	Discovery (Non-Deposition)
8/8/2022	Rachel Steyer	0.5	\$750	\$375	response to GBW and TCC concerning Olean cert petition filing	Misc. Research
8/8/2022	Rachel Steyer	1.7	\$750	\$1,275	reviewing Olean SCt cert petition	Misc. Research
8/8/2022	Rachel Steyer	2.8	\$750	\$2,100	ongoing ADA standing research and updating memo	Misc. Research
8/9/2022	Guy Wallace	1.4	\$1,350	\$1,890	analysis of petition for certiorari filed in Olean re predominance and uninjured class members; com's with JRA re same	Misc. Research
8/9/2022	Guy Wallace	1.1	\$1,350	\$1,485	com's with GG; JSY; AX; MTJ; TCC; RLS re potential motions for partial summary judgment	Motion for Summary Judgment / Adjudication
8/9/2022	Guy Wallace	1.3	\$1,350	\$1,755	preparation and analysis of potential issues for partial summary judgment; com's with Waters re same	Other Motions
8/9/2022	Guy Wallace	1.1	\$1,350	\$1,485	legal research and analysis re Unruh Act and intentionality requirement; analysis of potential summary adjudication claim	Other Motions
8/9/2022	Mark Johnson	1.1	\$1,150	\$1,265	team zoom call re MSJ planning and prep, discovery	Case Organization, Planning and Strategy
8/9/2022	Mark Johnson	0.2	\$1,150	\$230	coms w/ ESI staff re status of uploading document production, additional replacement doc production	Discovery (Non-Deposition)
8/9/2022	Mark Johnson	1.0	\$1,150	\$1,150	review Anderson depo testimony, exhibits and subpoena to identify unproduced documents for further demand	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/9/2022	Mark Johnson	0.2	\$1,150	\$230	revise and send email to OC re replacement docs for Anderson docs improperly designated as confidential, Mastin/Water photos	Discovery (Non-Deposition)
8/9/2022	Mark Johnson	0.2	\$1,150	\$230	review GBW list of possible MSJ issues and call with him re same and other issues	Motion for Summary Judgment / Adjudication
8/9/2022	Rachel Steyer	0.6	\$750	\$450	reviewing recent class decert decision circulated by GBW	Misc. Research
8/9/2022	Rachel Steyer	1.1	\$750	\$825	meeting with RBGG team to discuss possible PSJ	Motion for Summary Judgment / Adjudication
8/9/2022	Travis Close	2.1	\$850	\$1,785	Review and analyze Def's replacement production spanning BKD2970870-BKD2971605.	Case Organization, Planning and Strategy
8/9/2022	Travis Close	1.9	\$850	\$1,615	Legal research re: whether readily achievable barrier removal is an affirmative defense under ninth circuit	Case Organization, Planning and Strategy
8/9/2022	Travis Close	2.3	\$850	\$1,955	Draft memo to team re: legal standard for readily achievable barrier removal	Case Organization, Planning and Strategy
8/9/2022	Travis Close	1.0	\$850	\$850	Team meeting w/ RLS, MTJ, GBW and co-counsel re: strategy for PSJ	Case Organization, Planning and Strategy
8/10/2022	Mark Johnson	0.3	\$1,150	\$345	revise, add to and finalize email to OC re Anderson document production in response to subpoena and stip and order	Discovery (Non-Deposition)
8/10/2022	Rachel Steyer	6.8	\$750	\$5,100	ongoing ADA and standing research	Misc. Research
8/11/2022	Mark Johnson	0.1	\$1,150	\$115	email exchange w/ OC re their position on production of Anderson documents, meeting and conferring re same	Discovery (Non-Deposition)
8/11/2022	Rachel Steyer	0.5	\$750	\$375	received call back from family member of current resident, discussed case	Class Outreach and Contact
8/11/2022	Rachel Steyer	5.9	\$750	\$4,425	ongoing drafting of ADA standing research memo	Misc. Research
8/12/2022	Guy Wallace	2.4	\$1,350	\$3,240	analysis of issues re potential PSJ re new construction; readily achievable barrier removal; affirmative duties re same and access upon request	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/12/2022	Rachel Steyer	7.2	\$750	\$5,400	ongoing drafting research memo on ADA IIF/standing	Misc. Research
8/13/2022	Guy Wallace	1.7	\$1,350	\$2,295	legal research and analysis re affirmative duty to perform new construction and readily achievable barrier removal	Other Motions
8/13/2022	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ re readily achievable barrier removal, standards re same and potential discovery re same including Defendants' financial resources; further site inspections	Other Motions
8/15/2022	Rachel Steyer	0.2	\$750	\$150	response to class member declarant about case status	Class Certification
8/15/2022	Rachel Steyer	7.0	\$750	\$5,250	ongoing ADA and standing research	Misc. Research
8/16/2022	Mark Johnson	1.0	\$1,150	\$1,150	review updated notices and reports on complaint investigations on multiple facilities, including San Ramon and Scotts Valley	Discovery (Non-Deposition)
8/16/2022	Rachel Steyer	7.2	\$750	\$5,400	ongoing ADA standing research	Misc. Research
8/17/2022	Guy Wallace	0.8	\$1,350	\$1,080	com's with GCG; KAS; DTM re discovery and further expert analysis re staffing and access site inspections	Case Organization, Planning and Strategy
8/17/2022	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re PSJ motion; potential further settlement efforts; expert analyses	Case Organization, Planning and Strategy
8/17/2022	Guy Wallace	0.3	\$1,350	\$405	com's with Waters; Mastin re Defendants' contention that "access upon request" is compliant	Experts (Including Retention)
8/17/2022	Mark Johnson	3.8	\$1,150	\$4,370	work on draft ltr brief to compel production of Anderson docs	Other Motions
8/17/2022	Rachel Steyer	6.6	\$750	\$4,950	ongoing ADA standing research	Misc. Research
8/18/2022	Mark Johnson	0.7	\$1,150	\$805	calls (x3) with GBW re meet and confer w/ OC re production of Anderson docs, other discovery issues, cost issues and allocation among firms, commitment of resources.	Case Organization, Planning and Strategy
8/18/2022	Mark Johnson	2.7	\$1,150	\$3,105	complete draft of P section of joint discovery ltr re production of expert Anderson docs	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/18/2022	Mark Johnson	0.2	\$1,150	\$230	meet and confer W OC re production of anderson expert docs in response to subpoena	Other Motions
8/18/2022	Rachel Steyer	0.2	\$750	\$150	received follow up call from current resident, discussed case but call got dropped/disconnected	Class Outreach and Contact
8/18/2022	Rachel Steyer	0.4	\$750	\$300	received call back from residnet, discussed case and answered questions	Class Outreach and Contact
8/18/2022	Rachel Steyer	5.9	\$750	\$4,425	ongoing reserach and drafting/editing of reserach memo on ADA standing	Misc. Research
8/19/2022	Guy Wallace	0.5	\$1,350	\$675	revise and edit draft MTC re Defendants' failure to produce all materials from Anderson	Other Motions
8/19/2022	Rachel Steyer	7.0	\$750	\$5,250	ongoing research and drafting of ADA standing memo	Misc. Research
8/22/2022	Rachel Steyer	7.0	\$750	\$5,250	ongoing drafting of ADA standing research memo	Misc. Research
8/24/2022	Rachel Steyer	4.0	\$750	\$3,000	ongoing drafting of ADA research standing memo	Misc. Research
8/25/2022	Rachel Steyer	7.3	\$750	\$5,475	ongoing drafting of ADA stnaidng memo	Misc. Research
8/25/2022	Travis Close	0.7	\$850	\$595	Review and analyze new regulations issued by Cal DSS requiring residential care facilities to collaborate with home health & hospice agencies	Case Organization, Planning and Strategy
8/25/2022	Travis Close	1.1	\$850	\$935	Review and analyze updated facility evaluation reports and complaint investigation reports for San Ramon, Ocean House, Irvine, Clairemont, Oceanside, Lodi, Redwood City, and Scotts Valley facilities	Discovery (Non-Deposition)
8/25/2022	Travis Close	1.2	\$850	\$1,020	Review and analyze facility evaluation reports and complaint investigation reports issued for Alhambra, Nohl Ranch, Brookhurst, Auburn, Mirage Inn, Clairemont, Lodi, and Redwood City facilities	Discovery (Non-Deposition)
8/25/2022	Travis Close	1.6	\$850	\$1,360	Analyze new regulations issued in Provider Information Notices by Cal DSS for 2022 for info re: staffing requirements	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/25/2022	Travis Close	0.7	\$850	\$595	Review and analyze draft letter brief by MTJ on issue of deficient production of discovery by Def's expert Douglas Anderson and his survey team	Discovery (Non-Deposition)
8/25/2022	Travis Close	1.8	\$850	\$1,530	Analyze communications & Dropbox files received by Jeff Mastin and Gary Waters re: facility site inspections; compare to expert disclosures for any photos that may not have been shared with Defendants	Experts (Including Retention)
8/26/2022	Guy Wallace	0.6	\$1,350	\$810	review and analysis of draft MTC re Defendants' failure to produce materials from Anderson; com's with MTJ re same	Other Motions
8/26/2022	Rachel Steyer	0.2	\$750	\$150	email to GBW summarizing Brookdale projects worked on	Class Certification
8/26/2022	Rachel Steyer	0.6	\$750	\$450	email to GBW summarizing class outreach efforts	Class Outreach and Contact
8/26/2022	Travis Close	1.7	\$850	\$1,445	Legal research re: cite-checking Def's cases cited for proposition that discovery should be stayed pending class certification	Case Organization, Planning and Strategy
8/26/2022	Travis Close	0.4	\$850	\$340	Review and analyze revised version of joint letter brief re: missing Anderson discovery with Def's section incorporated	Case Organization, Planning and Strategy
8/26/2022	Travis Close	0.4	\$850	\$340	Email to GBW re: list of projects worked on in case	Case Organization, Planning and Strategy
8/26/2022	Travis Close	1.5	\$850	\$1,275	Legal research re: whether surveying experts can be protected from disclosure of discovery under Rule 26(b)(4)(D) or must testify at trial in ADA cases	Discovery (Non-Deposition)
8/29/2022	Mark Johnson	0.7	\$1,150	\$805	revise and finalize P section of MTC ltr re Anderson docs	Other Motions
8/29/2022	Mark Johnson	0.8	\$1,150	\$920	review D cases and research other cases on Rule 26(b)(4)(D) for mtc letter re Anderson docs	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/29/2022	Mark Johnson	0.1	\$1,150	\$115	email to OC re revisions to MTC letter re Anderson docs	Other Motions
8/29/2022	Rachel Steyer	0.2	\$750	\$150	call(s) with declarant to provide update about case status	Class Certification
8/29/2022	Rachel Steyer	6.8	\$750	\$5,100	opngoing drafting of ADA standing research memo	Misc. Research
8/29/2022	Travis Close	0.3	\$850	\$255	Review and analyze revised draft of joint letter brief re: Anderson discovery not yet produced (MTJ further edits)	Case Organization, Planning and Strategy
8/30/2022	Guy Wallace	1.6	\$1,350	\$2,160	analysis of further expert work needed for trial preparation; com's with DTM; MTJ re same	Case Organization, Planning and Strategy
8/30/2022	Mark Johnson	0.5	\$1,150	\$575	review D revisions to joint ltr brief re Anderson docs, coms w/ COC re same, com w/ LEC re finalizing ltr and exhibits.	Other Motions
8/30/2022	Rachel Steyer	6.1	\$750	\$4,575	ongoing drafting of ADA research standing memo	Misc. Research
8/31/2022	Mark Johnson	0.5	\$1,150	\$575	final review and comment on PDF for filing of joint ltr brief re Anderson docs, com w/ clerk re courtesy copies	Other Motions
8/31/2022	Rachel Steyer	0.3	\$750	\$225	locating type of facility for GBW relative to recent order	Misc. Research
8/31/2022	Travis Close	1.3	\$850	\$1,105	Legal research re: types of senior living facilities affected by ADA ruling in Southwest Fair Housing Council v. WG Scottsdale LLC	Case Organization, Planning and Strategy
8/31/2022	Travis Close	0.5	\$850	\$425	Email to GBW, RLS re: Atria case in AZ finding in favor of ADA violations after trial	Case Organization, Planning and Strategy
8/31/2022	Travis Close	1.5	\$850	\$1,275	Legal research re: whether defendants in AZ Atria case challenged their coverage under the ADA	Case Organization, Planning and Strategy
8/31/2022	Travis Close	1.2	\$850	\$1,020	Legal research re: whether Brookdale senior living challenged its coverage under ADA in case brought in AZ regarding sign language/interpreters for residents	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/31/2022	Travis Close	1.2	\$850	\$1,020	Legal research re: "benefit of the bargain" in the context of assisted living caes and resident v. company	Case Organization, Planning and Strategy
9/1/2022	Guy Wallace	2.8	\$1,350	\$3,780	preparation of analysis of further expert work to be undertaken through pretrial conference; com's with Waters; Kennedy; GCG; MTJ re same	Case Organization, Planning and Strategy
9/1/2022	Mark Johnson	0.4	\$1,150	\$460	review proposed case budget / planning through pre-trial conference, call w/ GBW re same	Case Organization, Planning and Strategy
9/1/2022	Rachel Steyer	6.8	\$750	\$5,100	ongoing drafting and research fo ADA stnding memo	Misc. Research
9/3/2022	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of Order from MJ Beeler re discovery pending ruling on class certification; com's with MTJ re same	Other Motions
9/6/2022	Travis Close	0.5	\$850	\$425	Review and analyze updated facility evaluation reports and complaint investigation reports issued for Irvine, Clairemont, Lodi, Tracy, and Chanate facilities	Case Organization, Planning and Strategy
9/7/2022	Travis Close	0.5	\$850	\$425	Review history of communications and participation with class member Ken London	Class Outreach and Contact
9/7/2022	Travis Close	0.2	\$850	\$170	Email to RLS re: communication needed with class member Ken London	Imported
9/8/2022	Travis Close	0.4	\$850	\$340	Review and analyze history of prior communications and activity with class member Penny Kahn	Case Organization, Planning and Strategy
9/8/2022	Travis Close	1.1	\$850	\$935	Call with class member Penny Kahn re: story of mother's stay at Brookdale San Marcos and update on case status	Class Outreach and Contact
9/12/2022	Guy Wallace	0.7	\$1,350	\$945	zoom with GCG; JY; BBK; AX; KS; BU; MTJ; TCC re stay of discovery; preparation of MSJ	Case Organization, Planning and Strategy
9/12/2022	Mark Johnson	0.6	\$1,150	\$690	team zoom call w/ GCG, JY, AX, Luke W, BBK, GBW, TCC, BU re action to be taken on recent discovery ruling, planning for summary judgment motion	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/12/2022	Mark Johnson	0.4	\$1,150	\$460	review draft amended co-counseling agreement and com w/ GBW re same	Case Organization, Planning and Strategy
9/12/2022	Travis Close	0.8	\$850	\$680	Meeting with GBW, MTJ and co-counsel re: judge beeler's discovery order and plans for MSJ	Case Organization, Planning and Strategy
9/12/2022	Travis Close	1.3	\$850	\$1,105	Legal research re: FRCP Rules for determining how to object to magistrate judge ruling	Case Organization, Planning and Strategy
9/12/2022	Travis Close	1.7	\$850	\$1,445	Research federal case law on FRCP Rule 72(a)-(b) for what consitututes objections to rulings	Case Organization, Planning and Strategy
9/12/2022	Travis Close	0.7	\$850	\$595	Legal research re: local rules of N.D.C.A. for determining how to object to magistrate judge ruling	Case Organization, Planning and Strategy
9/12/2022	Travis Close	0.9	\$850	\$765	Call with class member Diana Martinez re: update on status of case and story of mother's experience at Brookdale Carmel Valley	Class Outreach and Contact
9/13/2022	Travis Close	1.7	\$850	\$1,445	Legal research re: justification for decisions ordering bifurcation/staying of discovery before class cert decision is issued	Case Organization, Planning and Strategy
9/13/2022	Travis Close	1.9	\$850	\$1,615	Legal research re: cases pertaining to motion for relief under rule 72(a) dealing with a stay on discovery	Case Organization, Planning and Strategy
9/13/2022	Travis Close	1.3	\$850	\$1,105	Begin drafting outline for motion for relief under rule 72(a)	Case Organization, Planning and Strategy
9/13/2022	Travis Close	1.8	\$850	\$1,530	Continue drafting motion for relief under rule 72(a) (standard of review, facts)	Case Organization, Planning and Strategy
9/13/2022	Travis Close	0.5	\$850	\$425	Review and analyze parties' joint letter brief seeking/opposing additional discovery from Def's expert Anderson + Exhibits	Discovery (Non-Deposition)
9/14/2022	Mark Johnson	4.0	\$1,150	\$4,600	work on mtn to amend the judgment to exclude SW from sanctions order.	Other Motions
9/14/2022	Mark Johnson	1.4	\$1,150	\$1,610	review and edit / add to draft objections to discovery order re Anderson documents.	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/14/2022	Travis Close	1.9	\$850	\$1,615	Legal research re: proper procedure for moving to stay discovery	Case Organization, Planning and Strategy
9/14/2022	Travis Close	0.4	\$850	\$340	Review and analyze Reckley v. Goodman Group (ADA case in Montana at a Brookdale facility)	Case Organization, Planning and Strategy
9/14/2022	Travis Close	1.5	\$850	\$1,275	Legal research on cases where discovery was stayed while class cert motion pending	Case Organization, Planning and Strategy
9/14/2022	Travis Close	0.3	\$850	\$255	Email to MTJ, GBW re: draft motion for review of nondispositive order	Other Motions
9/14/2022	Travis Close	2.2	\$850	\$1,870	Continue drafting motion for review of nondispositive motion (Argument 1-2)	Other Motions
9/14/2022	Travis Close	1.1	\$850	\$935	Continue drafting motion for review of nondispositive motion (Argument 3)	Other Motions
9/15/2022	Mark Johnson	0.4	\$1,150	\$460	call w/ TCC re strategy, comments on objections to MJ Beeler's ruling on MTC Anderson docs	Other Motions
9/15/2022	Mark Johnson	2.0	\$1,150	\$2,300	review next draft of objections to MJ Beeler's order on Anderson docs, add to and revise same.	Other Motions
9/15/2022	Travis Close	0.4	\$850	\$340	Review and analyze edits by MTJ to motion for review of nondispositive order	Case Organization, Planning and Strategy
9/15/2022	Travis Close	0.3	\$850	\$255	Email to GBW re: responding to edits and concerns with motion for review of nondispositive order	Case Organization, Planning and Strategy
9/15/2022	Travis Close	0.9	\$850	\$765	Review and analyze prior docket entries for Def's request for stay on discovery before ruling of class cert	Case Organization, Planning and Strategy
9/15/2022	Travis Close	1.1	\$850	\$935	Further revisions to updated draft of motion for relief from nondispositive order (facts/scheduling notes)	Case Organization, Planning and Strategy
9/15/2022	Travis Close	1.6	\$850	\$1,360	Further revisions to updated draft of motion for relief from nondispositive order (Argument IV(1))	Case Organization, Planning and Strategy
9/15/2022	Travis Close	1.4	\$850	\$1,190	Legal research re: additional ninth circuit appellate/district court cases showing that a motion to stay discovery is a heavy burden for the movant	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/15/2022	Travis Close	0.2	\$850	\$170	Email to MTJ, GBW re: updated draft of motion for relief	Case Organization, Planning and Strategy
9/15/2022	Travis Close	0.5	\$850	\$425	Further revisions to updated draft of motion for relief from nondispositive order (Argument IV(2))	Case Organization, Planning and Strategy
9/15/2022	Travis Close	0.8	\$850	\$680	Call with MTJ re: strategy for motion for review of judge beeler's order	Experts (Including Retention)
9/16/2022	Guy Wallace	3.8	\$1,350	\$5,130	revise and edit drafts of objections to MJ Beeler Order of 9/2/22; com's with GCG; MTJ; TCC re same	Other Motions
9/16/2022	Mark Johnson	0.7	\$1,150	\$805	review revised draft of objections to MJ Beeler order on Anderson docs and confer /w GBW re same, email to TCC re follow up edits.	Other Motions
9/16/2022	Mark Johnson	2.5	\$1,150	\$2,875	make further cuts and revisions to draft objections to MJ Beeler ruling on Anderson docs	Other Motions
9/16/2022	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW and GCG re tone of objections to MJ beeler ruling on Anderson docs	Other Motions
9/16/2022	Travis Close	2.1	\$850	\$1,785	Further legal research re: cases where a stay of discovery is requested before a nondispositive motion	Case Organization, Planning and Strategy
9/16/2022	Travis Close	0.4	\$850	\$340	Emails to GBW, co-counsel re: circulating draft of motion for review to the team	Case Organization, Planning and Strategy
9/16/2022	Travis Close	0.4	\$850	\$340	Meet with LEC re: instructions for filing today's motion	Case Organization, Planning and Strategy
9/16/2022	Travis Close	0.4	\$850	\$340	Call with MTJ re: edits to further draft of motion for relief	Case Organization, Planning and Strategy
9/16/2022	Travis Close	0.4	\$850	\$340	Review and analyze & incorporate edits by co-counsel into latest draft of motion for relief	Case Organization, Planning and Strategy
9/16/2022	Travis Close	2.3	\$850	\$1,955	Proof-reading and edits to motion for relief from nondispositive order; cuts to reduce word count to within 5 page limit	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/16/2022	Travis Close	0.3	\$850	\$255	Review and analyze edits by MTJ to latest draft of motion for relief	Discovery (Non-Deposition)
9/16/2022	Travis Close	0.6	\$850	\$510	Legal research re: when is a affidavit/declaration required to substantiate facts stated in a motion	Discovery (Non-Deposition)
9/18/2022	Guy Wallace	4.8	\$1,350	\$6,480	legal research and analysis re potential PSJ re issue raised by Defendants' admitted policy and practice of dealing with barriers by way of "access upon request"	Other Motions
9/19/2022	Guy Wallace	0.5	\$1,350	\$675	prepare for and participate in zoom with JY; BBK; AX re potential motion for PSJ	Motion for Summary Judgment / Adjudication
9/19/2022	Guy Wallace	0.7	\$1,350	\$945	legal research and analysis re whether persons with disabilities can be required to pay for barrier removal	Other Motions
9/19/2022	Guy Wallace	0.2	\$1,350	\$270	review and analysis of MJ Beeler's supplemental order requiring Defendants to file a motion to stay with Judge Gilliam	Other Motions
9/19/2022	Rachel Steyer	0.2	\$750	\$150	call back to family member of former resident to provide case update/status	Class Outreach and Contact
9/19/2022	Rachel Steyer	4.7	\$750	\$3,525	ongoing ADA standing research project	Misc. Research
9/19/2022	Travis Close	0.7	\$850	\$595	Review and analyze filed version of motion for relief + exhibits for inadvertent errors	Case Organization, Planning and Strategy
9/19/2022	Travis Close	0.5	\$850	\$425	Email to RLS re: recent contacts with Brookdale residents and family members	Case Organization, Planning and Strategy
9/19/2022	Travis Close	0.7	\$850	\$595	Call with class member Ken London re: case update and concerns from family member at Brookdale facility	Case Organization, Planning and Strategy
9/19/2022	Travis Close	0.2	\$850	\$170	Review and analyze judge beeler's modifications of prior order on discovery	Case Organization, Planning and Strategy
9/20/2022	Mark Johnson	0.3	\$1,150	\$345	review supp order from MJ Beeler re motion to compel Anderson docs and supp letter brief; draft email to OC re same	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/20/2022	Rachel Steyer	0.2	\$750	\$150	reviewing plaintiffs' motion for relief from nondispositive pretrial order	Discovery (Non-Deposition)
9/20/2022	Rachel Steyer	7.0	\$750	\$5,250	oinging research into ADA standing project	Misc. Research
9/20/2022	Travis Close	0.7	\$850	\$595	Meet with RLS, LEC re: assignments for this week	Case Organization, Planning and Strategy
9/20/2022	Travis Close	2.4	\$850	\$2,040	Create chart documenting discovery disputes and outcomes with magistrate judge beeler	Case Organization, Planning and Strategy
9/20/2022	Travis Close	0.4	\$850	\$340	email to class member Ken London re: update on status of case	Case Organization, Planning and Strategy
9/20/2022	Travis Close	0.4	\$850	\$340	Meet with MTJ re: next steps for pending discovery disputes	Case Organization, Planning and Strategy
9/21/2022	Rachel Steyer	6.3	\$750	\$4,725	ongoing ADA standing research project	Misc. Research
9/21/2022	Travis Close	0.6	\$850	\$510	Review and analyze updated facility evaluation and complaint investigation reports issued by Cal DSS for Oceanside, Clairemont, Elk Grove, Diablo Lodge, and Tracy facilities	Case Organization, Planning and Strategy
9/22/2022	Mark Johnson	0.7	\$1,150	\$805	call w GBW re long range planning, possible settlement strategies and scenarios	Case Organization, Planning and Strategy
9/26/2022	Rachel Steyer	7.0	\$750	\$5,250	ongoing ADA standing research	Misc. Research
9/26/2022	Travis Close	0.6	\$850	\$510	Call with Hilde Gomez re: update on status of case and opportunities for participation	Class Outreach and Contact
9/28/2022	Rachel Steyer	0.3	\$750	\$225	email to GBW with question about ongoing research project	Misc. Research
9/28/2022	Rachel Steyer	4.6	\$750	\$3,450	ongoing ADA standing research	Misc. Research
9/29/2022	Guy Wallace	0.5	\$1,350	\$675	com's with RLS re legal research re TransUnion and impact on Article III standing	Misc. Research
10/2/2022	Mark Johnson	0.8	\$1,150	\$920	draft bullet point outline of response to motion to stay discovery and email to COC JY re same	Other Motions
10/3/2022	Travis Close	1.8	\$850	\$1,530	Draft outline for opposition to motion to stay	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/3/2022	Travis Close	0.4	\$850	\$340	Emsil to LEC re: assignments and deadlines for this week	Case Organization, Planning and Strategy
10/4/2022	Travis Close	0.3	\$850	\$255	Email to MTJ re: follow up on complaint by resident at Clairemont facility for failure to conduct fire evacuation drills	Case Organization, Planning and Strategy
10/4/2022	Travis Close	0.5	\$850	\$425	Research requirements under Cal Code of Regs for emergency evacuation drills and whether residents are required to attend	Case Organization, Planning and Strategy
10/5/2022	Travis Close	0.5	\$850	\$425	Review and analyze Def's motion to stay discovery + exhibits	Case Organization, Planning and Strategy
10/5/2022	Travis Close	1.1	\$850	\$935	Legal research re: whether motions for class certification are dispositive (responding to Def's argument in motion to stay discovery)	Case Organization, Planning and Strategy
10/5/2022	Travis Close	0.4	\$850	\$340	Email to JIK (emergency evacuation expert) re: update on status of case	Case Organization, Planning and Strategy
10/6/2022	Mark Johnson	0.1	\$1,150	\$115	review email from OC re briefing and privilege log re Anderson docs; com w/ GBW re same	Other Motions
10/6/2022	Travis Close	0.5	\$850	\$425	Call with Cathy Brooks re: status update of case and decision on motion for class certification	Case Organization, Planning and Strategy
10/10/2022	Rachel Steyer	0.8	\$750	\$600	received call from family member of current resident, discussed case, answered questiosn	Class Outreach and Contact
10/10/2022	Travis Close	0.5	\$850	\$425	Research recent class action decisions by Judge Gilliam	Case Organization, Planning and Strategy
10/11/2022	Travis Close	1.2	\$850	\$1,020	Review and analyze recent facility evaluation reports and complaint investigation reports issued to Oceanhouse, Irvine, Roseville, Ocean House, San Jose, Windsor, Paulin Creek, Chanate facilities	Case Organization, Planning and Strategy
10/11/2022	Travis Close	2.2	\$850	\$1,870	Update master facility chart with recent facilities acquired and/or divested from Brookdale; licensee and name changes; etc	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/11/2022	Travis Close	0.4	\$850	\$340	Email to Doug Cross (expert) re: update on status of case	Case Organization, Planning and Strategy
10/12/2022	Mark Johnson	0.9	\$1,150	\$1,035	review and draft edits and addtions to draft opposition to motion to stay all disocvery pending class cert decision.	Other Motions
10/12/2022	Rachel Steyer	2.0	\$750	\$1,500	resumption of ADA standing research	Misc. Research
10/12/2022	Travis Close	0.4	\$850	\$340	Email to JIK (expert) re: upcoming schedule for class certification and trial	Case Organization, Planning and Strategy
10/13/2022	Travis Close	0.8	\$850	\$680	Review and analyze draft (co-counsel) of Plf's opposition to Def's motion to stay discovery pending class certification	Case Organization, Planning and Strategy
10/13/2022	Travis Close	1.7	\$850	\$1,445	Analyze prior history of communications with opposing counsel re: stay of discovery pending class certification	Case Organization, Planning and Strategy
10/13/2022	Travis Close	1.7	\$850	\$1,445	Review and analyze history of facility access inspections for facilities that were scheduled but never inspected	Case Organization, Planning and Strategy
10/13/2022	Travis Close	0.2	\$850	\$170	Email to LEC re: class member/family member Laura Payne needs to be contacted	Case Organization, Planning and Strategy
10/14/2022	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of Plaintiffs' opposition to Defendants' motion to stay; Defendants' draft response re pending document dispute re Anderson; com's with MTJ re same	Discovery (Non-Deposition)
10/14/2022	Mark Johnson	3.5	\$1,150	\$4,025	work on renewed joint letter re discovery dispute re Anderson documents; review and analyze 3,900 entry privilege log for same	Other Motions
10/14/2022	Rachel Steyer	7.2	\$750	\$5,400	ongoing ADA standing research	Misc. Research
10/14/2022	Travis Close	0.2	\$850	\$170	Email to team re: strategy for submission of discovery letter brief	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/17/2022	Mark Johnson	0.3	\$1,150	\$345	mtg w/ TCC re legal research on discovery from non-testifyig expert for motion to compel	Other Motions
10/17/2022	Rachel Steyer	7.2	\$750	\$5,400	ongoing ADA standing research project	Misc. Research
10/17/2022	Travis Close	0.5	\$850	\$425	Review and analyze revised joint letter brief re: Anderson discovery	Case Organization, Planning and Strategy
10/17/2022	Travis Close	1.8	\$850	\$1,530	research Fed. R. Civ. P. 26 on non testifying experts	Case Organization, Planning and Strategy
10/17/2022	Travis Close	2.5	\$850	\$2,125	Legal research on Fed. R. Civ. P. 26(b)(4)(D) - whether employees of testifying experts are properly non-testifying experts	Case Organization, Planning and Strategy
10/17/2022	Travis Close	1.1	\$850	\$935	Draft memo/email to MTJ, GBW re: analysis of protections afforded to employees of non-testifying experts under Rule 26(b)(4)(D)	Case Organization, Planning and Strategy
10/18/2022	Guy Wallace	0.4	\$1,350	\$540	review and analysis of draft motion to compel re Anderson materials; com's with MTJ re same	Other Motions
10/18/2022	Mark Johnson	0.3	\$1,150	\$345	review research from TCC re discovery from non-testifying experts and coms w/ him re same and re ljoint ltr brief, declaration	Other Motions
10/18/2022	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re joint lltr brief to compel Anderson docs, revisions to same, mertis of arguments	Other Motions
10/18/2022	Mark Johnson	5.5	\$1,150	\$6,325	re-write P section of joint letter brief iso mtn to compel Anderson dcoss; research re same.	Other Motions
10/18/2022	Rachel Steyer	6.8	\$750	\$5,100	ongoing ADA standing research	Misc. Research
10/18/2022	Travis Close	2.2	\$850	\$1,870	Legal research re: whether Rule 26(b)(4)(D) protects assistants of experts retained for the purposes of class certification proceedings	Case Organization, Planning and Strategy
10/18/2022	Travis Close	0.3	\$850	\$255	Email to MTJ re: revisions to joint letter brief on Anderson discovery	Case Organization, Planning and Strategy
10/18/2022	Travis Close	0.2	\$850	\$170	Email to RLS re: revised joint letter brief on Anderson discovery	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/18/2022	Travis Close	0.5	\$850	\$425	Revisions to draft joint letter brief on photos/reports of Anderson's team of surveyors	Case Organization, Planning and Strategy
10/18/2022	Travis Close	1.8	\$850	\$1,530	Legal research on whether an expert's assistants' survey work product is discoverable when the expert is retained for work before trial	Case Organization, Planning and Strategy
10/19/2022	Mark Johnson	1.8	\$1,150	\$2,070	further revisions to joint ltr brief re Anderson docs based on authorities from AX, finalize and send to OC w/ cover	Other Motions
10/19/2022	Rachel Steyer	7.0	\$750	\$5,250	ongoing ADA standing research project	Misc. Research
10/19/2022	Travis Close	0.5	\$850	\$425	Review and analyze changes by RBGG to joint letter brief; review final version of JLB filed with Court	Case Organization, Planning and Strategy
10/19/2022	Travis Close	0.2	\$850	\$170	Email to team re: further revisions to joint letter brief on Anderson discovery	Case Organization, Planning and Strategy
10/20/2022	Rachel Steyer	4.4	\$750	\$3,300	ongoing ADA stnading research	Misc. Research
10/20/2022	Travis Close	0.2	\$850	\$170	Email to RLS re: follow-up needed with class member Sally Culver	Case Organization, Planning and Strategy
10/20/2022	Travis Close	0.5	\$850	\$425	Review and analyze communications history with class member Sally Culver	Case Organization, Planning and Strategy
10/20/2022	Travis Close	0.4	\$850	\$340	Call with class member Sally Culver re: update on case/litigation status	Class Outreach and Contact
10/21/2022	Guy Wallace	0.4	\$1,350	\$540	review and analysis of Brookdale's reply brief re motion to stay discovery	Other Motions
10/21/2022	Rachel Steyer	5.0	\$750	\$3,750	ongoing ADA standing research	Misc. Research
10/21/2022	Rachel Steyer	0.4	\$750	\$300	reviewing defendants' reply ISO motion to stay discovery	Other Motions
10/21/2022	Travis Close	0.7	\$850	\$595	Call with family member Linda Looney re: sharing story of father at Brookdlae & requesting update on status of case	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/21/2022	Travis Close	0.5	\$850	\$425	Review and analyze prior communications/declarations of family member Linda Looney (Patrick Looney)	Case Organization, Planning and Strategy
10/24/2022	Mark Johnson	1.7	\$1,150	\$1,955	read cases addressing successor liability for ADA and Title 24/state law violations	Misc. Research
10/24/2022	Mark Johnson	0.5	\$1,150	\$575	review and analyze D reply iso mtn to stay discovery	Other Motions
10/24/2022	Mark Johnson	0.1	\$1,150	\$115	email to OC re d section of ltr brief re Anderson docs	Other Motions
10/24/2022	Rachel Steyer	7.2	\$750	\$5,400	ongoing standing ADA research	Misc. Research
10/24/2022	Travis Close	0.3	\$850	\$255	Email to LEC re: list of assignments for this week	Case Organization, Planning and Strategy
10/25/2022	Travis Close	0.4	\$850	\$340	Email to MTJ re: updates to latest version of joint letter brief on Anderson discovery	Case Organization, Planning and Strategy
10/25/2022	Travis Close	0.2	\$850	\$170	Email to RLS re: contacted by class member Denise Anderson about status update	Case Organization, Planning and Strategy
10/25/2022	Travis Close	0.2	\$850	\$170	Review and analyze history of communications from class member Denise Anderson	Case Organization, Planning and Strategy
10/26/2022	Mark Johnson	0.4	\$1,150	\$460	mtg w/ TCC re projects to be undertaken pending ruling on class cert motion; analysis of discovery status, outstanding issues, etc.	Case Organization, Planning and Strategy
10/26/2022	Mark Johnson	0.6	\$1,150	\$690	review and analyze D's revisions to joint ltr brief re Anderson docs; prepare compare doc of same; draft email to COC re same and input as to whether further revisions needed.	Other Motions
10/26/2022	Travis Close	0.7	\$850	\$595	Review and analyze updated facility evaluation reports and complaint investigation reports issued for Chatsworth, Irvine, Brookdale Place of San Marcos, Oceanside, Tracy, Windsor, and Chanate facilities	Case Organization, Planning and Strategy
10/26/2022	Travis Close	0.4	\$850	\$340	Review and analyze Def's reply in support of motion to stay discovery	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/26/2022	Travis Close	0.6	\$850	\$510	Meet with MTJ re: upcoming assignments/discovery that is not dependent on class certification	Case Organization, Planning and Strategy
10/27/2022	Mark Johnson	0.4	\$1,150	\$460	finalize joint ltr re Anderson docs; draft email to COC and then to OC re same; com w/ LEC re exhibits.	Other Motions
10/27/2022	Rachel Steyer	6.1	\$750	\$4,575	ongoing ADA standing research	Misc. Research
10/27/2022	Travis Close	2.3	\$850	\$1,955	Review and analyze Def's privilege log to note items retained by Anderson's team of surveyors	Case Organization, Planning and Strategy
10/27/2022	Travis Close	0.2	\$850	\$170	Email to MTJ re: Brookdale assignments for next week	Case Organization, Planning and Strategy
10/27/2022	Travis Close	0.4	\$850	\$340	Review and analyze updated joint letter brief on Anderson discovery; revisions/additions/grammar check	Case Organization, Planning and Strategy
10/27/2022	Travis Close	0.3	\$850	\$255	Email to RLS re: callback needed for class member Linda Niles	Case Organization, Planning and Strategy
10/27/2022	Travis Close	0.4	\$850	\$340	Call from class member Linda Niles re: update on status of litigation	Case Organization, Planning and Strategy
10/28/2022	Rachel Steyer	1.2	\$750	\$900	received call from family member of resident, discussed her personal situation and case to try to determine class member status	Class Outreach and Contact
10/28/2022	Rachel Steyer	0.6	\$750	\$450	reviewing Relativity for documents pertaining to family member of caller to try to ascertain class member status	Class Outreach and Contact
10/28/2022	Rachel Steyer	6.0	\$750	\$4,500	ongoing ADA standing research project	Misc. Research
10/28/2022	Travis Close	0.2	\$850	\$170	Review and analyze final version of joint discovery letter re Anderson discovery before filing	Case Organization, Planning and Strategy
10/28/2022	Travis Close	0.3	\$850	\$255	legal research re: whether a disclosed expert's work product is protected under Rule 26(b)(4)(D)	Case Organization, Planning and Strategy
10/31/2022	Mark Johnson	0.1	\$1,150	\$115	call w/ GBW re discovery dispute re Anderson docs, chambers copies and hearing date on MTC and on MT stay discovery	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/31/2022	Rachel Steyer	5.0	\$750	\$3,750	ongoing ADA standing research	Misc. Research
11/1/2022	Mark Johnson	0.5	\$1,150	\$575	call w/ Rita Stiner re recent developments with Stacy	Class Outreach and Contact
11/1/2022	Rachel Steyer	7.0	\$750	\$5,250	ongoing ADA standing research	Misc. Research
11/2/2022	Rachel Steyer	5.1	\$750	\$3,825	onigoing ADA standing research project	Misc. Research
11/2/2022	Travis Close	1.8	\$850	\$1,530	legal research re: whether a disclosed expert's work product is protected under Rule 26(b)(4)(D)	Case Organization, Planning and Strategy
11/2/2022	Travis Close	0.3	\$850	\$255	Email to LEC re: discovery assignments for this week	Case Organization, Planning and Strategy
11/2/2022	Travis Close	0.6	\$850	\$510	Review and analyze recent facility evaluation and complaint investigation reports issued for Riverwalk, Gardens of Tarzana, Alhambra, Sylvan Ranch, Oceanside and Lodi facilities	Case Organization, Planning and Strategy
11/3/2022	Rachel Steyer	0.3	\$750	\$225	call with class member declarant to provide update about case	Class Outreach and Contact
11/3/2022	Rachel Steyer	7.0	\$750	\$5,250	ongoing ADA standing research project	Misc. Research
11/3/2022	Travis Close	0.3	\$850	\$255	Email to MTJ re: tracking discovery responses for latest RFPs/RFAs	Case Organization, Planning and Strategy
11/3/2022	Travis Close	0.6	\$850	\$510	Review and analyze recent litigation updates in similar cases Bright v. Brookdale and Gunza v. Brookdale	Case Organization, Planning and Strategy
11/4/2022	Rachel Steyer	6.0	\$750	\$4,500	ongoing ADA standing research project	Misc. Research
11/7/2022	Mark Johnson	0.8	\$1,150	\$920	review email and article at link from COC re LTC Properties response to rumors of brookdale sale; research other sites re rumors of sale, leases, LTC properties w/ brookdale leases; email to GBW with summary.	Misc. Research
11/7/2022	Rachel Steyer	4.5	\$750	\$3,375	ongoing ADA standing research project	Misc. Research
11/7/2022	Travis Close	0.8	\$850	\$680	Call with family member Carrie Brody re: update on litigation status and opportunities for participation	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/7/2022	Travis Close	0.4	\$850	\$340	Analyze history of communications with family member Carrie Brody and her father	Case Organization, Planning and Strategy
11/7/2022	Travis Close	0.2	\$850	\$170	Review and analyze evidence of 13% rate increase at Brookdale Scotts Valley	Case Organization, Planning and Strategy
11/8/2022	Guy Wallace	0.3	\$1,350	\$405	review and analysis of court order re hearing on motion to stay; com's with JY; MTJ re same	Other Motions
11/8/2022	Rachel Steyer	7.1	\$750	\$5,325	ongoing ADA standing research project	Misc. Research
11/8/2022	Travis Close	0.2	\$850	\$170	Email to LEC re: question about case deadlines for motion to stay	Case Organization, Planning and Strategy
11/8/2022	Travis Close	0.4	\$850	\$340	Email to MTJ re: further organization of discovery responses	Case Organization, Planning and Strategy
11/8/2022	Travis Close	0.4	\$850	\$340	Call with Doug Cross re: update on status of litigation and next steps	Case Organization, Planning and Strategy
11/8/2022	Travis Close	0.6	\$850	\$510	Analyze Brookdale's recent SEC filings for info on resident occupancy levels	Case Organization, Planning and Strategy
11/9/2022	Mark Johnson	0.2	\$1,150	\$230	coms w/ R Stiner about rent and fee increase and communications with manager	Case Organization, Planning and Strategy
11/9/2022	Rachel Steyer	0.8	\$750	\$600	ongoing ADA standing research project	Misc. Research
11/9/2022	Rachel Steyer	7.0	\$750	\$5,250	ongoing ADA standing research project	Misc. Research
11/9/2022	Travis Close	0.6	\$850	\$510	Call with LEC re: assignments due for this Friday	Case Organization, Planning and Strategy
11/10/2022	Rachel Steyer	7.2	\$750	\$5,400	ongoing ADA standing research project and drafting	Misc. Research
11/11/2022	Mark Johnson	0.2	\$1,150	\$230	Call from GBW re timing of decision on class cert motion and discovery, co-counsel issues	Case Organization, Planning and Strategy
11/14/2022	Rachel Steyer	5.0	\$750	\$3,750	ongoing ADA standing research and drafting memo	Misc. Research
11/15/2022	Rachel Steyer	7.5	\$750	\$5,625	ongoing ADA standing research project and drafting	Misc. Research
11/15/2022	Travis Close	0.7	\$850	\$595	Review and analyze updated facility evaluation and complaint investigation reports from San Jose, Redwood City, Tracy, San Marcos, Uptown Whittier, Ocean House, Alhambra facilities	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/16/2022	Mark Johnson	0.9	\$1,150	\$1,035	calls (x2) w/ COC AX re strategy for oral argument on mtn to compel Anderson documents, further areas to research or review.	Other Motions
11/16/2022	Rachel Steyer	7.1	\$750	\$5,325	ongoing ADA standing research and drafting	Misc. Research
11/16/2022	Travis Close	2.4	\$850	\$2,040	Review and analyze Defendants' privilege log at dispute in pending joint discovery letter brief in advance of tomorrow's hearing with Judge Beeler	Case Organization, Planning and Strategy
11/16/2022	Travis Close	0.3	\$850	\$255	Email to GBW re: prepping for tomorrow's hearing with magistrate Judge Beeler	Case Organization, Planning and Strategy
11/17/2022	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re hearing with MJ Beeler re motion to compel expert photos and other materials	Discovery (Non-Deposition)
11/17/2022	Mark Johnson	2.0	\$1,150	\$2,300	zoom hearing on discovery motion re Anderson photographs and documents; continue review of relevant docs during wait time.	Other Motions
11/17/2022	Mark Johnson	0.3	\$1,150	\$345	brief GBW or results of discovery hearing and discuss next steps, possible timing of class cert ruling	Other Motions
11/17/2022	Mark Johnson	0.2	\$1,150	\$230	post hearing call w/ COC AX re results of discovery zoom hearing, interpretation of statements by court, next steps re doc production and follow up.	Other Motions
11/17/2022	Mark Johnson	0.8	\$1,150	\$920	review memo from COC AX re arguments and authorities for discovery mtn, call w/ her re same.	Other Motions
11/17/2022	Mark Johnson	0.7	\$1,150	\$805	pre-hearing prep for argument on mtn for production of Anderson docs	Other Motions
11/17/2022	Rachel Steyer	7.0	\$750	\$5,250	ongoing ADA standing research project and drafting of memo	Misc. Research
11/17/2022	Travis Close	0.3	\$850	\$255	Email to LEC re: request for info on Def's experts' photographs before today's discovery meeting	Case Organization, Planning and Strategy
11/18/2022	Guy Wallace	0.6	\$1,350	\$810	review and analysis of order from MJ Beeler re production of expert photographs; com's with MTJ re further discovery pending class certification decision	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/18/2022	Rachel Steyer	7.1	\$750	\$5,325	ongoing ADA standing research project and drafting	Misc. Research
11/18/2022	Travis Close	0.8	\$850	\$680	Call with class member Donna Proctor re: update on status of litigation and expectations from court	Case Organization, Planning and Strategy
11/18/2022	Travis Close	0.3	\$850	\$255	Email to LEC re: assignments for next week	Case Organization, Planning and Strategy
11/18/2022	Travis Close	2.2	\$850	\$1,870	Review and analyze Def's privilege log for photos taken by employees working for their expert, George Mendez and Michelle Winnecke	Case Organization, Planning and Strategy
11/18/2022	Travis Close	0.2	\$850	\$170	Email to MTJ re: question about Def's privilege log	Case Organization, Planning and Strategy
11/21/2022	Rachel Steyer	5.5	\$750	\$4,125	ongoing ADA standing research project and drafting	Misc. Research
11/22/2022	Mark Johnson	0.3	\$1,150	\$345	review transcript of hearing on motion to produce Anderson photos and documents; email to OC re production date	Other Motions
11/22/2022	Rachel Steyer	6.0	\$750	\$4,500	ongoing ADA standing research project and drafting	Misc. Research
11/23/2022	Rachel Steyer	5.0	\$750	\$3,750	ongoing ADA standing research project and drafting	Misc. Research
11/28/2022	Travis Close	0.4	\$850	\$340	Email to LEC re: tasks regarding updating discovery responses received	Case Organization, Planning and Strategy
11/28/2022	Travis Close	0.3	\$850	\$255	Email to GBW re: ideas for additional discovery to request	Case Organization, Planning and Strategy
11/28/2022	Travis Close	0.5	\$850	\$425	Call with class member Ronda Wiseman re: update status of litigation efforts	Class Outreach and Contact
11/29/2022	Mark Johnson	0.1	\$1,150	\$115	review email from COC re communication with opposing counsel; com w/ GBW re same	Case Organization, Planning and Strategy
11/29/2022	Travis Close	0.4	\$850	\$340	Review and analyze transcript of 11/17 discovery hearing for info on deadline for Defs to produce photos at dispute	Case Organization, Planning and Strategy
11/30/2022	Guy Wallace	2.3	\$1,350	\$3,105	review and analysis of com's from Lee and KAS re settlement; com's with MTJ re same and response thereto	Settlement

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/30/2022	Mark Johnson	0.4	\$1,150	\$460	calls (x2) w/ GBW re response to OC inquiry to K Stebner re settlement, positions in prior mediation	Case Organization, Planning and Strategy
11/30/2022	Travis Close	1.3	\$850	\$1,105	Update master facility spreadsheet with recent info on facilities divested/opened, name changes, status, citations, etc. (Alhambra - Central Whittier)	Case Organization, Planning and Strategy
11/30/2022	Travis Close	1.6	\$850	\$1,360	Investigate status of Brookdale's efforts to divest from ownership and management of RCFE facilities in California	Case Organization, Planning and Strategy
11/30/2022	Travis Close	1.8	\$850	\$1,530	Review and analyze latest privilege log for information on measurements taken at facilities not attended by Mr. Anderson	Case Organization, Planning and Strategy
12/1/2022	Guy Wallace	0.4	\$1,350	\$540	com's with RLS re Defendants' arguments re injury-in-fact; recent decisions re scope of TransUnion decision	Class Certification
12/1/2022	Guy Wallace	0.3	\$1,350	\$405	com's with TCC re status of discovery and remaining discovery that has not been produced by Defendants; time-period of non-production	Discovery (Non-Deposition)
12/1/2022	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of settlement position; preparation of email to KAS re same; com's with MTJ re same	Settlement
12/1/2022	Rachel Steyer	0.2	\$750	\$150	call with class member declarant to provide update about case status	Class Outreach and Contact
12/1/2022	Rachel Steyer	6.9	\$750	\$5,175	ongoing ADA standing research project	Misc. Research
12/1/2022	Rachel Steyer	0.3	\$750	\$225	call with GBW to discuss update on standing project	Misc. Research
12/1/2022	Travis Close	1.6	\$850	\$1,360	Update master spreadsheet with info on recently divested facilities, name changes, management changes, etc (Central Whittier - Irvine)	Case Organization, Planning and Strategy
12/1/2022	Travis Close	1.7	\$850	\$1,445	Update master spreadsheet with info on recently divested facilities, name changes, management changes, etc (Irvine-Riverwalk)	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/1/2022	Travis Close	1.4	\$850	\$1,190	Update master spreadsheet with info on recently divested facilities, name changes, management changes, etc (Riverwalk-Yorba Linda)	Case Organization, Planning and Strategy
12/1/2022	Travis Close	0.8	\$850	\$680	Call with GBW re: discovery project assignments for this month	Discovery (Non-Deposition)
12/2/2022	Mark Johnson	0.5	\$1,150	\$575	call w/ GBW re settlement prospects, merits of case and work to be done post certification.	Case Organization, Planning and Strategy
12/2/2022	Travis Close	1.4	\$850	\$1,190	Research and analyze extent of acquisition of CA Brookdale facilities by Avista Senior Living Inc	Case Organization, Planning and Strategy
12/2/2022	Travis Close	2.5	\$850	\$2,125	Update master facility spreadsheet with info on recently divested facilities (ownership, licensee names, capacity)	Case Organization, Planning and Strategy
12/5/2022	Mark Johnson	0.1	\$1,150	\$115	review email from TCC updating status of Brookdale operated facilities.	Case Organization, Planning and Strategy
12/5/2022	Rachel Steyer	0.6	\$750	\$450	received call back from family member of current resident, discussed case and issues	Class Outreach and Contact
12/5/2022	Rachel Steyer	6.3	\$750	\$4,725	ongoing ADA standing research project	Misc. Research
12/5/2022	Travis Close	1.3	\$850	\$1,105	Review and analyze Brookdale's SEC filings for 2021-2022 to determine transition dates for recently divested CA facilities	Case Organization, Planning and Strategy
12/5/2022	Travis Close	0.6	\$850	\$510	Email to team re update on status of Brookdale's CA facilities	Discovery (Non-Deposition)
12/6/2022	Rachel Steyer	6.9	\$750	\$5,175	ongoing ADA standing research project	Misc. Research
12/6/2022	Travis Close	2.4	\$850	\$2,040	Begin outlining memo on discovery status by analyzing the largest previous discovery projects to-date	Case Organization, Planning and Strategy
12/6/2022	Travis Close	2.1	\$850	\$1,785	Review and analyze discovery orders by Judge Beeler; create chart outlining defendant's obligation to produce documents	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/6/2022	Travis Close	0.5	\$850	\$425	Review and analyze joint stipulations between parties to determine Defendants' obligations to timely respond to discovery requests	Case Organization, Planning and Strategy
12/6/2022	Travis Close	1.3	\$850	\$1,105	Analyze sufficiency of template residency agreements produced by Brookdale compared to forms in residency agreement database	Discovery (Non-Deposition)
12/7/2022	Rachel Steyer	4.6	\$750	\$3,450	ongoign ADA standing research	Misc. Research
12/7/2022	Travis Close	0.6	\$850	\$510	Call with class member/family member Jenny Niles re: status of case and next steps for participation	Case Organization, Planning and Strategy
12/8/2022	Travis Close	1.2	\$850	\$1,020	Meet with MTJ re: recent Brookdale closures; staffing violations with DSS; discovery projects	Case Organization, Planning and Strategy
12/8/2022	Travis Close	2.4	\$850	\$2,040	Discovery outlining/update -- Review and analyze archived communications from 2019-2020 regarding discovery issues	Case Organization, Planning and Strategy
12/8/2022	Travis Close	1.3	\$850	\$1,105	Review and analyze production of Brookdale vehicle licenses/lists (resident transportation) to determine scope of RFPs needed	Case Organization, Planning and Strategy
12/8/2022	Travis Close	1.5	\$850	\$1,275	Review and analyze discovery joint letter briefs from 2019-2020 to recover deficient responses and discovery that needs updating	Case Organization, Planning and Strategy
12/9/2022	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re testimony of Dr. Flores and use of further staffing expert; staffing analysis of named Plaintiff facilities; Defendants' production of photographs	Discovery (Non-Deposition)
12/9/2022	Rachel Steyer	2.9	\$750	\$2,175	ongoing ADA standing research	Misc. Research
12/12/2022	Rachel Steyer	2.7	\$750	\$2,025	ongoing ADA standing research project	Misc. Research
12/12/2022	Travis Close	1.3	\$850	\$1,105	Analyze status of Brookdale's discovery responses to items briefed in July 10, 2019 joint letter brief to Judge Beeler; whether updates are needed	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/12/2022	Travis Close	2.1	\$850	\$1,785	Begin drafting chart compiling information/history of joint discovery letter briefs, meetings & orders (Dkt Nos. 1-172)	Case Organization, Planning and Strategy
12/12/2022	Travis Close	0.2	\$850	\$170	Email to LEC re: new discovery assignments for this week	Case Organization, Planning and Strategy
12/12/2022	Travis Close	1.8	\$850	\$1,530	Analyze status of discovery production in issues identified in parties' 7/28/20 joint discovery letter brief	Discovery (Non-Deposition)
12/12/2022	Travis Close	1.8	\$850	\$1,530	Continue drafting chart compiling information/history of joint discovery letter briefs, meetings & orders (Dkt Nos. 172-345)	Discovery (Non-Deposition)
12/13/2022	Mark Johnson	2.5	\$1,150	\$2,875	further investigation and review of docs/images produced by D per court order on Anderson production; coms w/ Ryan Bonner re same; review metadata and pdf files	Discovery (Non-Deposition)
12/13/2022	Mark Johnson	0.2	\$1,150	\$230	draft email to GBW, TCC, RLS re docs produced by Ds	Discovery (Non-Deposition)
12/13/2022	Rachel Steyer	6.6	\$750	\$4,950	ongoing ADA standing research project	Misc. Research
12/13/2022	Travis Close	2.3	\$850	\$1,955	Continue drafting chart compiling information/history of joint discovery letter briefs, meetings & orders (Dkt Nos. 345-end)	Case Organization, Planning and Strategy
12/13/2022	Travis Close	0.7	\$850	\$595	Review and analyze Unit Turn Fixtures & Finishes design catalog for evidence of centralization of policies re unit alterations	Case Organization, Planning and Strategy
12/13/2022	Travis Close	1.8	\$850	\$1,530	Review and analyze prior communications regarding subpoenas to DSS regional Offices; production scope and timing; and objections by DSS, for discovery update	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/13/2022	Travis Close	1.4	\$850	\$1,190	Research memo on status of discovery -- draft summary of requests to and productions received from Cal DSS regarding Brookdale facility licenses files	Case Organization, Planning and Strategy
12/13/2022	Travis Close	0.8	\$850	\$680	Analyze composition of first production by Cal DSS & summarize categories of docs for discovery review memo	Case Organization, Planning and Strategy
12/14/2022	Rachel Steyer	3.4	\$750	\$2,550	ongoign ADA standing research project	Misc. Research
12/14/2022	Travis Close	1.2	\$850	\$1,020	Review and analyze dates and communications re: second production of facility files from Cal DSS	Case Organization, Planning and Strategy
12/14/2022	Travis Close	0.3	\$850	\$255	Email to MTJ re: question about earlier communications with DSS contact	Case Organization, Planning and Strategy
12/14/2022	Travis Close	0.8	\$850	\$680	Review, analyze, and summarize content of 2021 DSS production for discovery memo	Case Organization, Planning and Strategy
12/14/2022	Travis Close	0.5	\$850	\$425	Analyze recent team meeting notes for discovery items that are most urgent v. less urgent to pursue	Case Organization, Planning and Strategy
12/14/2022	Travis Close	0.4	\$850	\$340	Review and analyze photos taken of Plaintiff Stiner's room, individual common areas and parking lots, and sidewalks at Brookdale San Ramon, by Douglas Anderson's team	Case Organization, Planning and Strategy
12/14/2022	Travis Close	1.1	\$850	\$935	Review, analyze, and summarize Plf's subpoena to DSS centralized application bureau for docs and subsequent production	Case Organization, Planning and Strategy
12/14/2022	Travis Close	0.4	\$850	\$340	Analyze team meeting minutes from 2021 for info/dates on PRA requests made to cities and counties	Case Organization, Planning and Strategy
12/14/2022	Travis Close	0.6	\$850	\$510	Review dates and content of correspondence from local jurisdictions re building records and summarize for discovery status memo	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/14/2022	Travis Close	1.3	\$850	\$1,105	Review, analyze, and summarize history of site inspections and related meet & confer/joint letter briefings regarding facility site inspections	Case Organization, Planning and Strategy
12/15/2022	Travis Close	0.9	\$850	\$765	Analyze documented complaints by resident Tina Solinas to determine date of initial productions by Brookdale	Case Organization, Planning and Strategy
12/15/2022	Travis Close	0.8	\$850	\$680	Search for "Issue Register" to determine scope and dates of complaint databases produced by Brookdale	Case Organization, Planning and Strategy
12/15/2022	Travis Close	0.3	\$850	\$255	Email to GBW re: question about standardized language in form residency agreements	Case Organization, Planning and Strategy
12/15/2022	Travis Close	1.2	\$850	\$1,020	Analyze our efforts to obtain the complete residency agreement database for discovery memo	Case Organization, Planning and Strategy
12/15/2022	Travis Close	0.6	\$850	\$510	Review and analyze Plf's requests for paper copy residency agreements for discovery memo	Case Organization, Planning and Strategy
12/15/2022	Travis Close	1.3	\$850	\$1,105	Review, analyze and summarize status of Brookdale's production of complaints/complaint databases, for discovery memo	Discovery (Non-Deposition)
12/15/2022	Travis Close	1.4	\$850	\$1,190	Review, analyze and summarize hisotory of Def's production of form residency agreements for discovery memo	Discovery (Non-Deposition)
12/16/2022	Rachel Steyer	3.6	\$750	\$2,700	finalizing ADA standing memo	Misc. Research
12/16/2022	Travis Close	1.2	\$850	\$1,020	Review and analyze evidence of date at which Brookdale created the electronic residency agreement database and mandated compliance	Case Organization, Planning and Strategy
12/16/2022	Travis Close	1.1	\$850	\$935	Analyze history of our requests for the software/algorithms underlying the brookdale norms, community customizations, etc. for discovery memo	Case Organization, Planning and Strategy
12/16/2022	Travis Close	1.3	\$850	\$1,105	Search for all hard copies/dates of Emergency Manual to determine the extent to which supplementation is necessary	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/16/2022	Travis Close	1.5	\$850	\$1,275	Review and analyze the status of efforts to obtain the brookdale norms and algorithms underlying the norms	Case Organization, Planning and Strategy
12/16/2022	Travis Close	1.3	\$850	\$1,105	Analyze history of production of the Brookdale Norms, meet and confer, and joint letter briefs associated with same	Discovery (Non-Deposition)
12/19/2022	Rachel Steyer	0.2	\$750	\$150	email to GBW summarizing status of preliminary disclosures	Discovery (Non-Deposition)
12/19/2022	Rachel Steyer	0.3	\$750	\$225	reviewing status of declarant authorization forms, preparing email to GBW and MTJ	Discovery (Non-Deposition)
12/19/2022	Travis Close	0.9	\$850	\$765	Review and analyze complaint investigation and facility evaluation reports for North Fremont, Chatsworth, Auburn, Folsom, Clairemont, Oceanside, Lodi, and Chanate facilities	Case Organization, Planning and Strategy
12/19/2022	Travis Close	1.3	\$850	\$1,105	Draft update on status of facilities for which a notice of inspection was issued, but which have not yet been inspected	Discovery (Non-Deposition)
12/20/2022	Travis Close	0.5	\$850	\$425	Review and analyze updated facility evaluation reports and complaint investigation reports issued by DSS for Riverwalk, Murrieta, North Euclid, and Clairemont facilities	Case Organization, Planning and Strategy
12/20/2022	Travis Close	2.3	\$850	\$1,955	Analyze Brookdale's production of fire drills to date, including facilities covered/missing and supplementation needed	Discovery (Non-Deposition)
12/20/2022	Travis Close	2.1	\$850	\$1,785	Analyze history of communications to determine Def's compliance with promised to ask facility executive directors for all available policies at the facility level	Discovery (Non-Deposition)
12/20/2022	Travis Close	0.7	\$850	\$595	Edits to section of discovery memo on status of Brookdale's production of emergency evacuation plans	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/20/2022	Travis Close	1.3	\$850	\$1,105	Review history of efforts to obtain accessible transportation docs from Defs; M/c and joint letter briefs	Discovery (Non-Deposition)
12/21/2022	Travis Close	0.9	\$850	\$765	Relativity search documenting & organizing all known versions of the Fleet Safety Policy	Discovery (Non-Deposition)
12/21/2022	Travis Close	1.9	\$850	\$1,615	Analyze evidence of local transportation policies proffered by Brookdale in Opposition brief, and whether it amount to anything more than schedules/sign-in sheets, for discovery status memo	Discovery (Non-Deposition)
12/21/2022	Travis Close	2.3	\$850	\$1,955	Analysis of complaints database for number of residents who complained about deficient transportation services due to shortage of drivers	Discovery (Non-Deposition)
12/21/2022	Travis Close	1.7	\$850	\$1,445	Summarize Def's efforts to produce docs regarding accessible transportation & outstanding deficiencies in discovery status memo	Discovery (Non-Deposition)
12/22/2022	Travis Close	2.4	\$850	\$2,040	Review and analyze record of communications, transcripts, and Def's objections regarding the "happy camper" depositions	Depositions
12/22/2022	Travis Close	1.9	\$850	\$1,615	Analyze transcripts of plaintiffs' depositions for relevant admissions and inconsistencies (for discovery summary memo)	Depositions
12/22/2022	Travis Close	2.2	\$850	\$1,870	Analysis of 30(b)(6) depo transcripts for info on important topics covered and not yet covered that were subject to the Notice of Rule 30 depo (for discovery summary memo)	Discovery (Non-Deposition)
12/23/2022	Travis Close	2.2	\$850	\$1,870	Draft section on depositions (30(b)(6), plaintiff depositions, happy campers) for discovery status memo	Case Organization, Planning and Strategy
12/28/2022	Rachel Steyer	0.6	\$750	\$450	received call from Brookdale caller, discussed case and answered questions	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/28/2022	Rachel Steyer	0.4	\$750	\$300	returned call to Brookdale caller from yesterday, discussed issues and answered questions	Class Outreach and Contact
1/3/2023	Guy Wallace	0.2	\$1,350	\$270	com's with RLS; MTJ re follow up re production of resident files	Discovery (Non-Deposition)
1/3/2023	Guy Wallace	0.6	\$1,350	\$810	legal research and analysis of DOJ Guidance re 2010 ADAS and issues re application thereof	Misc. Research
1/3/2023	Rachel Steyer	0.4	\$750	\$300	received call back from class member declarant; provided update about the case and updated her contact info	Class Outreach and Contact
1/3/2023	Rachel Steyer	0.3	\$750	\$225	received call from Brookdale caller, had questions about case status	Class Outreach and Contact
1/3/2023	Rachel Steyer	0.4	\$750	\$300	reviewing and organizing reply declarant authorization files	Discovery (Non-Deposition)
1/3/2023	Rachel Steyer	0.3	\$750	\$225	reviewing notes/spreadsheet tracking RFPs corresponding to reply declarants	Discovery (Non-Deposition)
1/3/2023	Rachel Steyer	0.3	\$750	\$225	sent updated/revised HIPAA authorization forms to declarant	Discovery (Non-Deposition)
1/3/2023	Travis Close	1.3	\$850	\$1,105	Research rules and regulations promulgated by the DSS Community Care Licensing division regarding COVID-19 testing requirements for RCFE/assisted living	Case Organization, Planning and Strategy
1/3/2023	Travis Close	1.9	\$850	\$1,615	Research CDSS's Index of Precedential Decisions for cases involving denial of care due to understaffing	Case Organization, Planning and Strategy
1/3/2023	Travis Close	2.3	\$850	\$1,955	Analyze changes made to Brookdale's policy and procedure manual between years of 2019-2021.	Case Organization, Planning and Strategy
1/4/2023	Rachel Steyer	1.3	\$750	\$975	re-reviewing and updating RFP declarant tracking spreadsheet	Discovery (Non-Deposition)
1/4/2023	Rachel Steyer	0.2	\$750	\$150	call with Barbara Kwoka to re-establish contact and inform her of need to re-send corrected authorization forms	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/4/2023	Rachel Steyer	0.3	\$750	\$225	combining/correcting Barbara Kwoka declarant authorization docs	Discovery (Non-Deposition)
1/4/2023	Rachel Steyer	0.2	\$750	\$150	call with declarant's daughter to discuss re-sending corrected authorization forms	Discovery (Non-Deposition)
1/4/2023	Rachel Steyer	0.2	\$750	\$150	call with reply declarant Deborah Harkins to notify her of need to re-send corrected authorization form	Discovery (Non-Deposition)
1/4/2023	Rachel Steyer	0.2	\$750	\$150	received call back from declarant Jenny Markgraff, discussed update and resending of corrected authorization forms	Discovery (Non-Deposition)
1/4/2023	Rachel Steyer	0.2	\$750	\$150	response to declarant Diana Jones and sister concerning status of resending corrected authorization forms	Discovery (Non-Deposition)
1/4/2023	Rachel Steyer	0.2	\$750	\$150	call back with declarant about transmitting POA docs	Discovery (Non-Deposition)
1/4/2023	Rachel Steyer	0.2	\$750	\$150	preparing corrected versions of authorization forms for Barry Shapiro	Discovery (Non-Deposition)
1/4/2023	Rachel Steyer	0.2	\$750	\$150	correcting and preparing new authorization forms for declarant Deborah Harkins	Discovery (Non-Deposition)
1/4/2023	Rachel Steyer	0.2	\$750	\$150	preparing and sending updated authorization forms to declarant Diane Jones	Discovery (Non-Deposition)
1/4/2023	Rachel Steyer	0.2	\$750	\$150	correcting and updating authorization forms for declarant Jane Erwin	Discovery (Non-Deposition)
1/4/2023	Rachel Steyer	0.2	\$750	\$150	reviewing email from co-counsel summarizing questions pertaining to PMSJ concerning ADA barriers	Motion for Summary Judgment / Adjudication
1/4/2023	Travis Close	1.4	\$850	\$1,190	Draft section of discovery summary memo in BKD's production of policy and procedural manuals	Case Organization, Planning and Strategy
1/4/2023	Travis Close	1.7	\$850	\$1,445	Analyze depo transcript of Audrey Withers covering 30(b)(6) topic 12 for testimony on Brookdale's training materials	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/4/2023	Travis Close	0.7	\$850	\$595	Review and analyze depo outline for Withers to determine major topics for discovery on Brookdale's training	Case Organization, Planning and Strategy
1/4/2023	Travis Close	0.6	\$850	\$510	Analyze depo transcript of Audrey Withers covering 30(b)(6) topic 12 for testimony on Brookdale's corporate systems for organizing training courses	Case Organization, Planning and Strategy
1/4/2023	Travis Close	0.7	\$850	\$595	Analyze Index of ED Depo Training docs created by EPO to determine courses missing from BKD's productions	Case Organization, Planning and Strategy
1/4/2023	Travis Close	0.5	\$850	\$425	Review and analyze history of prior communications re: missing training docs for discovery summary memo	Case Organization, Planning and Strategy
1/4/2023	Travis Close	1.7	\$850	\$1,445	Draft section of discovery summary memo on Trainings (docs produced and missing)	Case Organization, Planning and Strategy
1/5/2023	Rachel Steyer	0.9	\$750	\$675	reviewing and updating RFP tracking spreadsheet	Discovery (Non-Deposition)
1/5/2023	Rachel Steyer	0.2	\$750	\$150	call with declarant Jessica Carpio to request POA docs	Discovery (Non-Deposition)
1/5/2023	Rachel Steyer	0.2	\$750	\$150	email to declarant Jane Erwin concerning need to re-send corrected authorization forms	Discovery (Non-Deposition)
1/5/2023	Rachel Steyer	0.2	\$750	\$150	call with declarant Diane Wadsworth-Woolley about resending POA docs	Discovery (Non-Deposition)
1/5/2023	Rachel Steyer	0.2	\$750	\$150	call with declarant Diane Edwards of need to re-send authorization forms	Discovery (Non-Deposition)
1/5/2023	Rachel Steyer	0.2	\$750	\$150	preparing corrected/updated authorization forms for declarant Diane Edwards	Discovery (Non-Deposition)
1/5/2023	Rachel Steyer	0.5	\$750	\$375	call with declarant Julie Von Waldegg, discussed case, answered questions, need to re-send authorization docs	Discovery (Non-Deposition)
1/5/2023	Rachel Steyer	0.2	\$750	\$150	preparing corrected authorization forms for declarant Julie Von Waldegg	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/5/2023	Rachel Steyer	0.2	\$750	\$150	preparing corrected authorization forms for declarant Robert Filner	Discovery (Non-Deposition)
1/5/2023	Rachel Steyer	0.2	\$750	\$150	preparing corrected authorization forms for declarant Stacy Sewell Rowe	Discovery (Non-Deposition)
1/5/2023	Rachel Steyer	0.5	\$750	\$375	reviewing all signed authorization forms and POA docs, combining any outstanding ones	Discovery (Non-Deposition)
1/5/2023	Travis Close	1.7	\$850	\$1,445	Review and analyze history of communications & meet and confer efforts between parties regarding our requests for data on employees authorized to provide direct care	Case Organization, Planning and Strategy
1/5/2023	Travis Close	1.7	\$850	\$1,445	Draft section of discovery status memorandum on efforts to obtain data on employees authorized to provide direct care at BKD facilities	Case Organization, Planning and Strategy
1/5/2023	Travis Close	1.6	\$850	\$1,360	Analyze timeline of history of discovery disputes, communications and productions of ESI	Case Organization, Planning and Strategy
1/5/2023	Travis Close	1.4	\$850	\$1,190	Draft section on ESI discovery disputes for discovery status memo	Case Organization, Planning and Strategy
1/5/2023	Travis Close	1.3	\$850	\$1,105	Review and analyze communications with co-counsel and staffing experts to determine extent of production of data re: contract labor used at the facilities for direct care	Discovery (Non-Deposition)
1/6/2023	Rachel Steyer	1.9	\$750	\$1,425	reviewing and double checking reply declarant POA docs	Discovery (Non-Deposition)
1/6/2023	Rachel Steyer	0.2	\$750	\$150	call with declarant Barry Shapiro to review need to re-send revised authorization docs	Discovery (Non-Deposition)
1/6/2023	Rachel Steyer	0.2	\$750	\$150	preparing corrected authorization forms for declarant Barry Shapiro	Discovery (Non-Deposition)
1/6/2023	Travis Close	2.3	\$850	\$1,955	Review and analyze extent of resident declarant records produced on Relativity since late 2021 and extent of missing records	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/6/2023	Travis Close	1.4	\$850	\$1,190	Draft section on discovery summary brief re: status of Def's efforts to produce resident declarant files requested	Case Organization, Planning and Strategy
1/6/2023	Travis Close	0.8	\$850	\$680	Analyze prior communications with doc reviewers, M/C efforts with Def's regarding plans of operations	Case Organization, Planning and Strategy
1/6/2023	Travis Close	1.2	\$850	\$1,020	Draft section of discovery status memo on plans of operation	Case Organization, Planning and Strategy
1/9/2023	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re analysis of access barriers for partial MSJ and questions from RBGG re same	Case Organization, Planning and Strategy
1/9/2023	Mark Johnson	1.9	\$1,150	\$2,185	locate and review recent production of photos and other documents, draft email to COC at RBGG explaining same	Other Motions
1/9/2023	Rachel Steyer	0.2	\$750	\$150	email to MTJ and GBW enclosed first batch of authorizations and draft letter	Communications With Opposing Counsel
1/9/2023	Rachel Steyer	0.9	\$750	\$675	reviewing and updating declarant RFP spreadsheet	Discovery (Non-Deposition)
1/9/2023	Rachel Steyer	0.3	\$750	\$225	email to declarant Anne Keck concerning authorization forms	Discovery (Non-Deposition)
1/9/2023	Rachel Steyer	0.2	\$750	\$150	preparing HIPAA authorization docs for declarant Jason Jonas	Discovery (Non-Deposition)
1/9/2023	Rachel Steyer	0.2	\$750	\$150	preparing authorization forms for Miguel Mendoza	Discovery (Non-Deposition)
1/9/2023	Travis Close	1.2	\$850	\$1,020	Review the analysis performed by doc reviewers of plans of operations located as branded Emeritus v. Brookdale; incorporate into discovery status memo	Case Organization, Planning and Strategy
1/9/2023	Travis Close	1.6	\$850	\$1,360	Draft section of discovery status memo on efforts to obtain Brookdale's record of access improvements at the facilities	Case Organization, Planning and Strategy
1/9/2023	Travis Close	0.7	\$850	\$595	Analyze history of meet and confer efforts, as well as the transcript of the hearing with judge beeler, regarding the deficient responses to requests for access improvements.	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/9/2023	Travis Close	1.3	\$850	\$1,105	Analyze depo testimony of Kevin Bowman regarding policies for remediating access barriers at the facilities	Discovery (Non-Deposition)
1/9/2023	Travis Close	0.7	\$850	\$595	Review and analyze history of parties' meet and confer efforts regarding production of the ownership/management/lease agreements	Discovery (Non-Deposition)
1/9/2023	Travis Close	0.4	\$850	\$340	Analyze history of production of written agreements and closely held documents on Relativity	Discovery (Non-Deposition)
1/9/2023	Travis Close	0.7	\$850	\$595	Draft section of discovery status memo on ownership/operation/management agreements.	Discovery (Non-Deposition)
1/10/2023	Mark Johnson	0.1	\$1,150	\$115	call w/ GBW re class composition, arbitration, agreements	Class Certification
1/10/2023	Rachel Steyer	0.3	\$750	\$225	preparing new MTJ letter to OC for declarant authorization forms	Communications With Opposing Counsel
1/10/2023	Rachel Steyer	0.3	\$750	\$225	email to GBW and MTJ with next batch of signed declarant authorizations	Communications With Opposing Counsel
1/10/2023	Rachel Steyer	0.2	\$750	\$150	email to declarant to confirm status of POA docs	Depositions
1/10/2023	Rachel Steyer	0.5	\$750	\$375	reviewing and updating notes in declarant RFP spreadsheet	Discovery (Non-Deposition)
1/10/2023	Rachel Steyer	0.2	\$750	\$150	received call back from Jenny Markgraff, confirmed transmit of POA docs	Discovery (Non-Deposition)
1/10/2023	Travis Close	1.2	\$850	\$1,020	Review and analyze new production of photographs from Anderson survey team, metadata, & additional ESI produced by Defendants pursuant to court order, for completeness	Discovery (Non-Deposition)
1/10/2023	Travis Close	0.7	\$850	\$595	Review the analysis performed by co-counsel on bank account information produced by Brookdale to-date	Discovery (Non-Deposition)
1/10/2023	Travis Close	1.4	\$850	\$1,190	Draft section of discovery status memo on bank accounts & financial information	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/11/2023	Mark Johnson	0.3	\$1,150	\$345	mtg and email exchange w/ RLS re class member HIPPA authorizations and strategy for requesting class member files; review draft requests	Discovery (Non-Deposition)
1/11/2023	Rachel Steyer	0.4	\$750	\$300	preparing and updating new batch of MTJ letter to OC for declarants' RFP	Communications With Opposing Counsel
1/11/2023	Rachel Steyer	0.9	\$750	\$675	reviewing and updating fields in reply declarant RFP spreadsheet	Discovery (Non-Deposition)
1/11/2023	Rachel Steyer	0.2	\$750	\$150	searching Relativity to confirm class member info to update RFP spreadsheet	Discovery (Non-Deposition)
1/11/2023	Rachel Steyer	0.2	\$750	\$150	preparing Miguel Mendoza authorization forms	Discovery (Non-Deposition)
1/11/2023	Rachel Steyer	0.5	\$750	\$375	received call back from declarant Miguel Mendoza, discussed case and sending authorization forms	Discovery (Non-Deposition)
1/11/2023	Rachel Steyer	0.8	\$750	\$600	miscellaneous research into HIPAA authorizations and length of time	Misc. Research
1/11/2023	Travis Close	1.8	\$850	\$1,530	Review and analyze history of privilege log meet and confer efforts, correspondence & court orders re same	Discovery (Non-Deposition)
1/11/2023	Travis Close	0.7	\$850	\$595	Review and analyze extent of data on task times/norms spreadsheets produced by Brookdale in March of 2021	Discovery (Non-Deposition)
1/11/2023	Travis Close	0.7	\$850	\$595	Analysis of deficiencies left in Brookdale's production of residency agreements	Discovery (Non-Deposition)
1/11/2023	Travis Close	0.6	\$850	\$510	Analyze deficiencies in Def's production regarding emergency evacuation planning documents, fire drills, etc	Discovery (Non-Deposition)
1/11/2023	Travis Close	1.6	\$850	\$1,360	Edits/revisions to sections of discovery status memo on emergency evacuation, accessible transportation, norms & algorithms	Discovery (Non-Deposition)
1/12/2023	Rachel Steyer	0.5	\$750	\$375	preparing new batch and corresponding folder of MTJ letter to OC requesting declarant resident files	Communications With Opposing Counsel

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/12/2023	Rachel Steyer	0.3	\$750	\$225	reviewing documents provided by declarant, organizing in new client docs folder	Discovery (Non-Deposition)
1/12/2023	Rachel Steyer	0.5	\$750	\$375	reviewing and updating RFP tracking spreadsheet	Discovery (Non-Deposition)
1/12/2023	Rachel Steyer	0.2	\$750	\$150	email to declarant Jeanne Thomas clarifying status of docs	Discovery (Non-Deposition)
1/12/2023	Rachel Steyer	0.2	\$750	\$150	received call back from Jenny Markgraff, confirmed that she would fax POA docs	Discovery (Non-Deposition)
1/12/2023	Rachel Steyer	0.6	\$750	\$450	ongoing research to determine whether HIPAA expirations can be modified	Misc. Research
1/12/2023	Travis Close	1.8	\$850	\$1,530	Revise section of discovery memo on depositions with updated info from 30(b)(6) witness transcripts	Case Organization, Planning and Strategy
1/12/2023	Travis Close	0.3	\$850	\$255	Email to MTJ re: issues for tomorrow's co-counsel meeting	Discovery (Non-Deposition)
1/12/2023	Travis Close	1.7	\$850	\$1,445	Analyze transcripts of court hearings from 2021-2022 for info on deficiencies in training materials asked for, but not yet produced, by Brookdale	Discovery (Non-Deposition)
1/12/2023	Travis Close	1.7	\$850	\$1,445	Review and analyze docs under custodian Christopher Odmark for info regarding software/systems for tracking access improvements.	Discovery (Non-Deposition)
1/12/2023	Travis Close	1.6	\$850	\$1,360	Revisions to plan of operations & access improvements sections of discovery status memo	Discovery (Non-Deposition)
1/13/2023	Guy Wallace	0.9	\$1,350	\$1,215	com's with JY; KS; MTJ re potential summary judgment motion re ADA violations and analysis of potential access barriers that may be raised therein	Motion for Summary Judgment / Adjudication
1/13/2023	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re identification of barriers for potential motion for PSJ	Other Motions
1/13/2023	Mark Johnson	0.8	\$1,150	\$920	zoom call w/ JY, GBW, KS re approach to MSJ and preparation of data / evidence for same	Motion for Summary Judgment / Adjudication
1/13/2023	Mark Johnson	0.7	\$1,150	\$805	call w/ GBW re MSJ approach, plan for call w/ co-counsel re same	Motion for Summary Judgment / Adjudication

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/13/2023	Rachel Steyer	0.2	\$750	\$150	preparing and updating next batch of MTJ letter to OC with declarant authorization forms	Communications With Opposing Counsel
1/13/2023	Rachel Steyer	0.4	\$750	\$300	reviewing and updating RFP tracking spreadsheet	Discovery (Non-Deposition)
1/13/2023	Rachel Steyer	0.2	\$750	\$150	preparing and combining updated Jenny Markgraff forms	Discovery (Non-Deposition)
1/13/2023	Travis Close	1.8	\$850	\$1,530	Analyze files/memos compiled by our doc reviewers and other attorneys for important topics not yet covered in discovery status memo	Discovery (Non-Deposition)
1/13/2023	Travis Close	0.7	\$850	\$595	Revisions to ownership/operations sections of discovery status memo	Discovery (Non-Deposition)
1/13/2023	Travis Close	1.7	\$850	\$1,445	Final revisions to first draft of discovery status memo; send to GBW for review	Discovery (Non-Deposition)
1/13/2023	Travis Close	0.6	\$850	\$510	Review and analyze JMP's spreadsheet organizing resident billing statement data for discovery status memo	Discovery (Non-Deposition)
1/13/2023	Travis Close	1.1	\$850	\$935	Analysis of contacts to Christopher Odmark (custodian) in emails produced for potential new custodians likely to have info on access improvements at facilities	Discovery (Non-Deposition)
1/13/2023	Travis Close	0.8	\$850	\$680	Legal research on how often ESI must be supplemented by producing party	Discovery (Non-Deposition)
1/17/2023	Mark Johnson	0.4	\$1,150	\$460	call w GBW re status of certain discovery pertaining to plaintiffs and strategy for discovery pending class cert order	Discovery (Non-Deposition)
1/17/2023	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW re Brookdale's initial disclosures and 26(f) conference and report	Discovery (Non-Deposition)
1/17/2023	Travis Close	1.3	\$850	\$1,105	Review and analyze DSS recent facility evaluation reports and complaint investigation reports issued for Clairemont, Oceanside, Valley View, Brookhurst, Sunwest, & Redwood City facilities	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/17/2023	Travis Close	1.5	\$850	\$1,275	Analyze recent history of meet & confer efforts regarding Def's supplemental privilege log & opportunities for follow-up	Discovery (Non-Deposition)
1/17/2023	Travis Close	2.2	\$850	\$1,870	Analyze prior communications from staffing experts for facilities missing floor plans & staffing data	Discovery (Non-Deposition)
1/17/2023	Travis Close	0.3	\$850	\$255	Email to LEC re: updated ED chart assignment for this week	Discovery (Non-Deposition)
1/17/2023	Travis Close	0.2	\$850	\$170	Email to MTJ, GBW re: updated draft of discovery status memo	Discovery (Non-Deposition)
1/17/2023	Travis Close	1.7	\$850	\$1,445	Further revisions to discovery status memo following edits/comments by GBW	Discovery (Non-Deposition)
1/18/2023	Guy Wallace	0.9	\$1,350	\$1,215	com's with MTJ; TCC; RLS re discovery tasks to be completed re named Plaintiffs and their facilities and staffing therein	Discovery (Non-Deposition)
1/18/2023	Mark Johnson	0.8	\$1,150	\$920	team call with GBW, TCC, RLS re discovery plan / strategy pending order on class cert motion decision	Discovery (Non-Deposition)
1/18/2023	Mark Johnson	0.9	\$1,150	\$1,035	draft email memo summarizing results of team mtg and identifying proposed areas of discovery, background and approach	Discovery (Non-Deposition)
1/18/2023	Mark Johnson	1.0	\$1,150	\$1,150	review TCC memo re status of discovery and recommendations	Discovery (Non-Deposition)
1/18/2023	Mark Johnson	0.4	\$1,150	\$460	review email and attachments from RLS re documents produced/not produced related to declarants and spreadsheets tracking same. further coms w/ RLS re same.	Discovery (Non-Deposition)
1/18/2023	Rachel Steyer	0.9	\$750	\$675	meeting with GBW, MTJ, TCC to review and discuss outstanding tasks and assignments	Case Organization, Planning and Strategy
1/18/2023	Rachel Steyer	0.4	\$750	\$300	received call back from Brookdale caller, wanted to review case details further and class member status	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/18/2023	Rachel Steyer	0.4	\$750	\$300	received call back from Brookdale caller, explained case and answered questions	Class Outreach and Contact
1/18/2023	Rachel Steyer	0.2	\$750	\$150	email to Brookdale caller providing contact info and links to agencies as requested	Class Outreach and Contact
1/18/2023	Rachel Steyer	0.2	\$750	\$150	reviewing notes in RFP spreadsheet	Discovery (Non-Deposition)
1/18/2023	Rachel Steyer	0.9	\$750	\$675	updating happy camper declarant chart, reviewing for further discovery action	Discovery (Non-Deposition)
1/18/2023	Rachel Steyer	0.2	\$750	\$150	reviewing email from MTJ summarizing and outlining various pending discovery assignments and tasks	Discovery (Non-Deposition)
1/18/2023	Rachel Steyer	0.4	\$750	\$300	looking for and analyzing earlier spreadsheet tracking defendants' declarant production	Discovery (Non-Deposition)
1/18/2023	Rachel Steyer	0.3	\$750	\$225	circulating declarant docs tracking spreadsheets to MTJ, GBW, TCC	Discovery (Non-Deposition)
1/18/2023	Rachel Steyer	0.3	\$750	\$225	response to GBW, MTJ, TCC concerning status of declarants at six named facilities, reviewing old notes and emails to verify whether any had been deposed	Discovery (Non-Deposition)
1/18/2023	Rachel Steyer	0.2	\$750	\$150	searching for Carlson ROG for discovery task	Discovery (Non-Deposition)
1/18/2023	Rachel Steyer	0.2	\$750	\$150	response to MTJ question about discovery productions corresponding to noticed declarants/happy campers	Discovery (Non-Deposition)
1/18/2023	Travis Close	1.7	\$850	\$1,445	Review and analyze Def's latest privilege log for info on redacted items & missing information	Case Organization, Planning and Strategy
1/18/2023	Travis Close	0.9	\$850	\$765	team meeting w/ RLS, GBW, MTJ re: additional discovery to follow up on before Judge's class cert decision	Case Organization, Planning and Strategy
1/18/2023	Travis Close	0.9	\$850	\$765	Analyze parties' Rule 26(f) report to determine whether supplemental disclosures are necessary & whether initial disclosures were sufficient	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/18/2023	Travis Close	2.3	\$850	\$1,955	Analyze prior discovery requests for readily achievable barrier removal to determine supplementation & follow up necessary	Discovery (Non-Deposition)
1/18/2023	Travis Close	0.8	\$850	\$680	Analyze list of current EDs at named plaintiff facilities & compare with previous list supplied by Def's	Discovery (Non-Deposition)
1/19/2023	Mark Johnson	0.1	\$1,150	\$115	follow up email exchange w/ D Marks re discovery and additional docs needed for staffing analysis.	Case Organization, Planning and Strategy
1/19/2023	Mark Johnson	0.3	\$1,150	\$345	coms w/ RLS and TCC re tracking ED history at 6 plaintiff facilities; review DSS records re same and share info w/ RLS	Discovery (Non-Deposition)
1/19/2023	Mark Johnson	2.8	\$1,150	\$3,220	begin drafting new set of document requests focused on six plaintiff facilities; review memos re discovery strategy and prior document requests re same; email to RLS, GBW, TCC re same	Discovery (Non-Deposition)
1/19/2023	Rachel Steyer	0.2	\$750	\$150	reviewing D's supplemental response to Carlson ROG for ED and HWD names/info	Discovery (Non-Deposition)
1/19/2023	Rachel Steyer	0.5	\$750	\$375	email to GBW, TCC, MTJ providing info about current EDs and HWDs	Discovery (Non-Deposition)
1/19/2023	Rachel Steyer	6.0	\$750	\$4,500	preparing and conducting additional analysis of happy camper declarants at six named plaintiff facilities	Discovery (Non-Deposition)
1/19/2023	Travis Close	0.9	\$850	\$765	Review and analyze past correspondence with Def's regarding identifying the facility administrators to determine follow up efforts necessary	Case Organization, Planning and Strategy
1/19/2023	Travis Close	0.4	\$850	\$340	Email to team re: proposal to follow up regarding existing discovery requests to obtain access improvement & alterations info	Case Organization, Planning and Strategy
1/19/2023	Travis Close	0.8	\$850	\$680	Review our previous analysis of the Brookdale Executive Director histories to determine necessary supplementation	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/19/2023	Travis Close	1.7	\$850	\$1,445	Review and analyze recent employee histories at the named plaintiff facilities based on DSS inspection records	Discovery (Non-Deposition)
1/19/2023	Travis Close	1.1	\$850	\$935	Analyze prior efforts by parties to meet and confer regarding production of records showing facility alterations	Discovery (Non-Deposition)
1/19/2023	Travis Close	0.7	\$850	\$595	Review and analyze interrogatories propounded & Def's responses for lists of access improvements made at the named plaintiff facilities	Discovery (Non-Deposition)
1/19/2023	Travis Close	1.6	\$850	\$1,360	Draft analysis of sufficiency of Def's responses to existing requests re: access improvements & alterations at named plaintiff facilities	Discovery (Non-Deposition)
1/20/2023	Mark Johnson	0.1	\$1,150	\$115	email exchange w/ AX re communication with clients	Case Organization, Planning and Strategy
1/20/2023	Mark Johnson	0.7	\$1,150	\$805	revise and add to draft Ninth set of document requests; email coms w/ GBW, TCC, RLS re same	Discovery (Non-Deposition)
1/20/2023	Rachel Steyer	6.1	\$750	\$4,575	continuing work on focused happy camper declarant spreadsheet and analysis	Discovery (Non-Deposition)
1/20/2023	Rachel Steyer	0.6	\$750	\$450	preparing excerpts of happy camper declarations from six named plaintiff facilities	Discovery (Non-Deposition)
1/20/2023	Travis Close	0.4	\$850	\$340	Email to RLS re: personnel report DSS state regulations	Case Organization, Planning and Strategy
1/20/2023	Travis Close	1.4	\$850	\$1,190	Legal research on regulations requiring identification & maintenance of records of residents with mobility disabilities	Case Organization, Planning and Strategy
1/20/2023	Travis Close	1.3	\$850	\$1,105	Review and analyze latest versions of budget spreadsheets/reports produced by Brookdale for purposes of readily achievable barrier removal	Case Organization, Planning and Strategy
1/20/2023	Travis Close	2.4	\$850	\$2,040	Revisions and additions to draft plaintiffs' requests for production, set 9	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/23/2023	Mark Johnson	0.5	\$1,150	\$575	begin incorporating D Marks proposed document requests related to staffing analysis into draft set of document requests.	Discovery (Non-Deposition)
1/23/2023	Rachel Steyer	0.3	\$750	\$225	received call from Brookdale caller, discussed case status	Class Outreach and Contact
1/23/2023	Rachel Steyer	1.3	\$750	\$975	ongoing review of specific happy camper declarants at named plaintiff facilities	Discovery (Non-Deposition)
1/23/2023	Rachel Steyer	3.6	\$750	\$2,700	preparing chart analyzing and compiling EDs and HWDs	Discovery (Non-Deposition)
1/23/2023	Rachel Steyer	1.7	\$750	\$1,275	reviewing/reading through Ninth Circuit ADA standing case circulated by GBW	Misc. Research
1/23/2023	Travis Close	0.7	\$850	\$595	Review and analyze ninth circuit's decision in Langer v. Kieser for applicability to standing of residents at Brookdale facilities	Discovery (Non-Deposition)
1/24/2023	Rachel Steyer	0.2	\$750	\$150	continuing and finalizing review of 21 happy camper declarants from named plaintiff facilities	Discovery (Non-Deposition)
1/24/2023	Rachel Steyer	4.4	\$750	\$3,300	continuing work on compiling updated list of EDs and HWDs and six named plaintiff facilities	Discovery (Non-Deposition)
1/24/2023	Travis Close	1.1	\$850	\$935	Review and analyze updated facility DSS evaluation reports and complaint investigation reports for Windsor, Kettleman Lane, Clairemont, Sunwest, Irvine, Central Whittier, and Diablo Lodge facilities	Case Organization, Planning and Strategy
1/24/2023	Travis Close	1.0	\$850	\$850	Create spreadsheet indexing versions of the master vehicle database including data on number of accessible spaces per vehicle	Case Organization, Planning and Strategy
1/24/2023	Travis Close	2.7	\$850	\$2,295	Create chart of Brookdale's facility interests (management, own, lease) over time using SEC's data and 10-k forms for updated ownership analysis	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/25/2023	Mark Johnson	1.0	\$1,150	\$1,150	revise draft of 9th set of document requests to include additional requests proposed by D. Marks w/ comments re same; email to GBW, RLS, TCC re same.	Discovery (Non-Deposition)
1/25/2023	Rachel Steyer	3.4	\$750	\$2,550	ongoing review and analysis of happy camper declarations from named plaintiff facilities	Discovery (Non-Deposition)
1/25/2023	Rachel Steyer	0.2	\$750	\$150	call with Karen Scarborough, agreed to follow up in a few weeks when she feels better	Discovery (Non-Deposition)
1/25/2023	Rachel Steyer	0.3	\$750	\$225	reviewing email forwarded by MTJ from co-counsel summarizing additional RFPs	Discovery (Non-Deposition)
1/25/2023	Rachel Steyer	0.4	\$750	\$300	reviewing revised MTJ draft RFPs set 9	Discovery (Non-Deposition)
1/25/2023	Rachel Steyer	0.4	\$750	\$300	locating and reviewing declarations of DDOs and EDs submitted by OC in opposition to class cert	Discovery (Non-Deposition)
1/25/2023	Travis Close	0.3	\$850	\$255	Email to RLS re: status of Brookdale's facilities in Hemet, CA	Case Organization, Planning and Strategy
1/25/2023	Travis Close	2.3	\$850	\$1,955	Draft letter to Brookdale re: responses to requests/ROGs regarding access improvements at the facilities	Case Organization, Planning and Strategy
1/25/2023	Travis Close	1.6	\$850	\$1,360	Review and analyze correspondence regarding docs showing access improvements at the named plaintiff facilities	Discovery (Non-Deposition)
1/25/2023	Travis Close	1.9	\$850	\$1,615	Review and analyze currency of Brookdale's discovery responses regarding renovation types, amounts, and descriptions	Discovery (Non-Deposition)
1/25/2023	Travis Close	0.2	\$850	\$170	Email to MTJ re: question about most recent ESI received by Brookdale	Discovery (Non-Deposition)
1/25/2023	Travis Close	0.5	\$850	\$425	Analyze content of Brookdale's most recent production of ESI	Discovery (Non-Deposition)
1/25/2023	Travis Close	0.2	\$850	\$170	Email to GBW re: latest 10-k published by Brookdale	Discovery (Non-Deposition)
1/26/2023	Rachel Steyer	0.2	\$750	\$150	sharing chart with GBW, MTJ, TCC	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/26/2023	Rachel Steyer	2.7	\$750	\$2,025	work on spreadsheet tracking and updating current HWDs and EDs at named plaintiff facilities	Discovery (Non-Deposition)
1/26/2023	Rachel Steyer	0.2	\$750	\$150	redoing/correcting HIPAA authorization forms	Discovery (Non-Deposition)
1/27/2023	Rachel Steyer	0.2	\$750	\$150	email to MTJ with question about discovery tasks and assignments	Discovery (Non-Deposition)
1/27/2023	Rachel Steyer	0.4	\$750	\$300	call with TCC to review and discuss discovery tasks	Discovery (Non-Deposition)
1/27/2023	Rachel Steyer	1.1	\$750	\$825	reviewing and downloading additional 10k corporate filings	Discovery (Non-Deposition)
1/27/2023	Rachel Steyer	2.3	\$750	\$1,725	reviewing status of Kelly Rubin production, NOD	Discovery (Non-Deposition)
1/30/2023	Guy Wallace	0.5	\$1,350	\$675	com's with GG; JY; MTJ re motion for partial summary judgment	Motion for Summary Judgment / Adjudication
1/30/2023	Rachel Steyer	0.9	\$750	\$675	completing review of Kelly Rubin docs, status of number of depositions	Discovery (Non-Deposition)
1/30/2023	Rachel Steyer	4.9	\$750	\$3,675	preparing chart tracking status of policy docs	Discovery (Non-Deposition)
1/31/2023	Rachel Steyer	0.9	\$750	\$675	received call from Brookdale caller, discussed status of case, discussed his specific situation	Class Outreach and Contact
1/31/2023	Rachel Steyer	2.1	\$750	\$1,575	completing Kelly Rubin review	Discovery (Non-Deposition)
1/31/2023	Travis Close	2.3	\$850	\$1,955	Review and analyze evidence on length of stay at Brookdale facilities for LOS analysis	Case Organization, Planning and Strategy
1/31/2023	Travis Close	2.1	\$850	\$1,785	Create LOS chart with updated information on average length of stay at Brookdale facilities based on all sources gathered	Case Organization, Planning and Strategy
1/31/2023	Travis Close	0.6	\$850	\$510	Review and analyze updated complaint investigation reports and facility evaluation reports issued for Riverwalk, Irvine, San Marocs, Redwood City, and San Jose facilities	Case Organization, Planning and Strategy
1/31/2023	Travis Close	0.5	\$850	\$425	Analyze chart of resident files processed by Brookdale to determine number of deficiencies remaining	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/31/2023	Travis Close	0.3	\$850	\$255	Email to GBW, RLS, GBW re: average length of stay at Brookdale facilities	Discovery (Non-Deposition)
1/31/2023	Travis Close	0.2	\$850	\$170	Email to GBW, RLS, MTJ re: DSS facility citations at Brookdale Irvine	Discovery (Non-Deposition)
2/1/2023	Rachel Steyer	2.3	\$750	\$1,725	Kelly Rubin document review and updating chart	Discovery (Non-Deposition)
2/1/2023	Travis Close	2.4	\$850	\$2,040	Review and analyze Defendants' updated privilege log for info on non-photo documents withheld from log	Case Organization, Planning and Strategy
2/1/2023	Travis Close	2.1	\$850	\$1,785	Create chart showing facilities inspected by Anderson v. team and corresponding privilege log entries	Case Organization, Planning and Strategy
2/1/2023	Travis Close	0.3	\$850	\$255	Email to JY (co-counsel) re: privilege log task before next week's meeting	Case Organization, Planning and Strategy
2/1/2023	Travis Close	0.2	\$850	\$170	Email to LEC re: copy of Def's latest priv log needed	Case Organization, Planning and Strategy
2/1/2023	Travis Close	0.8	\$850	\$680	Analyze depo testimony of Anderson for locations of facilities that he didn't visit; or that only his surveyor team visited	Discovery (Non-Deposition)
2/2/2023	Guy Wallace	0.5	\$1,350	\$675	analysis of current potential for further settlement discussions; com's with MTJ re same	Settlement
2/2/2023	Travis Close	1.7	\$850	\$1,445	Research recent decisions by Judge Gilliam on motions for class certification	Case Organization, Planning and Strategy
2/2/2023	Travis Close	0.2	\$850	\$170	Email to MTJ re: question about irregular entries in Def's privilege log	Case Organization, Planning and Strategy
2/2/2023	Travis Close	0.2	\$850	\$170	Email to RLS re: question about privilege log photos of resident units	Case Organization, Planning and Strategy
2/2/2023	Travis Close	0.8	\$850	\$680	Analyze judge Gilliam's recent decisionmaking record using Lexis Analytics	Discovery (Non-Deposition)
2/2/2023	Travis Close	2.3	\$850	\$1,955	Create chart analyzing recent decisions by Judge Gilliam on class action disputes	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/3/2023	Guy Wallace	0.8	\$1,350	\$1,080	com's with MTJ re class certification; further staffing analyses and discovery re facilities pertaining to named Plaintiffs	Discovery (Non-Deposition)
2/3/2023	Travis Close	1.8	\$850	\$1,530	Review and analyze Relativity results for Mary Sue Patchett to determine suitability for future deposition	Case Organization, Planning and Strategy
2/3/2023	Travis Close	1.9	\$850	\$1,615	Analysis of emails from Kelly Grounds regarding resident complaints about staffing services	Case Organization, Planning and Strategy
2/3/2023	Travis Close	1.5	\$850	\$1,275	Review and analyze accounting, revenue, billing detail records for additional custodians for ESI & potential depo witnesses	Case Organization, Planning and Strategy
2/3/2023	Travis Close	0.4	\$850	\$340	Research current head of Brookdale's Asset Management division	Case Organization, Planning and Strategy
2/3/2023	Travis Close	0.4	\$850	\$340	Research current employees of Brookdale's service alignment team	Discovery (Non-Deposition)
2/6/2023	Mark Johnson	0.4	\$1,150	\$460	coms w/ GBW, COC re draft proposed RFPs; revise same and send to COC	Discovery (Non-Deposition)
2/6/2023	Rachel Steyer	5.8	\$750	\$4,350	ongoing review of Kelly Rubin documents, updating chart	Discovery (Non-Deposition)
2/6/2023	Rachel Steyer	0.3	\$750	\$225	reviewing and providing minor edits to draft Ps RFP as circulated by MTJ	Discovery (Non-Deposition)
2/7/2023	Rachel Steyer	7.4	\$750	\$5,550	ongoing review of Kelly Rubin documents, updating chart	Discovery (Non-Deposition)
2/8/2023	Rachel Steyer	0.3	\$750	\$225	searching emails and sharepoint documents to review and gather status of Kelly Rubin depo, prior communications	Discovery (Non-Deposition)
2/8/2023	Rachel Steyer	0.3	\$750	\$225	email to MTJ, GBW, TCC replying to discovery task list concerning Kelly Rubin	Discovery (Non-Deposition)
2/8/2023	Rachel Steyer	6.3	\$750	\$4,725	reviewing production and updating chart tracking status of various key policy documents	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/8/2023	Travis Close	2.3	\$850	\$1,955	Continue drafting letter to Def's counsel re: deficiencies in access improvement responses	Case Organization, Planning and Strategy
2/8/2023	Travis Close	1.4	\$850	\$1,190	Review and analyze previous correspondence re: Def's responses to access improvements discovery	Case Organization, Planning and Strategy
2/8/2023	Travis Close	2.2	\$850	\$1,870	Analyze whether records of software showing access improvements at six facilities have been produced under certain custodians	Case Organization, Planning and Strategy
2/8/2023	Travis Close	0.3	\$850	\$255	Email to RLS re: edits to correspondence letter with Defs	Case Organization, Planning and Strategy
2/8/2023	Travis Close	0.2	\$850	\$170	Email to RLS re: clarification about number of depositions left	Case Organization, Planning and Strategy
2/9/2023	Mark Johnson	0.5	\$1,150	\$575	revise proposed document request to limit same and make additional revisions; email to COC re same and explanation and copy for review.	Discovery (Non-Deposition)
2/9/2023	Rachel Steyer	5.7	\$750	\$4,275	ongoing review and search of key policy documents, updating chart tracking said key documents	Discovery (Non-Deposition)
2/9/2023	Travis Close	1.3	\$850	\$1,105	Review and analyze updated 10-k reports recently issued by Brookdale for info on financial resources available to individual facilities	Case Organization, Planning and Strategy
2/9/2023	Travis Close	1.5	\$850	\$1,275	legal research on readily achievable barrier removal examples at existing facilities	Case Organization, Planning and Strategy
2/9/2023	Travis Close	1.3	\$850	\$1,105	Research owner v. operator liability for determining readily achievable barrier removal	Case Organization, Planning and Strategy
2/9/2023	Travis Close	1.7	\$850	\$1,445	Research case law where existence of parent company was found to weigh in favor of readily achievable barrier removal	Case Organization, Planning and Strategy
2/9/2023	Travis Close	1.7	\$850	\$1,445	Legal research on readily achievable barrier removal examples for common bathrooms at existing facilities	Discovery (Non-Deposition)
2/10/2023	Rachel Steyer	6.9	\$750	\$5,175	reviewing production and updating spreadsheet tracking training materials	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/10/2023	Travis Close	0.2	\$850	\$170	Email to LEC re: plan to discuss assignments for next week	Case Organization, Planning and Strategy
2/10/2023	Travis Close	0.6	\$850	\$510	Legal research on tax benefits available to businesses who remove access barriers	Case Organization, Planning and Strategy
2/10/2023	Travis Close	1.8	\$850	\$1,530	Research on geographic separateness, and the administrative or fiscal relationship of the Brookdale facilities v. corporate entity	Case Organization, Planning and Strategy
2/10/2023	Travis Close	1.7	\$850	\$1,445	Legal research on meaning of "administrative and fiscal relationship" between parent and subsidiary in determining readily achievable barrier removal	Case Organization, Planning and Strategy
2/10/2023	Travis Close	2.1	\$850	\$1,785	Research examples of building alterations found not to be readily achievable in ninth circuit	Case Organization, Planning and Strategy
2/10/2023	Travis Close	0.7	\$850	\$595	Create list of software systems in use by Brookdale corporate that establishes an "administrative relationship" under ADA	Case Organization, Planning and Strategy
2/13/2023	Rachel Steyer	0.3	\$750	\$225	re-reviewing portions of TCC discovery memo	Discovery (Non-Deposition)
2/13/2023	Rachel Steyer	0.2	\$750	\$150	reviewing spreadsheet/doc put together by EPO tracking training docs	Discovery (Non-Deposition)
2/13/2023	Rachel Steyer	0.4	\$750	\$300	email to GBW, MTJ, TCC providing synopsis of class lists	Discovery (Non-Deposition)
2/13/2023	Rachel Steyer	1.1	\$750	\$825	reviewing and updating key documents spreadsheet	Discovery (Non-Deposition)
2/13/2023	Travis Close	0.4	\$850	\$340	Review and analyze memo by JMP on categories of documents produced in Brookdale's latest production	Case Organization, Planning and Strategy
2/13/2023	Travis Close	0.3	\$850	\$255	Review the analysis by RLS on Brookdale's production of resident contact information	Case Organization, Planning and Strategy
2/13/2023	Travis Close	2.2	\$850	\$1,870	Review and analyze results for access-related complaints due to inoperable elevators at Brookdale facilities	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/14/2023	Rachel Steyer	6.0	\$750	\$4,500	miscellaneous discovery research in anticipation of need for authority to support discovery supplementation for forthcoming RFPs (whether proceedings are bifurcated and requirement of Ds to supplement)	Misc. Research
2/14/2023	Travis Close	0.5	\$850	\$425	Review and analyze recent complaint investigation reports and facility evaluation reports issued for Paulin Creek, Clairemont, Sylvan Ranch, and Brookhurst facilities	Case Organization, Planning and Strategy
2/14/2023	Travis Close	0.9	\$850	\$765	Edits to draft correspondence with Defendants re: deficient responses to RFPs/ROGs discovery regarding alterations at facilities	Case Organization, Planning and Strategy
2/15/2023	Travis Close	1.6	\$850	\$1,360	Edits to master discovery spreadsheet regarding status of Defendants' responses to RFP #7	Case Organization, Planning and Strategy
2/15/2023	Travis Close	1.5	\$850	\$1,275	Analyze Brookdale's opposition to class cert filings for info re: completion of production of local policies at facilities	Case Organization, Planning and Strategy
2/15/2023	Travis Close	0.3	\$850	\$255	Email to LEC re: duplicate copies of discovery spreadsheets	Case Organization, Planning and Strategy
2/15/2023	Travis Close	1.4	\$850	\$1,190	Analyze history of Def's production of job descriptions, joint letter briefs, and status to response to latest request re same	Case Organization, Planning and Strategy
2/16/2023	Rachel Steyer	0.3	\$750	\$225	following up with declarant to provide case status update	Class Certification
2/16/2023	Travis Close	1.3	\$850	\$1,105	Edits to master discovery spreadsheet recording status of Brookdale's responses to our requests (RFP 9)	Case Organization, Planning and Strategy
2/16/2023	Travis Close	1.3	\$850	\$1,105	Updates to master discovery spreadsheet with info on status of production of vehicle inventory spreadsheets/databases	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/16/2023	Travis Close	1.5	\$850	\$1,275	Edits to master discovery spreadsheet regarding BKD's communications with state agency staff re: plans of correction, appeals, etc.	Case Organization, Planning and Strategy
2/16/2023	Travis Close	0.7	\$850	\$595	Review and analyze prior email communication with Defs re: production of corrective actions	Case Organization, Planning and Strategy
2/16/2023	Travis Close	0.7	\$850	\$595	Review and analyze parties' communications regarding Def's answers to request for plans of correction	Case Organization, Planning and Strategy
2/16/2023	Travis Close	1.1	\$850	\$935	Analyze history of production of resident files & update master discovery spreadsheet with relevant status info	Case Organization, Planning and Strategy
2/16/2023	Travis Close	0.9	\$850	\$765	Review and analyze parties' correspondence re: Def's responses to fourth set of interrogatories to determine status of production of info re: alterations at facilities	Discovery (Non-Deposition)
2/17/2023	Guy Wallace	0.7	\$1,350	\$945	zoom with GCG; JY; AX; KS; BU; MTJ; TCC; RLS re discovery; draft PSJ	Appeal
2/17/2023	Mark Johnson	0.7	\$1,150	\$805	team zoom call re discovery pending class cert order, planning for partial summary judgment motion,	Case Organization, Planning and Strategy
2/17/2023	Mark Johnson	0.2	\$1,150	\$230	review and draft responses to emails from TCC, J Yellin re draft document requests.	Discovery (Non-Deposition)
2/17/2023	Rachel Steyer	0.3	\$750	\$225	reviewing earlier notes/searching for discovery order concerning d's production of full class list	Discovery (Non-Deposition)
2/17/2023	Rachel Steyer	0.3	\$750	\$225	editing TCC draft RFPs and correspondence to OC	Discovery (Non-Deposition)
2/17/2023	Rachel Steyer	5.3	\$750	\$3,975	reviewing declarations and updating chart to track access barriers	Motion for Summary Judgment / Adjudication
2/17/2023	Travis Close	0.7	\$850	\$595	Analyze policy manual spreadsheet created by RLS for consistency with prior findings on missing versions of manuals	Case Organization, Planning and Strategy
2/17/2023	Travis Close	0.7	\$850	\$595	team meeting with co-counsel re: strategy for MSJ & new discovery to pursue before court's decision	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/17/2023	Travis Close	1.2	\$850	\$1,020	Email to team re: proposed additions to draft RFP, Set 9	Case Organization, Planning and Strategy
2/17/2023	Travis Close	0.4	\$850	\$340	Email to team re: follow-up regarding Draft RFPs Set 9 & correspondence	Case Organization, Planning and Strategy
2/21/2023	Guy Wallace	0.4	\$1,350	\$540	legal research and analysis re recent decision from Judge Gilliam re Smith v. Apple and injury-in-fact; com's with CJH; BU; MTJ re same	Class Certification
2/21/2023	Travis Close	0.7	\$850	\$595	Review and analyze judge gilliam's standing analysis & decision in Smith v. Apple for applicability to our class cert motion	Case Organization, Planning and Strategy
2/21/2023	Travis Close	0.8	\$850	\$680	Review and analyze recent facility evaluation and complaint investigation reports issued for Monrovia, Brookhurst, Roseville, Auburn, Clairemont, and Chanate facilities	Case Organization, Planning and Strategy
2/21/2023	Travis Close	1.8	\$850	\$1,530	Analyze recent standing analyses issued in northern district of California since McGee v. S-L Snacks for cases where consumers paid too much for product/service	Case Organization, Planning and Strategy
2/22/2023	Travis Close	0.5	\$850	\$425	Review and analyze edits by co-counsel to draft Set 9 RFPs	Case Organization, Planning and Strategy
2/22/2023	Travis Close	1.7	\$850	\$1,445	Analysis of latest version of Brookdale's policy and procedure manuals produced in litigation, 2021-2022	Case Organization, Planning and Strategy
2/22/2023	Travis Close	2.1	\$850	\$1,785	Legal research re: definition of class period covered in discovery requests and whether specification of claim is necessary	Case Organization, Planning and Strategy
2/23/2023	Mark Johnson	0.3	\$1,150	\$345	Call with Rita Stiner re case status, developments with fees, Stacy	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/23/2023	Mark Johnson	0.8	\$1,150	\$920	review and edit latest draft of document requests, set 9; draft email to co-counsel re same; review meet and confer lettter from TCC re access-related requests and email re same.	Discovery (Non-Deposition)
2/23/2023	Rachel Steyer	0.7	\$750	\$525	reviewing Smith v. Apple case referenced by GBW	Misc. Research
2/23/2023	Rachel Steyer	5.2	\$750	\$3,900	ongoing review of declarations for ADA barriers, updating spreadsheet/chart	Motion for Summary Judgment / Adjudication
2/24/2023	Guy Wallace	0.9	\$1,350	\$1,215	com's with RLS re further class outreach and issues re access barriers and transportation policies; analysis of discovery plan re same	Discovery (Non-Deposition)
2/24/2023	Guy Wallace	0.8	\$1,350	\$1,080	legal research and analysis re Langer decision from Ninth Circuit and district court cases re same and issue of scope of standing to challenge barriers	Misc. Research
2/24/2023	Rachel Steyer	0.5	\$750	\$375	call with GBW to review and discuss outstanding tasks and assignments	Class Outreach and Contact
2/24/2023	Rachel Steyer	2.3	\$750	\$1,725	drafting follow up outreach script for declarants	Class Outreach and Contact
2/24/2023	Rachel Steyer	0.2	\$750	\$150	email to GBW, TCC, MTJ and co-counsel sharing analyzing categories of barriers in declarations	Motion for Summary Judgment / Adjudication
2/24/2023	Travis Close	0.4	\$850	\$340	Review and analyze chart tracking putative class member declarations by RLS	Case Organization, Planning and Strategy
2/27/2023	Guy Wallace	0.6	\$1,350	\$810	review and analysis of draft RFPs, set 9; com's with MTJ; RLS re same	Discovery (Non-Deposition)
2/27/2023	Mark Johnson	1.0	\$1,150	\$1,150	revise and finalize ninth set of document requests; com w/ J Yellin and LEC re same	Discovery (Non-Deposition)
2/27/2023	Mark Johnson	0.3	\$1,150	\$345	coms w/ GBW, RLS, TCC re meet and confer letter on three subjects.	Discovery (Non-Deposition)
2/27/2023	Rachel Steyer	0.2	\$750	\$150	spoke with declarant to provide update about case	Class Outreach and Contact
2/27/2023	Rachel Steyer	0.3	\$750	\$225	call with declarant to provide case status update	Class Outreach and Contact
2/27/2023	Rachel Steyer	0.2	\$750	\$150	spoke with declarant, provided case update	Class Outreach and Contact
2/27/2023	Rachel Steyer	0.2	\$750	\$150	call with declarant, provided case status update	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/27/2023	Rachel Steyer	0.3	\$750	\$225	call with declarant, provided case update	Class Outreach and Contact
2/27/2023	Rachel Steyer	0.2	\$750	\$150	call with declarant, provided case status update	Class Outreach and Contact
2/27/2023	Rachel Steyer	0.2	\$750	\$150	spoke with declarant, provided case status update	Class Outreach and Contact
2/27/2023	Rachel Steyer	1.2	\$750	\$900	reviewing and updating declarant contact info spreadsheet	Class Outreach and Contact
2/27/2023	Rachel Steyer	0.2	\$750	\$150	response to MTJ, GBW, TCC, and cocounsel concerning draft language in meet and confer letter	Discovery (Non-Deposition)
2/27/2023	Rachel Steyer	0.6	\$750	\$450	adding draft language to meet and confer letter	Discovery (Non-Deposition)
2/27/2023	Rachel Steyer	0.2	\$750	\$150	revising draft language in meet and confer letter	Discovery (Non-Deposition)
2/27/2023	Travis Close	0.3	\$850	\$255	Review and analyze recent edits by MTJ to draft RFPs, Set 9	Case Organization, Planning and Strategy
2/27/2023	Travis Close	1.7	\$850	\$1,445	Edits to draft correspondence letter regarding deficiencies in production of access discovery at the six facilities	Case Organization, Planning and Strategy
2/27/2023	Travis Close	0.8	\$850	\$680	Review and analyze most recently tagged docs for Brookdale Brookhurst facility to clarify dates (re: access discovery letter)	Case Organization, Planning and Strategy
2/27/2023	Travis Close	0.9	\$850	\$765	Review and analyze most recently tagged docs for Brookdale Hemet, Scotts Valley facilities to clarify dates (re: access discovery letter)	Case Organization, Planning and Strategy
2/27/2023	Travis Close	0.3	\$850	\$255	Email to RLS explaining latest edits to meet & confer letter on access improvemnets	Case Organization, Planning and Strategy
2/28/2023	Mark Johnson	3.5	\$1,150	\$4,025	Revise and add to draft meet and confer ltr re access requests, class contact list and resident files, docs responsive to Anderson subpoena; review privilege log and document production metadata from Anderson production and prior discovery briefing and orders re same for content of letter	Discovery (Non-Deposition)
2/28/2023	Rachel Steyer	0.2	\$750	\$150	call with declarant, provided case status update	Class Certification
2/28/2023	Rachel Steyer	0.2	\$750	\$150	spoke with declarant and provided case status updaae	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/28/2023	Rachel Steyer	0.2	\$750	\$150	call with declarant, provided case status update	Class Outreach and Contact
2/28/2023	Rachel Steyer	0.2	\$750	\$150	received call back from declarant, provided case status update	Class Outreach and Contact
2/28/2023	Rachel Steyer	0.3	\$750	\$225	call with declarant, provided case status update	Class Outreach and Contact
2/28/2023	Rachel Steyer	0.2	\$750	\$150	follow up call with declarant, provided case status update	Class Outreach and Contact
2/28/2023	Rachel Steyer	0.2	\$750	\$150	call with declarant, provided case status update	Class Outreach and Contact
2/28/2023	Rachel Steyer	0.2	\$750	\$150	spoke with declarant to provide case status update	Class Outreach and Contact
2/28/2023	Rachel Steyer	0.2	\$750	\$150	spoke with declarant, provided case status update	Class Outreach and Contact
2/28/2023	Rachel Steyer	0.2	\$750	\$150	spoke with declarant and provided case status update	Class Outreach and Contact
2/28/2023	Rachel Steyer	0.3	\$750	\$225	spoke with declarant and provided case status update	Class Outreach and Contact
2/28/2023	Rachel Steyer	0.3	\$750	\$225	received call back from declarant, provided case status update	Class Outreach and Contact
2/28/2023	Rachel Steyer	0.3	\$750	\$225	spoke with declarant and provided case status update, scheduled follow up call	Class Outreach and Contact
2/28/2023	Rachel Steyer	0.2	\$750	\$150	follow up call with declarant, provided case status update	Class Outreach and Contact
2/28/2023	Rachel Steyer	0.2	\$750	\$150	reviewing MTJ draft meet and confer letter	Discovery (Non-Deposition)
2/28/2023	Travis Close	0.3	\$850	\$255	Review and analyze final draft of RFP, Set 9 served on Defendants, for accuracy	Case Organization, Planning and Strategy
2/28/2023	Travis Close	0.6	\$850	\$510	Review and analyze recent DSS facility evaluation and complaint investigation reports issued for Corona, Roseville, Irvine, Valley View, and Riverwalk facilities	Case Organization, Planning and Strategy
3/1/2023	Mark Johnson	0.8	\$1,150	\$920	review and incorporate proposed edits to meet and confer letter, coms w/ COC re edits, finalize and send to OC	Discovery (Non-Deposition)
3/1/2023	Rachel Steyer	0.2	\$750	\$150	spoke with declarant, provided case status update	Class Outreach and Contact
3/1/2023	Rachel Steyer	0.2	\$750	\$150	spoke with declarant and provided case status update	Class Outreach and Contact
3/1/2023	Rachel Steyer	0.3	\$750	\$225	spoke with declarant and provided case status update	Class Outreach and Contact
3/1/2023	Rachel Steyer	0.3	\$750	\$225	spoke with declarant and provided case status update	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/1/2023	Rachel Steyer	0.2	\$750	\$150	reviewing and updating declarant contact info spreadsheet	Class Outreach and Contact
3/1/2023	Rachel Steyer	0.5	\$750	\$375	received call back from declarant, provided case status update and answered questions	Class Outreach and Contact
3/1/2023	Rachel Steyer	0.2	\$750	\$150	spoke with declarant, provided case status update	Class Outreach and Contact
3/1/2023	Rachel Steyer	0.2	\$750	\$150	spoke with declarant, provided case status update and scheduled follow up call	Class Outreach and Contact
3/1/2023	Rachel Steyer	0.2	\$750	\$150	spoke with declarant, provided case status update	Class Outreach and Contact
3/1/2023	Rachel Steyer	0.4	\$750	\$300	reviewing records for declarant to determine class member status	Discovery (Non-Deposition)
3/1/2023	Rachel Steyer	0.4	\$750	\$300	drafting correspondence to OC concerning production of declarant resident files	Discovery (Non-Deposition)
3/1/2023	Rachel Steyer	0.2	\$750	\$150	revising letter to OC concerning production of resident files	Discovery (Non-Deposition)
3/1/2023	Travis Close	1.1	\$850	\$935	Further edits to joint letter brief re: Anderson discovery, access improvements, and class list	Case Organization, Planning and Strategy
3/1/2023	Travis Close	0.3	\$850	\$255	Email to team re: inclusion of community transportation policies in the latest joint letter	Case Organization, Planning and Strategy
3/1/2023	Travis Close	0.2	\$850	\$170	Review and analyze final, served version of discovery letter to defendants	Case Organization, Planning and Strategy
3/2/2023	Mark Johnson	0.6	\$1,150	\$690	review and revise RLS draft follow up letter to OC re declarant files and email exchange re same and FTP site for attachments	Discovery (Non-Deposition)
3/2/2023	Rachel Steyer	0.3	\$750	\$225	updating class member declarant contact info spreadsheet	Class Outreach and Contact
3/2/2023	Rachel Steyer	1.5	\$750	\$1,125	follow up call with declarant, conducted follow up intake	Class Outreach and Contact
3/2/2023	Rachel Steyer	0.4	\$750	\$300	spoke with declarant and provided case status update	Class Outreach and Contact
3/2/2023	Rachel Steyer	0.3	\$750	\$225	received call back from declarant, provided case status update	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/2/2023	Rachel Steyer	0.4	\$750	\$300	received call back from declarant, provided case status update	Class Outreach and Contact
3/2/2023	Rachel Steyer	0.2	\$750	\$150	spoke with declarant, provided case status update	Class Outreach and Contact
3/2/2023	Rachel Steyer	0.5	\$750	\$375	spoke with declarant and provided case status update	Class Outreach and Contact
3/2/2023	Rachel Steyer	1.0	\$750	\$750	reviewing production for documents corresponding to Brookdale ED	Discovery (Non-Deposition)
3/2/2023	Rachel Steyer	1.0	\$750	\$750	reviewing earlier correspondence and representations by OC concerning completeness of production of resident files	Discovery (Non-Deposition)
3/2/2023	Travis Close	2.3	\$850	\$1,955	Analyze residency agreements produced to-date for declarants in support of class cert & reply	Case Organization, Planning and Strategy
3/2/2023	Travis Close	0.8	\$850	\$680	Analyze arbitration language in residency agreements produced to-date for declarants in support of class cert & reply	Case Organization, Planning and Strategy
3/2/2023	Travis Close	0.3	\$850	\$255	Edits/revisions to draft letter to opposing counsel regarding resident files	Case Organization, Planning and Strategy
3/2/2023	Travis Close	0.9	\$850	\$765	Analyze recent case updates in related case Bright v. Brookdale and discovery motions brought for service alignment software & time studies	Discovery (Non-Deposition)
3/3/2023	Rachel Steyer	0.2	\$750	\$150	spoke with declarant and provided case status update	Class Outreach and Contact
3/3/2023	Rachel Steyer	0.2	\$750	\$150	spoke with declarant and provided case status update	Class Outreach and Contact
3/3/2023	Rachel Steyer	0.3	\$750	\$225	spoke with declarant and provided case status update	Class Outreach and Contact
3/3/2023	Rachel Steyer	0.2	\$750	\$150	spoke with declarant and provided case status update	Class Outreach and Contact
3/3/2023	Rachel Steyer	0.2	\$750	\$150	spoke with declarant and provided case status update	Class Outreach and Contact
3/3/2023	Travis Close	1.6	\$850	\$1,360	Legal research on readily achievable barrier removal	Case Organization, Planning and Strategy
3/3/2023	Travis Close	1.3	\$850	\$1,105	Begin drafting follow-up letter to defendants re: accessibility improvements performed at the named plaintiff facilities	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/3/2023	Travis Close	1.8	\$850	\$1,530	Review and analyze resident complaints produced from named plaintiff (Fountaingrove, Scotts Valley, Hemet) facilities re: barriers	Case Organization, Planning and Strategy
3/6/2023	Mark Johnson	0.2	\$1,150	\$230	exchanges w/ OC re scheduling meet and confer re 3 discovery categories, invites for same	Discovery (Non-Deposition)
3/6/2023	Mark Johnson	0.3	\$1,150	\$345	review 3/1/23 meet and confer letter; draft email to RLS and TCC re preparing bullet points / arguments for issues raised by letter	Discovery (Non-Deposition)
3/6/2023	Rachel Steyer	0.5	\$750	\$375	reviewing and updating class member declarant contact info spreadsheet	Class Outreach and Contact
3/6/2023	Rachel Steyer	1.1	\$750	\$825	conducted follow up intake call with current resident declarant	Class Outreach and Contact
3/6/2023	Rachel Steyer	0.2	\$750	\$150	received call back from declarant, discussed case status update	Class Outreach and Contact
3/6/2023	Rachel Steyer	0.3	\$750	\$225	spoke with declarant, provided case status update and confirmed contact information	Class Outreach and Contact
3/6/2023	Rachel Steyer	0.3	\$750	\$225	reviewing relativity production for documents corresponding to Brookdale resident	Discovery (Non-Deposition)
3/6/2023	Rachel Steyer	0.2	\$750	\$150	reviewing discovery production to try to identify contact info for descendant of Brookdale declarant	Discovery (Non-Deposition)
3/6/2023	Travis Close	1.8	\$850	\$1,530	Research prior versions of maintenance manual, referenced by Bowman depo, found at the named plaintiff facilities	Case Organization, Planning and Strategy
3/7/2023	Mark Johnson	2.4	\$1,150	\$2,760	review D privilege log re Anderson docs and prior orders and joint discovery letters; draft outline of argument for meet and confer scheduled for 3/14 on that topic; integrate with outlines from TCC, RLS on other topics, draft email to RLS and TCC re same and re strategy for meet and confer	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/7/2023	Rachel Steyer	0.2	\$750	\$150	reviewing and updating notes in declarant contact info spreadsheet	Class Outreach and Contact
3/7/2023	Rachel Steyer	0.2	\$750	\$150	received call back from declarant, provided case status update	Class Outreach and Contact
3/7/2023	Rachel Steyer	1.1	\$750	\$825	conducted follow up intake with current declarant resident	Class Outreach and Contact
3/7/2023	Rachel Steyer	0.3	\$750	\$225	follow up call with declarant to provide case status update	Class Outreach and Contact
3/7/2023	Rachel Steyer	0.2	\$750	\$150	completing final review of letter to opposing counsel concerning resident files	Communications With Opposing Counsel
3/7/2023	Rachel Steyer	0.9	\$750	\$675	preparing notes for MTJ in anticipation of meet and confer	Discovery (Non-Deposition)
3/7/2023	Rachel Steyer	0.2	\$750	\$150	reviewing TCC notes in preparation for meet and confer	Discovery (Non-Deposition)
3/7/2023	Rachel Steyer	0.3	\$750	\$225	reviewing production for any documents corresponding to Brookdale Tracy ED	Discovery (Non-Deposition)
3/7/2023	Rachel Steyer	0.3	\$750	\$225	reviewing financial documents in production	Discovery (Non-Deposition)
3/7/2023	Travis Close	0.4	\$850	\$340	Review and analyze letter to opposing counsel by RLS re: resident files	Case Organization, Planning and Strategy
3/7/2023	Travis Close	0.6	\$850	\$510	Review and analyze status of named plaintiffs for next week's M/C call with defendants	Case Organization, Planning and Strategy
3/7/2023	Travis Close	0.7	\$850	\$595	Review and analyze prior discovery requests re: policies and procedures for performing maintenance and access work	Case Organization, Planning and Strategy
3/7/2023	Travis Close	0.4	\$850	\$340	Email to team re: strategy for obtaining access work discovery	Case Organization, Planning and Strategy
3/7/2023	Travis Close	1.9	\$850	\$1,615	Draft memo analyzing access work discovery requested in prior interrogatories vs. new RFPs	Case Organization, Planning and Strategy
3/7/2023	Travis Close	1.2	\$850	\$1,020	Analyze prior discovery produced re: access work performed in response to resident complaint	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/8/2023	Mark Johnson	0.3	\$1,150	\$345	draft email to TCC re tracking DSS information from reports and creation of mechanism for same	Case Organization, Planning and Strategy
3/8/2023	Mark Johnson	0.7	\$1,150	\$805	call w/ client S Stiner re developments and problems at facility with service and potential retaliation, strategy for addressing same (.5); call w/ GBW re same. (.2)	Case Organization, Planning and Strategy
3/8/2023	Rachel Steyer	0.8	\$750	\$600	conducted follow up intake call with declarant	Class Outreach and Contact
3/8/2023	Rachel Steyer	0.5	\$750	\$375	follow up call with declarant, provided case status update	Class Outreach and Contact
3/8/2023	Rachel Steyer	0.6	\$750	\$450	call with Brookdale caller, explained case and answered questions	Class Outreach and Contact
3/8/2023	Rachel Steyer	0.2	\$750	\$150	reviewing and updating declarant contact info spreadsheet	Class Outreach and Contact
3/8/2023	Rachel Steyer	0.7	\$750	\$525	reviewing production for documents for names of HWD and ED	Discovery (Non-Deposition)
3/8/2023	Rachel Steyer	0.5	\$750	\$375	searching production for documents corresponding to other ED (as provided by current Brookdale declarant resident)	Discovery (Non-Deposition)
3/8/2023	Rachel Steyer	0.3	\$750	\$225	reviewing notes for Brookdale Cortona Park facility	Discovery (Non-Deposition)
3/9/2023	Guy Wallace	0.5	\$1,350	\$675	review and analysis of D's filings re pending motion to stay discovery; com's with MTJ re same	Other Motions
3/9/2023	Rachel Steyer	1.3	\$750	\$975	conducted follow up intake call with declarant	Class Outreach and Contact
3/9/2023	Rachel Steyer	0.4	\$750	\$300	received call from current BKD resident, discussed case, scheduled follow up call	Class Outreach and Contact
3/9/2023	Rachel Steyer	0.3	\$750	\$225	follow up call with declarant, provided case status update	Class Outreach and Contact
3/9/2023	Rachel Steyer	0.2	\$750	\$150	email to GBW, MTJ, TCC with question about class outreach efforts	Class Outreach and Contact
3/9/2023	Rachel Steyer	0.3	\$750	\$225	follow up call with Brookdale caller, answered questions	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/9/2023	Travis Close	0.3	\$850	\$255	Review and analyze Def's motion pursuant to LR 7-11 to continue hearing & court's recent decision denying it	Case Organization, Planning and Strategy
3/9/2023	Travis Close	1.2	\$850	\$1,020	Review and analyze history of project communications/actions/status with respect to recording employee information based on DSS reports	Case Organization, Planning and Strategy
3/9/2023	Travis Close	1.4	\$850	\$1,190	Draft analysis of employee records project, based on online DSS reports, including project status, challenges, and next recommended steps	Case Organization, Planning and Strategy
3/9/2023	Travis Close	0.5	\$850	\$425	Review and analyze organizational charts to determine regional clinical services positions	Case Organization, Planning and Strategy
3/10/2023	Rachel Steyer	0.8	\$750	\$600	reviewing notes and updating declarant contact info spreadsheet	Class Outreach and Contact
3/10/2023	Rachel Steyer	0.3	\$750	\$225	call with declarant to provide case status update and confirm contact information	Class Outreach and Contact
3/10/2023	Travis Close	0.4	\$850	\$340	Review and analyze memo by GBW analyzing recent decisions on requirements for consuming standing under CLRA	Case Organization, Planning and Strategy
3/10/2023	Travis Close	0.7	\$850	\$595	Update staffing records for Brookdale San Jose using facility evaluation & complaint investigation reports provided by DSS	Case Organization, Planning and Strategy
3/10/2023	Travis Close	0.3	\$850	\$255	Meeting with co-counsel re: checking in on MSJ strategy, meet and confer, etc.	Case Organization, Planning and Strategy
3/10/2023	Travis Close	0.4	\$850	\$340	Email to MTJ re: strategy for next week's meet and confer call regarding access improvements and Anderson discovery	Case Organization, Planning and Strategy
3/10/2023	Travis Close	0.6	\$850	\$510	Update staffing records for Brookdale Murrieta using facility evaluation & complaint investigation reports provided by DSS	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/10/2023	Travis Close	0.7	\$850	\$595	Update staffing records for Brookdale Vacaville using facility evaluation & complaint investigation reports provided by DSS	Case Organization, Planning and Strategy
3/10/2023	Travis Close	2.2	\$850	\$1,870	Updates to employee recordkeeping spreadsheet & standardizing formatting before sending to LEC for further work	Case Organization, Planning and Strategy
3/13/2023	Travis Close	0.8	\$850	\$680	Review and analyze ninth circuit court's decision in Katy Van v. LLR re standing	Case Organization, Planning and Strategy
3/13/2023	Travis Close	1.5	\$850	\$1,275	Legal research re: cases where motions to stay were overturned pending a ruling on class certification	Case Organization, Planning and Strategy
3/13/2023	Travis Close	2.3	\$850	\$1,955	Draft analysis of access discovery missing from named Plaintiff facilities in advance of tomorrow's meet and confer call with Defs	Case Organization, Planning and Strategy
3/14/2023	Rachel Steyer	0.5	\$750	\$375	call with current resident, discussed case, scheduled intake call	Class Outreach and Contact
3/14/2023	Rachel Steyer	6.6	\$750	\$4,950	ongoing review and analysis of financial and rate increase docs gathered by JMP	Discovery (Non-Deposition)
3/14/2023	Travis Close	1.5	\$850	\$1,275	Updates to master discovery spreadsheet based on recent ESI documents produced by defendant	Case Organization, Planning and Strategy
3/14/2023	Travis Close	0.5	\$850	\$425	Review and analyze recent facility evaluation reports and complaint investigation reports issued for Clairemont, Folsom, Sylvan Ranch, Corona, and Auburn facilities	Case Organization, Planning and Strategy
3/15/2023	Rachel Steyer	0.3	\$750	\$225	call with son of current Brookdale resident, discussed case, scheduled formal intake call	Class Outreach and Contact
3/15/2023	Rachel Steyer	0.2	\$750	\$150	search in production for rate increase disclosure sheet	Discovery (Non-Deposition)
3/15/2023	Rachel Steyer	4.2	\$750	\$3,150	ongoing review of JMP gathered rate increase documents	Discovery (Non-Deposition)
3/16/2023	Rachel Steyer	5.2	\$750	\$3,900	ongoing review and analysis of JMP gathered finance and rate documents	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/16/2023	Rachel Steyer	1.8	\$750	\$1,350	reviewing additional rate increase disclosure sheets and updating figures in spreadsheet	Discovery (Non-Deposition)
3/16/2023	Travis Close	1.6	\$850	\$1,360	research recent decision in N.D.Ca. interpreting standing in class actions	Case Organization, Planning and Strategy
3/17/2023	Mark Johnson	0.6	\$1,150	\$690	team zoom meeting w/ GBW, GCG, TCC, RLS, BBK, AX, JY, Luke W, Brian U. re stay of discovery, strategy and progress on partial summary judgment motion, post certification discovery plan	Case Organization, Planning and Strategy
3/17/2023	Rachel Steyer	0.7	\$750	\$525	meeting with co-counsel and GBW, TCC, MTJ to review and discuss upcoming motions and discovery plans	Case Organization, Planning and Strategy
3/17/2023	Rachel Steyer	1.5	\$750	\$1,125	reviewing additional rate increase disclosure sheets gathered by JMP and updating spreadsheet	Discovery (Non-Deposition)
3/17/2023	Rachel Steyer	0.5	\$750	\$375	reviewing and analyzing billing by revenue detail spreadsheets	Discovery (Non-Deposition)
3/17/2023	Rachel Steyer	3.1	\$750	\$2,325	ongoing review and analysis of financial documents gathered by JMP	Discovery (Non-Deposition)
3/17/2023	Rachel Steyer	0.2	\$750	\$150	reading through JMP discovery memo	Discovery (Non-Deposition)
3/17/2023	Rachel Steyer	0.2	\$750	\$150	email to GBW sharing rate increase analysis	Discovery (Non-Deposition)
3/17/2023	Rachel Steyer	0.2	\$750	\$150	response to GBW about fees and sending document for review	Discovery (Non-Deposition)
3/17/2023	Rachel Steyer	0.2	\$750	\$150	response to GBW to question about explanation of inflation vis a vis BKD rate cost increases	Discovery (Non-Deposition)
3/17/2023	Travis Close	0.3	\$850	\$255	Email to LEC re review of Brookdale employee data entry assignment based on DSS records	Case Organization, Planning and Strategy
3/17/2023	Travis Close	0.8	\$850	\$680	Team meeting with MTJ, RLS, LEC, co-counsel re discovery status, summary judgment strategy, plaintiff updates	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/17/2023	Travis Close	0.5	\$850	\$425	Review and analyze recent DSS evaluation reports and complaints issued to Yorba Linda and Windsor facilities	Case Organization, Planning and Strategy
3/17/2023	Travis Close	0.2	\$850	\$170	Email to team & co-counsel re: updated discovery review memo	Case Organization, Planning and Strategy
3/17/2023	Travis Close	1.4	\$850	\$1,190	Revisions to discovery review memo following recent updates at DSS, judge Gilliam's order, Brookdale productions, etc.	Case Organization, Planning and Strategy
3/17/2023	Travis Close	0.9	\$850	\$765	Edits to spreadsheet tracking employee history at Brookdale facilities based on DSS data	Case Organization, Planning and Strategy
3/20/2023	Mark Johnson	0.3	\$1,150	\$345	call from Stacy Stiner re issues with delay of care, disrespectful treatment, proposed ltr to counsel re same.	Case Organization, Planning and Strategy
3/20/2023	Rachel Steyer	0.5	\$750	\$375	follow up call with declarant, conducted partial follow up intake but decided to postpone so she could send documents	Class Outreach and Contact
3/20/2023	Travis Close	0.3	\$850	\$255	Email to LEC re: updates to Brookdale employee recordkeeping project	Case Organization, Planning and Strategy
3/20/2023	Travis Close	1.8	\$850	\$1,530	Legal research on burden on plaintiff v. company defendant to demonstrate readily achievable barrier removal at summary judgment stage	Case Organization, Planning and Strategy
3/20/2023	Travis Close	1.4	\$850	\$1,190	Legal research on lay witness testimony (including declarations in support of a motion) for purposes of demonstrating a barrier is readily achievable	Case Organization, Planning and Strategy
3/20/2023	Travis Close	0.3	\$850	\$255	Email to GBW re: latest data on rent rolls at Brookdale facilities	Case Organization, Planning and Strategy
3/20/2023	Travis Close	0.6	\$850	\$510	Review and analyze latest reports produced by Brookdale showing resident occupancy at facilities	Case Organization, Planning and Strategy
3/21/2023	Rachel Steyer	0.3	\$750	\$225	follow up call with declarant, determined not necessary to conduct full follow up intake	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/21/2023	Rachel Steyer	0.3	\$750	\$225	call with declarant, provided case status update and scheduled follow up intake call	Class Outreach and Contact
3/21/2023	Rachel Steyer	5.2	\$750	\$3,900	ongoing review of financial documents gatehred by JMP, creating spreadsheet to track billing details	Discovery (Non-Deposition)
3/21/2023	Travis Close	0.6	\$850	\$510	Review and analyze recent facility evaluation and complaint investigation reports issued for Chanate, Redwood City, Kettleman Lane, Irvine, and Monrovia facilities	Case Organization, Planning and Strategy
3/21/2023	Travis Close	0.3	\$850	\$255	Email to GBW re: Brookdale's revenue & facility management counts in latest 10-k	Case Organization, Planning and Strategy
3/21/2023	Travis Close	0.7	\$850	\$595	Analyze Brookdale's latest three 10-ks for latest revenue/profit data and changes in facility management & ownership	Case Organization, Planning and Strategy
3/22/2023	Rachel Steyer	7.0	\$750	\$5,250	ongoing review of JMP finance and fees documents, updating billing detail revenue spreadsheet	Discovery (Non-Deposition)
3/23/2023	Rachel Steyer	2.3	\$750	\$1,725	conducted intake call with current resident, created file	Class Outreach and Contact
3/23/2023	Rachel Steyer	3.7	\$750	\$2,775	ongoing review of financial documents gathered by JMP, updating billing detail by revenue spreadsheet	Discovery (Non-Deposition)
3/23/2023	Travis Close	0.5	\$850	\$425	Review and analyze recent Form 4 SEC Docs (showing statement of changes in beneficial ownership) showing selling activities of executives	Case Organization, Planning and Strategy
3/23/2023	Travis Close	0.3	\$850	\$255	Email to GBW re: question about new owner liability for injunctive relief	Case Organization, Planning and Strategy
3/24/2023	Rachel Steyer	5.5	\$750	\$4,125	ongoing review of JMP finance gathered documents, updating detail billing by revenue spreadsheet	Discovery (Non-Deposition)
3/24/2023	Travis Close	0.3	\$850	\$255	Email to LEC re: progress on recordkeeping assignment & next week's tasks	Case Organization, Planning and Strategy
3/27/2023	Mark Johnson	0.4	\$1,150	\$460	review order from court re re-filing redacted pleadings; com w/ GBW and JY re same; draft and send email to OC re same.	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/27/2023	Travis Close	1.1	\$850	\$935	Analyze deficient filings in the ECF record by Defendants per today's court order	Case Organization, Planning and Strategy
3/28/2023	Mark Johnson	0.3	\$1,150	\$345	review statement from OC re refileing of redacted docs and refile documents	Class Certification
3/28/2023	Rachel Steyer	0.3	\$750	\$225	reviewing defendants' revised redactions in motions to exclude expert witnesses and expert declarations	Other Motions
3/28/2023	Travis Close	0.5	\$850	\$425	Review and analyze Brookdale's filing response to the court's order in ECF No. 590 to show cause on proposed redactions in class cert opposition filings	Case Organization, Planning and Strategy
3/28/2023	Travis Close	0.7	\$850	\$595	Review and analyze Sections 87405(d)(1) through (7) in regulations for Community Care Licensing for requirements to monitor changes in physical status of resident (investigation into Brookdale Central Whittier)	Case Organization, Planning and Strategy
3/29/2023	Rachel Steyer	4.4	\$750	\$3,300	ongoing review of financial documents	Discovery (Non-Deposition)
3/29/2023	Travis Close	1.6	\$850	\$1,360	Legal research on new rules allowing REIT owners of senior living properties to self-manage those properties	Case Organization, Planning and Strategy
3/29/2023	Travis Close	1.6	\$850	\$1,360	Investigate Brookdale's use of contract labor in 2021-2022 and its effect on staffing levels at the CA facilities	Case Organization, Planning and Strategy
3/30/2023	Guy Wallace	3.4	\$1,350	\$4,590	review and analysis of district court decision re class certification; com's with CJH and MTJ re same	Class Certification
3/30/2023	Guy Wallace	0.8	\$1,350	\$1,080	zoom with GG; JY; BBK; AX; BU; MTJ re district court decision re class certification	Class Certification
3/30/2023	Guy Wallace	4.1	\$1,350	\$5,535	review and analysis of district court decision re class certification and legal errors therein; com's with GG; BU; MTJ re same	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/30/2023	Guy Wallace	2.2	\$1,350	\$2,970	review and analysis of district court decision re class certification and legal errors therein; com's with MTJ re errors re ADA class (.6)	Class Certification
3/30/2023	Mark Johnson	1.1	\$1,150	\$1,265	1st review and analysis of decision partially granting and partially denying class certification.	Class Certification
3/30/2023	Mark Johnson	0.8	\$1,150	\$920	zoom mtg w/ COC RBGG team, Umpierre, GBW, etc. re analysis of court decision mostly denying class certification, issues and errors in same, possible 23(f) petition and scope of same	Class Certification
3/30/2023	Mark Johnson	5.6	\$1,150	\$6,440	further review and analysis of order denying class cert, identification of issues for 23(f); multiple calls w/ GBW re same	Class Certification
3/30/2023	Rachel Steyer	2.2	\$750	\$1,650	reading through and analyzing court order on class cert. motion	Class Certification
3/30/2023	Rachel Steyer	1.0	\$750	\$750	ongoing review of relevant financial documents	Discovery (Non-Deposition)
3/30/2023	Travis Close	1.9	\$850	\$1,615	Review and analyze court's decision on class certification	Case Organization, Planning and Strategy
3/30/2023	Travis Close	1.7	\$850	\$1,445	Legal research on architectural similarities involving multiple facilities in cases filed under the ADA	Case Organization, Planning and Strategy
3/30/2023	Travis Close	1.4	\$850	\$1,190	Legal research on cases distinguishing Castaneda v. Burger King Corp in granting class certification for companies with multiple architect-facilities	Case Organization, Planning and Strategy
3/30/2023	Travis Close	0.3	\$850	\$255	Email to LEC re: question about latest correspondence with access experts	Case Organization, Planning and Strategy
3/30/2023	Travis Close	0.7	\$850	\$595	Analyze evidence submitted in motion for class certification related to Brookdale's refusal to address architectural barriers	Case Organization, Planning and Strategy
3/30/2023	Travis Close	0.3	\$850	\$255	Email to GBW re: thoughts on court's decision today	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/31/2023	Guy Wallace	4.3	\$1,350	\$5,805	preparation and drafting of analysis re errors of law and fact in district court's class certification opinion; com's with MTJ re same (.9)	Appeal
3/31/2023	Guy Wallace	1.1	\$1,350	\$1,485	zoom with GG; JY; BBK; AX; BU; MTJ re errors in district court's opinion re class certification and preparation of 23(f) petition	Appeal
3/31/2023	Guy Wallace	1.1	\$1,350	\$1,485	com's with JY; MTJ; RLS re preparation of outline of Rule 23(f) petition	Appeal
3/31/2023	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of order re class certification; misleading statements and omissions class	Class Certification
4/7/2023	Travis Close	0.4	\$850	\$340	Review and analyze revised draft of rule 23(f) insert regarding CLRA & elder abuse claims	Appeal
4/7/2023	Travis Close	0.4	\$850	\$340	Review and analyze revised draft of rule 23(f) insert regarding CLRA & elder abuse claims	Appeal
4/16/2023	Guy Wallace	3.5	\$1,350	\$4,725	analysis of class certification decision and procedural implications and next steps	Case Management Conferences
4/17/2023	Guy Wallace	0.8	\$1,350	\$1,080	com's with GG; JY; BU; MTJ re CMC statement and revisions thereto; facility-level classes and further motions re same	Case Management Conferences
4/17/2023	Guy Wallace	1.8	\$1,350	\$2,430	review and analysis of drafts of CMC statement; revise and edit same	Case Management Conferences
4/17/2023	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ re preparation of potential further motion re facility-level classes re access barriers; emergency evacuation plans	Class Certification
4/17/2023	Guy Wallace	0.6	\$1,350	\$810	review and analysis of Burger King pleadings re facility-level classes	Class Certification
4/17/2023	Guy Wallace	0.8	\$1,350	\$1,080	com's with MTJ re further class outreach and identification of potential plaintiffs re facility classes; review and analysis of draft script re same	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/17/2023	Mark Johnson	0.6	\$1,150	\$690	Review and analyze D sections of draft CMC statement	Case Management Conferences
4/17/2023	Mark Johnson	0.8	\$1,150	\$920	call w GBW re various strategies for proceeding with claims on facility class basis and individual claims, outreach, amendments to complaint, additional plaintiffs, transportation class, etc.	Case Organization, Planning and Strategy
4/17/2023	Mark Johnson	0.5	\$1,150	\$575	call with GBW re strategies for proceeding with prosecution of claims in the event that 23(f) is not granted; prep for CMC, draft CMC statement	Case Organization, Planning and Strategy
4/17/2023	Mark Johnson	0.7	\$1,150	\$805	Zoom call with GBW, Grunfeld, Yellin, Umpierre re strategy going forward independent of appeal, CMC statement, demand for class list, amending complaint, certification of facility-based classes, notice to class and to putative class members of end of tolling	Case Organization, Planning and Strategy
4/17/2023	Mark Johnson	0.6	\$1,150	\$690	call w/ T Close and J Kailes re scope and reasoning of class cert decision; strategy for proceeding with motions for facility-based classes, potential further expert services	Case Organization, Planning and Strategy
4/17/2023	Mark Johnson	1.0	\$1,150	\$1,150	calls w/ Wallace (x4) re further analysis of class cert decision, strategy going forward, cmc statement, calls w/ potential amicus and expert	Case Organization, Planning and Strategy
4/17/2023	Mark Johnson	1.2	\$1,150	\$1,380	further review and analysis of class cert decision, including emergency evacuation and misrepresentation sections for conversations w/ potential amicus and expert June Kailes	Case Organization, Planning and Strategy
4/17/2023	Mark Johnson	0.3	\$1,150	\$345	confer w/ Co-counsel re D's sections of draft CMC and potential revisions based on same.	Case Organization, Planning and Strategy
4/17/2023	Rachel Steyer	3.8	\$750	\$2,850	ongoing ADA chapman standing research into non access barrier cases	Appeal

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/17/2023	Rachel Steyer	0.2	\$750	\$150	reviewing defendants' portion of draft CMC statement	Case Management Conferences
4/17/2023	Rachel Steyer	0.7	\$750	\$525	drafting outreach script for class member declarants to discuss becoming named plaintiffs	Class Outreach and Contact
4/17/2023	Rachel Steyer	2.1	\$750	\$1,575	reviewing and reading through pleadings circulated by GG	Misc. Research
4/17/2023	Travis Close	0.3	\$850	\$255	Email to MTJ re: meeting with June Kailes to discuss court's order and next steps	Case Organization, Planning and Strategy
4/17/2023	Travis Close	0.4	\$850	\$340	Prep for today's meeting with JIK (review and analyze the court's orders re emergency evacuation issues)	Case Organization, Planning and Strategy
4/17/2023	Travis Close	0.7	\$850	\$595	Call with JIK and MTJ re: next steps for emergency evacuation issues at Brookdale facilities	Case Organization, Planning and Strategy
4/17/2023	Travis Close	0.3	\$850	\$255	Review and analyze updated joint CMC statement with Defndts' section incorporated	Case Organization, Planning and Strategy
4/18/2023	Guy Wallace	2.3	\$1,350	\$3,105	revise and edit script re further outreach for potential facility-level plaintiffs; com's with GG; MTJ; RLS re same	Class Certification
4/18/2023	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis re district court decision re class certification	Class Certification
4/18/2023	Guy Wallace	2.0	\$1,350	\$2,700	analysis of potential motion to certify facility-level classes	Class Certification
4/18/2023	Guy Wallace	0.9	\$1,350	\$1,215	com's with MTJ re potential motion for PSJ re access barriers; FSP	Motion for Summary Judgment / Adjudicaiton
4/18/2023	Mark Johnson	2.9	\$1,150	\$3,335	calls w/ GBW (x8) re strategy going forward if 23f petition is not granted, including outreach for new plaintiffs, amending complaint to identify barriers and add plaintiffs and propose facility-by-facility barriers, notice to class and putative class members, trail presentation, possible separate new cases.	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/18/2023	Mark Johnson	1.6	\$1,150	\$1,840	prepare chart of issues re individual facilities and plaintiff including summary of inspections, status of residency, etc.; review inspection reports and other docs for same; com w/ COC re same.	Case Organization, Planning and Strategy
4/18/2023	Rachel Steyer	0.3	\$750	\$225	call with TAH to review upcoming declarant outreach project	Class Outreach and Contact
4/18/2023	Rachel Steyer	0.7	\$750	\$525	updating notes in declarant named plaintiff tracking spreadsheet	Class Outreach and Contact
4/18/2023	Rachel Steyer	0.4	\$750	\$300	call with class member declarant to discuss becoming named plaintiff, providing case status update	Class Outreach and Contact
4/18/2023	Rachel Steyer	0.2	\$750	\$150	updating draft outreach script to incorporate GBW's edits and changes	Class Outreach and Contact
4/18/2023	Rachel Steyer	3.6	\$750	\$2,700	conducting background checks of declarants	Class Outreach and Contact
4/18/2023	Rachel Steyer	0.3	\$750	\$225	reviewing GCG notes provided summarizing 2019 visit to Brookhurst facility	Discovery (Non-Deposition)
4/18/2023	Travis Close	1.4	\$850	\$1,190	Review and analyze filings in procedurally similar case Casteneda v. Burger King (certifying restaurant-based classes) received from their counsel	Case Organization, Planning and Strategy
4/18/2023	Travis Close	0.2	\$850	\$170	Review and analyze further edits by co-counsel to joint CMC statement	Case Organization, Planning and Strategy
4/18/2023	Travis Close	0.4	\$850	\$340	Review and analyze updated joint case management statement, as filed	Case Organization, Planning and Strategy
4/18/2023	Travis Close	1.6	\$850	\$1,360	Create new chart/table showing key data on Brookdale facilities inspected by our experts	Case Organization, Planning and Strategy
4/18/2023	Travis Close	0.2	\$850	\$170	Email to RLS re: info on facilities inspected by our architectural experts	Case Organization, Planning and Strategy
4/19/2023	Guy Wallace	1.3	\$1,350	\$1,755	com's with GG; JY; MTJ; RLS re outreach for potential plaintiffs for facility-level classes	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/19/2023	Mark Johnson	2.0	\$1,150	\$2,300	Draft outline of tasks and strategy going forward with claims in district court assuming 23 f petition not granted, review March 30 decision and other documents for same	Case Organization, Planning and Strategy
4/19/2023	Mark Johnson	0.3	\$1,150	\$345	further review of script for coms with former putative class members; email coms w/ Yelin and Steyer re same	Case Organization, Planning and Strategy
4/19/2023	Mark Johnson	0.5	\$1,150	\$575	calls (x3) with Wallace re outline of litigation / discovery plan, amicus on 23(f) petition, strategy for MSJs and renewed class cert petition on facility basis	Case Organization, Planning and Strategy
4/19/2023	Mark Johnson	4.0	\$1,150	\$4,600	research and begin drafting memo on notice to putative class members following denial of class cert motion.	Class Certification
4/19/2023	Rachel Steyer	4.0	\$750	\$3,000	ongoing Chapman research into applcation to non access barrier case law	Appeal
4/19/2023	Rachel Steyer	1.4	\$750	\$1,050	ongoing declarant background checks, updating notes in spreadsheet	Class Outreach and Contact
4/19/2023	Rachel Steyer	0.3	\$750	\$225	spoke with declarant concerning possibility of serving as named plaintiff, answered questions	Class Outreach and Contact
4/19/2023	Rachel Steyer	0.2	\$750	\$150	spoke with declarant about becoming named plaintiff, not interested	Class Outreach and Contact
4/19/2023	Rachel Steyer	0.3	\$750	\$225	spoke with declarant about becoming named plaintiff, she is interested, agreed to follow up	Class Outreach and Contact
4/19/2023	Rachel Steyer	0.2	\$750	\$150	response to JSY, GCG, MTJ, BU, GBW concerning outreach script	Class Outreach and Contact
4/19/2023	Travis Close	0.4	\$850	\$340	Review and analyze recent complaint investigation and facility evaluation reports issued for Mirage Inn, Murrieta, Clairemont, and Redwood City facilities	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/19/2023	Travis Close	1.5	\$850	\$1,275	Analyze status of completion on employee recordkeeping assignment for accuracy & tracking facilities no longer operated by Brookdale; compare to Personnel reports received	Case Organization, Planning and Strategy
4/19/2023	Travis Close	0.2	\$850	\$170	Email to LEC re: completion of employee recordkeeping tracking assignment	Case Organization, Planning and Strategy
4/20/2023	Guy Wallace	0.7	\$1,350	\$945	preparation for 4/25 CMC and issues to be addressed; review and analysis of Oliver v. Ralphs Grocery	Case Management Conferences
4/20/2023	Guy Wallace	2.4	\$1,350	\$3,240	analysis of proceeding with case on an individual basis re six facilities re eight plaintiffs; com's with MTJ re same	Case Organization, Planning and Strategy
4/20/2023	Guy Wallace	0.7	\$1,350	\$945	prepare for and participate in zoom with Fox; Robertson; GG; JY; MTJ re facility-level approach to class certification in Burger King case	Class Certification
4/20/2023	Rachel Steyer	0.3	\$750	\$225	updating notes in declarant-named plaintiff tracking spreadsheet	Class Outreach and Contact
4/20/2023	Rachel Steyer	0.4	\$750	\$300	spoke with declarant about possibility of becoming named plaintiff, agreed to follow up in the next day or two	Class Outreach and Contact
4/20/2023	Rachel Steyer	0.2	\$750	\$150	spoke with declarant about possibility of becoming a named plaintiff, said she wanted to take a few days to think it over and would follow up	Class Outreach and Contact
4/20/2023	Rachel Steyer	0.5	\$750	\$375	spoke with declarant, provided case update and discussed possibility of serving as named plaintiff, agreed to follow up	Class Outreach and Contact
4/20/2023	Rachel Steyer	0.3	\$750	\$225	received call back from declarant, discussed possibility of serving as named plaintiff, wanted to take a few days to consider it	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/20/2023	Rachel Steyer	0.2	\$750	\$150	call with declarant, discussed possibility of serving as named plaintiff, said she wants to take a few days to think about it	Class Outreach and Contact
4/20/2023	Rachel Steyer	0.2	\$750	\$150	call with declarant to discuss possibility of serving as named plaintiff, agreed to follow up in a few days	Class Outreach and Contact
4/20/2023	Rachel Steyer	0.2	\$750	\$150	spoke with declarant, he is interested in serving as named plaintiff	Class Outreach and Contact
4/20/2023	Rachel Steyer	0.2	\$750	\$150	spoke with declarant, she is not interested in serving as named plaintiff	Class Outreach and Contact
4/20/2023	Rachel Steyer	0.4	\$750	\$300	spoke with declarant about possibility of serving as named plaintiff, wanted to take a few days to think about it, follow up on Monday	Class Outreach and Contact
4/20/2023	Rachel Steyer	0.3	\$750	\$225	spoke with declarant about possibility of serving as named plaintiff, agreed to follow up in a few days	Class Outreach and Contact
4/20/2023	Rachel Steyer	0.3	\$750	\$225	spoke with declarant about possibility of serving as named plaintiff, he is interested and agreed to follow up	Class Outreach and Contact
4/20/2023	Rachel Steyer	0.4	\$750	\$300	call with declarant to discuss possibility of serving as named plaintiff, she expressed interest, agreed to follow up with next steps	Class Outreach and Contact
4/20/2023	Rachel Steyer	0.6	\$750	\$450	spoke with declarant about possibility of serving as a named plaintiff, expressed interest and willingness to do so, discussed next steps	Class Outreach and Contact
4/21/2023	Guy Wallace	0.7	\$1,350	\$945	prepare for 4/25 CMC; com's with MTJ re same	Case Management Conferences
4/21/2023	Guy Wallace	1.1	\$1,350	\$1,485	zoom with GG; JY; BU; MTJ re preparation for 4/25 CMC	Case Management Conferences
4/21/2023	Guy Wallace	0.6	\$1,350	\$810	com's with CJH; BU re district court comments re consumer survey or conjoint analysis; relief available to estates	Misc. Research

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/21/2023	Guy Wallace	0.2	\$1,350	\$270	com's with RLS re potential further facility-level plaintiffs	Pleadings and Motions Re: Pleadings
4/21/2023	Mark Johnson	1.6	\$1,150	\$1,840	zoom mtg w/ Wallace, Grunfeld, Yelin, Umpierre re issues and strategy for CMC presentation, amending complaint, summary judgment, facility-based subclasses, notice to class and putative class	Case Organization, Planning and Strategy
4/21/2023	Rachel Steyer	1.1	\$750	\$825	ongoing Chapman research as applied in non-access barrier context	Appeal
4/21/2023	Rachel Steyer	0.2	\$750	\$150	call with declarant to discuss possibility of serving as named plaintiff, said she was not interested	Class Certification
4/21/2023	Rachel Steyer	0.3	\$750	\$225	follow up call with declarant, expressed interest in serving as named plaintiff, agreed to follow up	Class Outreach and Contact
4/21/2023	Rachel Steyer	0.2	\$750	\$150	updating and reviewing notes in declarant named plaintiff spreadsheet	Class Outreach and Contact
4/21/2023	Rachel Steyer	1.6	\$750	\$1,200	completing background checks and searches into declarants for eligibility to become named plaintiffs	Class Outreach and Contact
4/21/2023	Rachel Steyer	0.2	\$750	\$150	received call back from declarant, discussed possibility of serving as named plaintiff, said she's interested and will follow up on Monday	Class Outreach and Contact
4/21/2023	Rachel Steyer	0.2	\$750	\$150	spoke with declarant about possibility of serving as named plaintiff, not interested	Class Outreach and Contact
4/21/2023	Rachel Steyer	0.5	\$750	\$375	call with declarant to discuss possibility of serving as named plaintiff	Class Outreach and Contact
4/21/2023	Rachel Steyer	0.2	\$750	\$150	call with declarant about possibility of becoming named plaintiff, said she was not interested	Class Outreach and Contact
4/24/2023	Rachel Steyer	0.3	\$750	\$225	follow up call with declarant to discuss possibility of serving as named declarant, indicated interest	Class Outreach and Contact
4/24/2023	Rachel Steyer	0.2	\$750	\$150	updating notes in declarant named plaintiff tracking spreadsheet	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/24/2023	Rachel Steyer	0.2	\$750	\$150	received call back from declarant, expressed interest and willingness in becoming named plaintiff	Class Outreach and Contact
4/24/2023	Rachel Steyer	0.3	\$750	\$225	call with declarant, discussed possibility of serving as named plaintiff and next steps	Class Outreach and Contact
4/24/2023	Rachel Steyer	0.2	\$750	\$150	response to GBW providing update about status of declarant named plaintiff outreach project	Class Outreach and Contact
4/24/2023	Rachel Steyer	0.3	\$750	\$225	follow up call with declarant to discuss interest in serving as named plaintiff	Class Outreach and Contact
4/24/2023	Rachel Steyer	0.5	\$750	\$375	spoke with declarant to discuss possibility of her serving as named plaintiff, discussed next steps	Class Outreach and Contact
4/24/2023	Travis Close	0.3	\$850	\$255	Email to JUB re: analysis of fleet safety policy acknowledgement agreements	Appeal
4/24/2023	Travis Close	0.7	\$850	\$595	Collect, review and analyze acknowledgement agreements signed by Brookdale drivers, attesting to the FSP, as an example of common evidence for class cert	Appeal
4/24/2023	Travis Close	0.2	\$850	\$170	Email to JUB re: corrected fleet safety acknowledgement forms signed by CDL drivers of Brookdale vehicles	Appeal
4/24/2023	Travis Close	1.2	\$850	\$1,020	Legal research on case examples of Title III of ADA covering emergency evacuation	Case Organization, Planning and Strategy
4/25/2023	Guy Wallace	1.4	\$1,350	\$1,890	prepare for and participate in CMC with Judge Gilliam; com's with GG; JY; MTJ re results thereof	Case Management Conferences
4/25/2023	Mark Johnson	1.0	\$1,150	\$1,150	appearance at CMC and pre/post conferences w/ Cocounsel re same	Case Management Conferences
4/25/2023	Rachel Steyer	0.2	\$750	\$150	spoke with declarant about possibility of serving as named plaintiff, discussed next steps	Class Outreach and Contact
4/25/2023	Rachel Steyer	0.2	\$750	\$150	follow up call with declarant to provide update as to proceeding ahead with named plaintiff	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/26/2023	Rachel Steyer	0.5	\$750	\$375	zoom meeting with GCG and declarant to discuss and review possibility of serving as named plaintiff	Class Outreach and Contact
4/28/2023	Rachel Steyer	0.2	\$750	\$150	received call back from declarant, discussed possibility of serving as named plaintiff	Class Outreach and Contact
4/28/2023	Rachel Steyer	0.4	\$750	\$300	received call back from declarant, discussed possibility of serving as named plaintiff, agreed to follow up	Class Outreach and Contact
5/1/2023	Travis Close	0.5	\$850	\$425	Emails to MTJ re: status and recap of residency agreement arbitration review project	Case Organization, Planning and Strategy
5/1/2023	Travis Close	0.7	\$850	\$595	Analysis of residency agreement database to determine date range of agreements reviewed	Case Organization, Planning and Strategy
5/1/2023	Travis Close	1.3	\$850	\$1,105	Review and analyze communications & filings in Spring 2021 re: residency agreement arbitration analysis to determine any differences between Def's vs. our analysis	Case Organization, Planning and Strategy
5/2/2023	Mark Johnson	0.1	\$1,150	\$115	mtg w/ J Proctor re status of document review, status of case and possible refocusing of efforts.	Discovery (Non-Deposition)
5/2/2023	Mark Johnson	7.8	\$1,150	\$8,970	continue working on draft of admin motion for class notice and legal research for same.	Other Motions
5/2/2023	Rachel Steyer	0.4	\$750	\$300	received call back from declarant, discussed case status update and possibility of serving as named plaintiff	Class Outreach and Contact
5/2/2023	Travis Close	0.5	\$850	\$425	Review and analyze recent facility evaluation and complaint investigation reports issued for Brookhurst, Oceanside, Lodi, Scotts Valley, Chanate facilities	Case Organization, Planning and Strategy
5/2/2023	Travis Close	0.2	\$850	\$170	Review and analyze court's order re next month's briefing schedule	Case Organization, Planning and Strategy
5/2/2023	Travis Close	0.3	\$850	\$255	Email to team re analysis of transportation services using residency agreement addendum info	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/4/2023	Rachel Steyer	0.4	\$750	\$300	received call back from declarant, provided case status update	Class Outreach and Contact
5/4/2023	Rachel Steyer	0.4	\$750	\$300	received follow up call from Brookdale Loma Linda resident, discussed case status update	Class Outreach and Contact
5/4/2023	Rachel Steyer	0.4	\$750	\$300	reviewing discovery letter briefs for reference to request for PSS data	Other Motions
5/4/2023	Travis Close	1.7	\$850	\$1,445	Edits to discovery chart compiling joint letter briefs and related court orders	Case Organization, Planning and Strategy
5/4/2023	Travis Close	0.8	\$850	\$680	Review Dr. Flores' analysis on residents who use electric wheelchair/scooters for completeness in data	Case Organization, Planning and Strategy
5/9/2023	Travis Close	1.2	\$850	\$1,020	Investigation into recent citations issued to name plaintiff facilities by Cal DSS, and which pertain to staffing	Case Organization, Planning and Strategy
5/9/2023	Travis Close	2.3	\$850	\$1,955	Analyze staffing data & conclusions by experts to determine the differences in actual staffing hours v. benchmarks at named plaintiff facilities	Case Organization, Planning and Strategy
5/9/2023	Travis Close	1.9	\$850	\$1,615	Review, sample, and analyze residency agreements in database to determine whether transportation service clauses are attached to all addendums	Case Organization, Planning and Strategy
5/9/2023	Travis Close	1.4	\$850	\$1,190	Review discovery history, RFPs/rogs & joint letter briefs re: staffing benchmarks to determine viability of renewed discovery	Case Organization, Planning and Strategy
5/11/2023	Rachel Steyer	0.5	\$750	\$375	updating and working on spreadsheet for potential additional named plaintiffs	Class Outreach and Contact
5/11/2023	Rachel Steyer	0.2	\$750	\$150	received call back from declarant, follow up discussion about possibility of serving as named plaintiff	Class Outreach and Contact
5/15/2023	Jennifer Bybee	1.5	\$925	\$1,388	Research Clevenger-like cases for oral argument prep	Other Motions
5/15/2023	Rachel Steyer	0.3	\$750	\$225	follow up call with declarant to review status of residency agreement	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/15/2023	Rachel Steyer	0.5	\$750	\$375	double checking declarant files for residency agreement to review class member status	Discovery (Non-Deposition)
5/16/2023	Jennifer Bybee	1.9	\$925	\$1,758	Research whether expert evidence is required to establish an overpayment injury	Misc. Research
5/17/2023	Rachel Steyer	0.4	\$750	\$300	call with Brookdale declarant to provide case status update/follow up from email	Class Outreach and Contact
5/25/2023	Travis Close	1.2	\$850	\$1,020	Review and analyze recent facility evaluation and complaint investigation reports issued for San Dimas, Brookhurst, Yorba Linda, Auburn, Elk Grove, Clairemont, Central Whittier, Auburn, Corona, and North Euclid facilities	Case Organization, Planning and Strategy
5/26/2023	Mark Johnson	2.0	\$1,150	\$2,300	coms w/ RLS and TCC re evidence to show D's tracking of wheelchair users, review documents, testimony and begin drafting declarations.	Other Motions
5/26/2023	Rachel Steyer	0.2	\$750	\$150	follow up call with declarant to provide case status update	Class Outreach and Contact
5/26/2023	Travis Close	1.7	\$850	\$1,445	Draft analysis of evidence that brookdale facilities maintain ambulatory status information for residents at facilities	Case Organization, Planning and Strategy
5/30/2023	Travis Close	0.5	\$850	\$425	Analysis of BEST audit questions for requirements related to use of assistive devices & emergency evacuation	Discovery (Non-Deposition)
5/31/2023	Guy Wallace	1.5	\$1,350	\$2,025	review and analysis of denial of Rule 23(f) petition and implications thereof for further proceedings	Appeal
5/31/2023	Jennifer Bybee	0.1	\$925	\$93	Review Order denying petition for review	Appeal
5/31/2023	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re denial of 23(f) petition and next steps.	Appeal
5/31/2023	Travis Close	0.3	\$850	\$255	Email to team discussing today's decision by ninth circuit and next steps	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/31/2023	Travis Close	1.3	\$850	\$1,105	Research propriety of facility-based classes alleging similar architectural deficiencies under accessibility laws	Case Organization, Planning and Strategy
6/5/2023	Travis Close	1.9	\$850	\$1,615	Review and analyze court's decision denying class cert to examine viability/justification of facility-based classes	Case Organization, Planning and Strategy
6/5/2023	Travis Close	0.3	\$850	\$255	Email to GBW re: facility-based architecture and variation analysis	Case Organization, Planning and Strategy
6/5/2023	Travis Close	1.8	\$850	\$1,530	Analysis of Brookdale's systems for tracking resident assessment questions/data compared to representations in Def's briefing	Case Organization, Planning and Strategy
6/6/2023	Guy Wallace	0.8	\$1,350	\$1,080	analysis of further motions and issues remaining to be litigated; com's with Waters re same	Case Organization, Planning and Strategy
6/6/2023	Rachel Steyer	0.3	\$750	\$225	reviewing defendants' admin motion to seal	Other Motions
6/6/2023	Travis Close	0.3	\$850	\$255	Review and analyze Exhs of Brookdale employees filed in support of motion for sur reply	Case Organization, Planning and Strategy
6/7/2023	Rachel Steyer	0.4	\$750	\$300	received call from Brookdale caller, discussed and advised on caller's questions	Class Outreach and Contact
6/12/2023	Travis Close	0.8	\$850	\$680	Review and analyze recent facility evaluation and complaint investigation reports issued for Citrus Heights, Grand Terrace, Clairemont, Murrieta, Redwood City, Tracy, Kettleman Lane, and Irvine facilities	Case Organization, Planning and Strategy
6/12/2023	Travis Close	2.4	\$850	\$2,040	Draft analysis of common types of barriers identified at plaintiffs' facilities	Case Organization, Planning and Strategy
6/12/2023	Travis Close	2.2	\$850	\$1,870	Legal research on prior class actions brought under federal/state disability laws certified based on single-facility features	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/13/2023	Travis Close	2.3	\$850	\$1,955	Analysis of prior sealing motions to determine whether proposed evidence to be redacted as part of motion for notice was subject to disclosure prior	Other Motions
6/15/2023	Rachel Steyer	0.7	\$750	\$525	received call from son of current Brookdale resident, discussed case and provided resources	Class Outreach and Contact
6/15/2023	Travis Close	0.6	\$850	\$510	Prep for call with team & co-counsel re: next steps (review prior CMC statement; analyze unfinished tasks; and notes on prospective assignments)	Case Organization, Planning and Strategy
6/15/2023	Travis Close	0.4	\$850	\$340	Team meeting re: strategy for notice to class members & next steps for CMC	Case Organization, Planning and Strategy
6/15/2023	Travis Close	1.3	\$850	\$1,105	Review and analyze declarations submitted by class members impacted by Fleet Transportation policy & facilities included	Case Organization, Planning and Strategy
6/20/2023	Travis Close	1.2	\$850	\$1,020	Analyze lists of common barriers found by experts Mastin & Waters and compare to barriers at Scotts Valley facility	Case Organization, Planning and Strategy
6/20/2023	Travis Close	1.3	\$850	\$1,105	Compare common barrier lists by architectural experts to barriers found at Fountaingrove facility	Case Organization, Planning and Strategy
6/20/2023	Travis Close	0.2	\$850	\$170	Email to GBW re: common barrier lists	Case Organization, Planning and Strategy
6/20/2023	Travis Close	1.4	\$850	\$1,190	Review and analyze recent facility evaluation and complaint investigation reports issued for Tracy, North Euclid, Murrieta, Mirage Inn, and Irvine facilities	Case Organization, Planning and Strategy
6/21/2023	Guy Wallace	0.3	\$1,350	\$405	com's with GG re preparation of partial summary judgment motion(s)	Motion for Summary Judgment / Adjudication
6/23/2023	Travis Close	1.7	\$850	\$1,445	Analyze & compare named-plaintiff facility floor plans to determine common barrier placement locations	Case Organization, Planning and Strategy
6/26/2023	Travis Close	1.3	\$850	\$1,105	Legal research regarding decertification of class based on change of policy where statutory damages were alleged	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/27/2023	Travis Close	1.5	\$850	\$1,275	Review and analyze recent facility evaluation and complaint investigation reports issued by DSS for Windsor, Scotts Valley, San Jose, Tracy, Oceanside, Clairemont, North Euclid, Murrieta, Valley View, Ocean House, Alhambra, Central Whittier, Santa Monica, and Riverwalk facilities	Case Organization, Planning and Strategy
6/30/2023	Rachel Steyer	0.4	\$750	\$300	reviewing defendants' fillings re administrative motion to seal	Other Motions
6/30/2023	Travis Close	1.3	\$850	\$1,105	Analysis of Brookdale's recent quarterly reports to determine recent sale/lease/manager activity in remaining California facilities	Case Organization, Planning and Strategy
7/6/2023	Travis Close	0.5	\$850	\$425	Review and analyze recently published facility evaluation reports and complaint investigation reports issued for Ocean House, North Euclid, Place of San Marcos, and Chanate facilities	Case Organization, Planning and Strategy
7/6/2023	Travis Close	1.4	\$850	\$1,190	Research & analyze occasions of unassisted falls at named plaintiff Brookdale facilities during previous two years	Case Organization, Planning and Strategy
7/7/2023	Travis Close	1.8	\$850	\$1,530	Analysis of Brookdale's recent quarterly reports, including lease/management arrangements, to determine its responsibility vs. partners to maintain/repair facility infrastructure	Case Organization, Planning and Strategy
7/7/2023	Travis Close	1.6	\$850	\$1,360	Research requirements for accessible units on ground floor of apartment buildings under the Fair Housing Act	Case Organization, Planning and Strategy
7/11/2023	Mark Johnson	0.6	\$1,150	\$690	calls w GBW re oral argument on 23f appeal and potential impact and opportunities created by possible favorable decision - renewal / reconsideration of class certification decision.	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/11/2023	Travis Close	1.6	\$850	\$1,360	Legal research re: whether change of policy moots claims for injunctive relief under rule 23(b)(2)	Case Organization, Planning and Strategy
7/11/2023	Travis Close	1.9	\$850	\$1,615	Analysis of facilities where residents complained of transportation deficiencies through emails to Brookdale employees/management	Case Organization, Planning and Strategy
7/11/2023	Travis Close	1.3	\$850	\$1,105	Update master facility spreadsheet with list of recently acquired/divested facilities in California	Discovery (Non-Deposition)
7/12/2023	Travis Close	2.3	\$850	\$1,955	draft analysis of court's basis for denying class cert under staffing claims vs. Heredia court's basis for granting class cert on same claims	Case Organization, Planning and Strategy
7/12/2023	Travis Close	0.9	\$850	\$765	Analysis of closet photos taken by Waters at Fountaingrove facility to determine viability of access claims based on common design	Case Organization, Planning and Strategy
7/13/2023	Rachel Steyer	0.6	\$750	\$450	follow up call with Brookdale caller, discussed case and answered questions	Class Outreach and Contact
7/13/2023	Travis Close	1.7	\$850	\$1,445	Legal research on viability of renewed motion for class certification following favorable appellate guidance in related case	Case Organization, Planning and Strategy
7/13/2023	Travis Close	0.4	\$850	\$340	Email to RLS re: dates of recently divested & acquired Brookdale facilities	Case Organization, Planning and Strategy
7/13/2023	Travis Close	0.3	\$850	\$255	Email to GBW re: question about viability of renewed class claims at facility level	Case Organization, Planning and Strategy
7/14/2023	Guy Wallace	1.5	\$1,350	\$2,025	prepare for and participate in zoom with GG; JY; BBK; MTJ; TCC; RLS re Sunrise appeal and implications for Brookdale; PSJ motion; further steps re renewed motion(s) for class certification	Case Organization, Planning and Strategy
7/14/2023	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ re potential motion to lift stay on discovery; seek class member contact information	Discovery (Non-Deposition)
7/14/2023	Rachel Steyer	0.7	\$750	\$525	monthly check in meeting with GBW, MTJ, TCC and RBGG co-counsel	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/14/2023	Travis Close	0.8	\$850	\$680	Meeting with team & co-counsel re: strategy or upcoming motion for summary judgment & renewed motion for class cert	Case Organization, Planning and Strategy
7/14/2023	Travis Close	1.4	\$850	\$1,190	Legal research on scope of inherently transitory exception to standing in context of disability access claims (ADA, Section 504, Unruh)	Case Organization, Planning and Strategy
7/14/2023	Travis Close	1.6	\$850	\$1,360	Legal research on inherently transitory exception as applied in assistant living cases to achieve standing where plaintiffs are deceased	Case Organization, Planning and Strategy
7/14/2023	Travis Close	1.3	\$850	\$1,105	Legal research on whether a plaintiff has standing to seek injunctive relief under ADA/Unruh Act at facilities where she no longer lives	Case Organization, Planning and Strategy
7/20/2023	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW re timing of Sunrise decision in 9th circuit, en banc petition and cert, and impact on case progress	Case Organization, Planning and Strategy
7/20/2023	Mark Johnson	1.2	\$1,150	\$1,380	review of stay order, mtn for stay and proposed order, prior discovery pending at time of stay, demand letter for possible resumption of discovery.	Discovery (Non-Deposition)
7/25/2023	Rachel Steyer	0.4	\$750	\$300	reviewing draft MTJ RFPs set nine	Discovery (Non-Deposition)
7/25/2023	Travis Close	0.8	\$850	\$680	Review, analyze, & propose additions and revisions to draft ninth set of RFPs	Case Organization, Planning and Strategy
7/25/2023	Travis Close	1.3	\$850	\$1,105	Research status of management & ownership at plaintiffs' facilities	Case Organization, Planning and Strategy
7/25/2023	Travis Close	0.3	\$850	\$255	Email to team re: proposed revisions & strategy for draft RFPs, set 9	Discovery (Non-Deposition)
7/26/2023	Travis Close	0.3	\$850	\$255	Review and analyze edits by RLS to draft set 9 RFPs	Case Organization, Planning and Strategy
7/27/2023	Travis Close	0.3	\$850	\$255	Email to LEC re: updates about facility closures/openings	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/28/2023	Travis Close	0.3	\$850	\$255	Review and analyze final version of Plf's tenth set of RFPs before filing	Case Organization, Planning and Strategy
7/31/2023	Travis Close	1.4	\$850	\$1,190	Review and analyze emails pertaining to application of Fleet Safety Policy for contact information to potentially send notice info	Case Organization, Planning and Strategy
8/1/2023	Rachel Steyer	0.7	\$750	\$525	called Brookdale caller back, discussed case status, answered questions	Class Outreach and Contact
8/1/2023	Travis Close	1.4	\$850	\$1,190	Research adequacy requirements for class representatives under Rule 23(a)(4)	Case Organization, Planning and Strategy
8/3/2023	Guy Wallace	1.4	\$1,350	\$1,890	review and analysis of Ninth Circuit's opinion in Heredia v. Sunrise re class certification; com's with CJH; MTJ re preparation of renewed motion for class certification in Stiner v. Brookdale	Class Certification
8/3/2023	Travis Close	1.3	\$850	\$1,105	Research evidence of physical modifications to units as requested by residents at Fountaingrove and Scotts Valley facilities	Case Organization, Planning and Strategy
8/3/2023	Travis Close	0.7	\$850	\$595	Review and analyze policies for modifications to physical layout of units for residents with disabilities	Case Organization, Planning and Strategy
8/3/2023	Travis Close	0.2	\$850	\$170	Email to LEC re: question about current management at Fountaingrove facility	Case Organization, Planning and Strategy
8/4/2023	Guy Wallace	0.9	\$1,350	\$1,215	com's with CJH; MTJ re arguments re Ninth Circuit decision in Heredia and fact support re renewed motion for class certification re consumer fraud claims; analysis of same	Class Certification
8/4/2023	Travis Close	0.2	\$850	\$170	Review and analyze draft notice of decision in Heredia v. Sunrise for court's reference	Case Organization, Planning and Strategy
8/6/2023	Guy Wallace	1.2	\$1,350	\$1,620	review and analysis of Sunrise order from the Ninth Circuit; preparation of arguments re potential renewed motion for class certification	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/7/2023	Travis Close	0.9	\$850	\$765	Review and analyze recent facility evaluation and complaint investigation reports issued for San Ramon, Gardens of Tarzana, Santa Monica, Uptown Whittier, Irvine, Place of San Marcos, and San Jose facilities	Case Organization, Planning and Strategy
8/7/2023	Travis Close	1.4	\$850	\$1,190	Legal research re: whether unpublished appellate court decisions are persuasive or controlling authority for district courts	Case Organization, Planning and Strategy
8/7/2023	Travis Close	0.7	\$850	\$595	Legal research on authority of unpublished decisions	Case Organization, Planning and Strategy
8/8/2023	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re administrative motion to Judge Gilliam re pendings motions, class member contact information	Other Motions
8/8/2023	Guy Wallace	0.6	\$1,350	\$810	revise and edit draft admin motion re request for CMC; com's with MTJ re same	Other Motions
8/8/2023	Travis Close	0.8	\$850	\$680	Legal research re: federal rules of appellate procedure on Appeal citability of unpublished decisions	
8/8/2023	Travis Close	1.2	\$850	\$1,020	Research recent litigation activity in similar cases Bright v. Brookdale and Gonzaga v. Brookdale	Case Organization, Planning and Strategy
8/9/2023	Guy Wallace	0.7	\$1,350	\$945	review and analysis of proposed edits to request for CMC; com's with GG; MTJ re same; analysis of renewed motion for class certification re CLRA claims	Other Motions
8/9/2023	Rachel Steyer	0.3	\$750	\$225	reviewing and editing draft MTJ admin motion for CMC	Other Motions
8/9/2023	Travis Close	0.8	\$850	\$680	Review, analyze, and propose revisions for draft administrative motion for lift of discovery and orders on miscellaneous relief	Case Organization, Planning and Strategy
8/9/2023	Travis Close	1.9	\$850	\$1,615	Research & analyze effect of occupancy rates on average length of stay for residents, assisted living & memory care	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/10/2023	Guy Wallace	1.1	\$1,350	\$1,485	com's with GG; MTJ re draft motion re CMC; further motions to be filed and status of litigation	Case Management Conferences
8/10/2023	Mark Johnson	0.6	\$1,150	\$690	calls (x3) with GBW re strategy for renewed motion for class cert, facility-based classes for ADA claims, amending complaint, and follow up re mtg w/ Co-counsel re same.	Case Organization, Planning and Strategy
8/10/2023	Mark Johnson	0.5	\$1,150	\$575	zoom mtg w/ GBW, GCG re admin mtn for lifting stay, class list, CMC	Other Motions
8/10/2023	Mark Johnson	0.4	\$1,150	\$460	review and analyze proposed edits to admin mtn from GCG re listing stay, class list, CMC for zoom mtg	Other Motions
8/10/2023	Mark Johnson	0.3	\$1,150	\$345	review rule 7-11 and 7-12 and email exchange w/ OC re proposed motion and request for stipulation.	Other Motions
8/11/2023	Guy Wallace	0.5	\$1,350	\$675	review and analysis of administrative motion re further CMC; com's with GG; MTJ re same	Other Motions
8/11/2023	Mark Johnson	1.8	\$1,150	\$2,070	revise admin mtn for lifting stay, class list, CMC, draft proposed order and declaration in support of mtn, coms w/ co-counsel GCG re same; review all and finalize, coms w/ LEC re formatting, filing.	Other Motions
8/15/2023	Mark Johnson	0.6	\$1,150	\$690	review and analyze D opp to admin mtn re class list, stay and CMC; com w/ GBW (.1) re same	Other Motions
8/15/2023	Rachel Steyer	0.2	\$750	\$150	reviewing defendants' reply re admin motion	Other Motions
8/16/2023	Guy Wallace	1.3	\$1,350	\$1,755	com's with MTJ re Order from J. Gilliam setting CMC; proposed approach re trial date and further motions	Case Management Conferences
8/16/2023	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re CMC	Case Management Conferences
8/16/2023	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re CMC	Case Management Conferences

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/16/2023	Mark Johnson	1.5	\$1,150	\$1,725	multiple calls w/ GBW re order from court re CMC and trial date, impact of same, strategy for further prosecution of case including class cert motion renewal, summary judgment, trial strategy and time, possible 23f and appeal.	Case Organization, Planning and Strategy
8/16/2023	Mark Johnson	0.2	\$1,150	\$230	coms w/ R Steyer re analysis of access barriers for named plaintiff facilities.	Case Organization, Planning and Strategy
8/16/2023	Rachel Steyer	0.4	\$750	\$300	gathering experts barriers for MTJ	Misc. Research
8/18/2023	Guy Wallace	0.9	\$1,350	\$1,215	zoom with GG; JY; BBK; BU; MTJ re preparation for 8/24 CMC and discovery, motion practice, trial planning and schedule	Case Management Conferences
8/18/2023	Guy Wallace	0.5	\$1,350	\$675	com's with GG; MTJ re preparation for 8/24 CMC, results of co-counsel zoom	Case Management Conferences
8/18/2023	Guy Wallace	2.5	\$1,350	\$3,375	preparation of initial list of potential trial witnesses; estimates of necessary trial time for case involving 5 facilities and issues identified in Third Amended Complaint; com's with Cabalo; BU; MTJ re same	Case Management Conferences
8/18/2023	Mark Johnson	1.0	\$1,150	\$1,150	Zoom mtg w/ GBW, GCG, Umpierre, Yelin, Bien-Kahn re strategy of CMC, timing and length of trial, meeting and conferring w/ OC re same.	Case Management Conferences
8/18/2023	Mark Johnson	0.1	\$1,150	\$115	review email from GCG with proposed email to clerk re reporter. respond to same.	Case Organization, Planning and Strategy
8/18/2023	Mark Johnson	0.1	\$1,150	\$115	follow up call w/ GBW re zoom mtg w/ co-counsel, trial strategy and scope, discovery and meet and confer w/ OC	Case Organization, Planning and Strategy
8/18/2023	Rachel Steyer	1.9	\$750	\$1,425	reviewing and preparing/editing chart compiling barriers at named plaintiff facilities	Misc. Research

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/20/2023	Mark Johnson	3.1	\$1,150	\$3,565	Draft proposed email to opposing counsel re meeting and conferring about trial timing and length for CMC; research issues re discovery and motions and amending complaint for same.	Case Organization, Planning and Strategy
8/20/2023	Mark Johnson	0.3	\$1,150	\$345	calls x 2 w/ GBW re renewed motion for class certification and authorities iso same	Case Organization, Planning and Strategy
8/20/2023	Mark Johnson	0.3	\$1,150	\$345	review Hargrove v. Sleepy's LLC - case iso renewed mtn for class cert.	Class Certification
8/21/2023	Guy Wallace	3.7	\$1,350	\$4,995	review and analysis of proposals re motion practice, discovery, trial schedule and length; com's with GG; MTJ re same (.9)	Case Management Conferences
8/21/2023	Mark Johnson	0.4	\$1,150	\$460	review clerk's response re recording CMC, pull and review court's scheduling notices; email co-counsel re analysis of same and response	Case Management Conferences
8/21/2023	Mark Johnson	0.4	\$1,150	\$460	review and analyze proposed edits from G. Grunfeld to proposed email OC re CMC and trial timing and length; email coms re same.	Case Organization, Planning and Strategy
8/21/2023	Mark Johnson	0.5	\$1,150	\$575	call w/ GBW re G Grunfeld's proposed edits to meet and confer ltr, issues raised by same w/ respect to trial and parties' position.	Case Organization, Planning and Strategy
8/21/2023	Mark Johnson	0.4	\$1,150	\$460	revise meet and confer email to OC re meeting and conferring re CMC, incorporating G Grunfeld and GBW edits and send to OC	Case Organization, Planning and Strategy
8/21/2023	Mark Johnson	0.9	\$1,150	\$1,035	calls w/ GBW (x6) re scope of trial, witnesses, motions and other issues related to timing and length of trial for CMC planning	Case Organization, Planning and Strategy
8/21/2023	Mark Johnson	2.0	\$1,150	\$2,300	review and analysis of individual plaintiff history and history of complaints and amendments; prepare chart re same	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/21/2023	Mark Johnson	0.3	\$1,150	\$345	review Gonzalez case re standing for injunctive relief to be determined at time of filing complaint; com w/ GBW re same.	Case Organization, Planning and Strategy
8/21/2023	Mark Johnson	0.8	\$1,150	\$920	review sample of decs from D's happy campers and named Plaintiffs and RLS analysis of barriers in plaintiffs rooms inspected and documented by experts.	Case Organization, Planning and Strategy
8/21/2023	Mark Johnson	0.3	\$1,150	\$345	coms w/ Rachel re decs and other documents with evidence iso named Plaintiffs' claims, including barriers.	Trial and Pretrial Preparation
8/21/2023	Rachel Steyer	1.2	\$750	\$900	reviewing and gathering named plaintiff facility declarations for GBW	Case Management Conferences
8/21/2023	Rachel Steyer	1.2	\$750	\$900	reviewing named plaintiff files to determine and confirm unit numbers, cross referencing with access expert reports tabulating barriers	Misc. Research
8/21/2023	Rachel Steyer	0.3	\$750	\$225	email to MTJ summarizing findings of access barrier reports vis a vis named plaintiff units	Misc. Research
8/22/2023	Guy Wallace	1.2	\$1,350	\$1,620	preparation for 8/24 CMC; review and analysis of TCC memo re remaining discovery, analysis of scope of access barriers at issue re injunctive relief and damages	Case Management Conferences
8/22/2023	Guy Wallace	0.5	\$1,350	\$675	prepare for meet confer with Defendant re case schedule; com's with MTJ re same	Case Management Conferences
8/22/2023	Guy Wallace	0.4	\$1,350	\$540	zoom with Rutner; Defendant's counsel; GG; MTJ re case schedule and 8/24 CMC	Case Management Conferences
8/22/2023	Guy Wallace	0.6	\$1,350	\$810	preparation for CMC set for 8/24; Oliver v. Ralph's Grocery; Evenflo; Sunrise	Case Management Conferences
8/22/2023	Guy Wallace	0.3	\$1,350	\$405	com's with GG; MTJ re results of meet and confer with Defendant's counsel re 8/24 CMC	Case Management Conferences
8/22/2023	Guy Wallace	0.6	\$1,350	\$810	review and analysis of Plaintiffs' renewed motion re class certification; com's with MTJ re same	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/22/2023	Mark Johnson	0.5	\$1,150	\$575	zoom meet and confer w/ Ruttner, Jacobson, Bertinio, Grunfeld, Wallace re trial timing and length, per direction from court.	Case Management Conferences
8/22/2023	Mark Johnson	0.3	\$1,150	\$345	follow-up call with Wallace and Grunfeld re meet and confer w/ OC on timing and length of trial, amending complaint, motion practice. discovery.	Case Organization, Planning and Strategy
8/22/2023	Rachel Steyer	1.4	\$750	\$1,050	reviewing named plaintiff facility access expert reports and compiling chart analyzing common area barriers	Case Management Conferences
8/23/2023	Guy Wallace	4.1	\$1,350	\$5,535	preparation of notes re remaining discovery (fact and expert); overview of Plaintiffs' remaining claims; proposed motions; proposed schedule and trial date and estimated trial length	Case Management Conferences
8/23/2023	Mark Johnson	0.4	\$1,150	\$460	call with client Stacia Stiner re recent developments, staffing, dining issues, fire drill	Case Organization, Planning and Strategy
8/23/2023	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW re trial planning, CMC, motions	Case Organization, Planning and Strategy
8/23/2023	Mark Johnson	0.4	\$1,150	\$460	further calls w/ GBW (x4) re trial, CMC, motions, motion deadline	Case Organization, Planning and Strategy
8/23/2023	Rachel Steyer	0.5	\$750	\$375	preparing updated/revised charts per MTJ instructions concerning named plaintiff facilities and access barriers	Case Management Conferences
8/23/2023	Rachel Steyer	0.3	\$750	\$225	reviewing Schroyer declaration to review for specific info for GBW	Case Management Conferences
8/23/2023	Rachel Steyer	0.2	\$750	\$150	reviewing Schroyer declaration for GBW	Case Management Conferences
8/23/2023	Rachel Steyer	0.2	\$750	\$150	further review of Schroyer declaration for GBW, transmitting email	Case Management Conferences
8/23/2023	Rachel Steyer	0.3	\$750	\$225	reviewing Schroyer reply declaration	Case Management Conferences

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/24/2023	Guy Wallace	4.2	\$1,350	\$5,670	preparation for CMC, including trial length estimate and overview of claims to be presented at trial and nature of relief sought on behalf of transportation class and named plaintiffs, trial date, proposed case schedule through trial, analysis of remaining discovery, Plaintiffs' remaining proposed motion practice	Case Management Conferences
8/24/2023	Guy Wallace	1.7	\$1,350	\$2,295	prepare for and attend CMC set for 8/24	Case Management Conferences
8/24/2023	Guy Wallace	1.3	\$1,350	\$1,755	review and analysis of results of CMC; com's with GG; MTJ; JAU; RLS re same	Case Management Conferences
8/24/2023	Mark Johnson	1.0	\$1,150	\$1,150	appear for further case management conference re trial scheduling, discovery, motions	Case Management Conferences
8/24/2023	Mark Johnson	1.5	\$1,150	\$1,725	prep for CMC, including collection, printing and review of prior orders, CMC statements, administrative motions and email communications w/ OC	Case Management Conferences
8/24/2023	Mark Johnson	0.7	\$1,150	\$805	follow up conference w/ GBW, GCG re rulings at CMC and next steps, strategy and conference w/ GBW, RLS re tasks for discovery and motions	Case Organization, Planning and Strategy
8/24/2023	Mark Johnson	0.9	\$1,150	\$1,035	calls with G Wallace re prep for CMC, discovery issue re 9th set of doc request, trial schedule proposal, debriefing from CMC, next steps and scope of trial	Case Organization, Planning and Strategy
8/24/2023	Mark Johnson	1.4	\$1,150	\$1,610	review D's counsel email re 9th set of doc request; review and do comparative analysis of 9th and 10th set of rogs; draft proposed response and com w/ COV re same.	Discovery (Non-Deposition)
8/24/2023	Mark Johnson	0.3	\$1,150	\$345	draft email response to OC re 9th and 10th set of doc requests; review and draft response to further inquiry.	Discovery (Non-Deposition)
8/24/2023	Rachel Steyer	0.5	\$750	\$375	post CMC discussions with MTJ, GBW, and GCG from RBGG	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/25/2023	Guy Wallace	0.8	\$1,350	\$1,080	com's with BU;MTJ re renewed motion for class certification and J. Gilliam's comments re same at CMC; analysis of same and schedule re same	Class Certification
8/25/2023	Guy Wallace	0.6	\$1,350	\$810	com's with BU; JAU re potential mootness issues re named plaintiffs who are deceased and whether estate can pursue claims for damages and injunctive relief; potential certification of ADA subclasses	Misc. Research
8/25/2023	Mark Johnson	0.8	\$1,150	\$920	research re punitive damages.	Case Organization, Planning and Strategy
8/25/2023	Rachel Steyer	4.8	\$750	\$3,600	reviewing Nevarez Exhibit A chart and preparing Brookdale barrier chart accordingly	Other Motions
8/25/2023	Travis Close	0.3	\$850	\$255	Email to GBW re: memo on status of transportation class discovery	Case Organization, Planning and Strategy
8/25/2023	Travis Close	0.4	\$850	\$340	Review and analyze administrative motion to lift pause on discovery for CMC	Case Organization, Planning and Strategy
8/25/2023	Travis Close	2.4	\$850	\$2,040	Draft report analyzing status of facility inspections at 5-named plaintiff facilities	Case Organization, Planning and Strategy
8/25/2023	Travis Close	0.9	\$850	\$765	Review and analyze recent facility evaluation and complaint investigation reports issued for San Ramon, Auburn, Mirage Inn, Sylvan Ranch, Folsom, San Marcos, Tracy, and Paulin Creek facilities	Case Organization, Planning and Strategy
8/27/2023	Jennifer Bybee	2.1	\$925	\$1,943	Research mootness of named plaintiffs claim upon death	Class Certification
8/28/2023	Guy Wallace	0.8	\$1,350	\$1,080	analysis of schedule on filing Plaintiffs' motions in light of J. Gilliam's comments at the 8/24 CMC; com's with BU; MTJ; JAU re same	Case Organization, Planning and Strategy
8/28/2023	Guy Wallace	1.2	\$1,350	\$1,620	legal research and analysis re mootness and ADA claims of Plaintiffs who are deceased; com's with JAU re same	Misc. Research

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/28/2023	Jennifer Bybee	2.3	\$925	\$2,128	Research whether named estate can recover injunctive relief on behalf of deceased named plaintiff	Class Certification
8/28/2023	Jennifer Bybee	1.2	\$925	\$1,110	Draft email containing research findings re mootness for GBW	Class Certification
8/28/2023	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re research and class certification	Class Certification
8/28/2023	Mark Johnson	0.1	\$1,150	\$115	com w/ GBW re punitive damages research	Case Organization, Planning and Strategy
8/28/2023	Mark Johnson	3.5	\$1,150	\$4,025	research re punitive damages; work on memo re same	Misc. Research
8/28/2023	Mark Johnson	0.1	\$1,150	\$115	review and respond to GBW email re scheduling proposal for 3 motions	Other Motions
8/28/2023	Rachel Steyer	4.1	\$750	\$3,075	ongoing preparation of barriers spreadsheet	Trial and Pretrial Preparation
8/28/2023	Travis Close	2.3	\$850	\$1,955	Draft analysis of scope of facility inspections covering facility transportation of residents	Case Organization, Planning and Strategy
8/29/2023	Mark Johnson	1.0	\$1,150	\$1,150	research prior discovery letter briefs, rulings and meet and confer correspondence to identify outstanding issues; draft email to OC re discovery meet and confer.	Discovery (Non-Deposition)
8/29/2023	Rachel Steyer	0.2	\$750	\$150	reviewing email and letter to OC distributed by MTJ concerning outstanding discovery items	Discovery (Non-Deposition)
8/29/2023	Travis Close	0.6	\$850	\$510	Review and analyze recent facility evaluation and complaint investigation reports issued for Oceanhouse, Irvine, Brookhurst, Auburn, Corona, and Scotts Valley facilities	Case Organization, Planning and Strategy
8/29/2023	Travis Close	1.6	\$850	\$1,360	Analyze pending discovery letters & requests to determine items for following up that are within the scope of named plaintiffs & certified classes	Discovery (Non-Deposition)
8/30/2023	Guy Wallace	0.9	\$1,350	\$1,215	prepare for and participate in meet and confer with Rutner; Bertino; Jacobsen; MTJ; BBK re schedule; discovery issues	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/30/2023	Rachel Steyer	0.4	\$750	\$300	preparing email for GBW, MTJ, and RBGG co-counsel providing dates of named plaintiffs' residencies at Brookdale facilities	Misc. Research
8/30/2023	Rachel Steyer	0.3	\$750	\$225	reviewing proposed order and motion to seal circulated by OC	Other Motions
8/30/2023	Travis Close	0.3	\$850	\$255	Email to team re: notes for tomorrow's Meet and confer call with Defendants	Case Organization, Planning and Strategy
8/30/2023	Travis Close	1.4	\$850	\$1,190	Legal research on temporal scope of discovery in individual actions	Case Organization, Planning and Strategy
8/31/2023	Guy Wallace	0.5	\$1,350	\$675	revise and edit draft stipulation and order re pretrial and trial schedule; com's with GG; MTJ re same	Case Management Conferences
8/31/2023	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ; RLS re preparation of 4AC and attached list of barriers	Pleadings and Motions Re: Pleadings
8/31/2023	Mark Johnson	0.4	\$1,150	\$460	email and phone communications w/ opposing counsel and co-counsel re form of stip re scheduling, revisions to same	Other Motions
8/31/2023	Mark Johnson	0.4	\$1,150	\$460	conference w/ R Steyer and G Wallace re barrier list for named plaintiff facilities for attachment to amended complaint	Pleadings and Motions Re: Pleadings
8/31/2023	Travis Close	0.3	\$850	\$255	Review and analyze additions & edits by BBK on Omnibus sealing motion	Case Organization, Planning and Strategy
8/31/2023	Travis Close	0.8	\$850	\$680	Research state regulations for documenting & updating resident ambulatory status; compare to Brookdale's Resident Evacuation Ability policy to determine whether policy should be sealed	Case Organization, Planning and Strategy
8/31/2023	Travis Close	1.3	\$850	\$1,105	Legal research on discretion of trial judge to overrule previous findings about whether good/compelling causes exist to seal evidence	Case Organization, Planning and Strategy
8/31/2023	Travis Close	0.2	\$850	\$170	Review and analyze draft stipulation and proposed order re: case schedule	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/31/2023	Travis Close	0.3	\$850	\$255	Review and analyze draft omnibus motion to seal & proposed order by Defendants	Other Motions
9/1/2023	Rachel Steyer	0.2	\$750	\$150	response to declarant concerning case status update	Class Outreach and Contact
9/1/2023	Rachel Steyer	0.6	\$750	\$450	reviewing Oliver case for instruction as to preparing barrier chart	Misc. Research
9/1/2023	Rachel Steyer	0.2	\$750	\$150	reviewing defendants sponsoring declaration for sealing motion	Other Motions
9/1/2023	Rachel Steyer	3.6	\$750	\$2,700	reviewing and completing chart tracking barriers for amended complaint	Other Motions
9/1/2023	Travis Close	1.2	\$850	\$1,020	Legal research on standard of review for motion for consideration	Case Organization, Planning and Strategy
9/1/2023	Travis Close	0.8	\$850	\$680	Investigate claims for long pendant wait times at Brookhurst facility based on data received & recent complaint investigation reports	Case Organization, Planning and Strategy
9/5/2023	Guy Wallace	1.4	\$1,350	\$1,890	legal research and analysis re Ninth Circuit and Northern District case law re renewed motions for class certification and applicability of standard re reconsideration; analysis of reconsideration standard	Class Certification
9/5/2023	Guy Wallace	0.7	\$1,350	\$945	review and analysis of draft barrier appendix from RLS; com's with RLS re same	Pleadings and Motions Re: Pleadings
9/5/2023	Rachel Steyer	0.2	\$750	\$150	email to MTJ and GBW with draft letter for review, incorporating and saving MTJ edits and proofreading	Class Outreach and Contact
9/5/2023	Rachel Steyer	0.2	\$750	\$150	response to GBW concerning declarants at Brookdale Tracy	Misc. Research
9/5/2023	Rachel Steyer	0.4	\$750	\$300	preparing response to GBW concerning status of declarants at named plaintiff facilities	Misc. Research
9/5/2023	Travis Close	0.8	\$850	\$680	Review and analyze filings associated with motion to certify class in related case, Megan Bright v. Brookdale Senior Living (FL/NC)	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/5/2023	Travis Close	0.7	\$850	\$595	Review and analyze recent facility evaluation and complaint investigation reports issued for Monrovia, Central Whittier, Ocean House, Kettleman Lane, Redwood City, Scotts Valley, and Chanate facilities	Case Organization, Planning and Strategy
9/6/2023	Travis Close	0.3	\$850	\$255	Review and analyze draft letter to class members previously contacted, providing update & notice of SOL	Class Outreach and Contact
9/6/2023	Travis Close	1.3	\$850	\$1,105	Legal research on ethical rules regarding notifying class of pending claims and statute of limitation	Class Outreach and Contact
9/7/2023	Travis Close	0.8	\$850	\$680	Review and analyze parties' admin motion to file under seal & Exhs. 1-12 for accuracy	Case Organization, Planning and Strategy
9/8/2023	Guy Wallace	0.8	\$1,350	\$1,080	zoom with JY; BBK; AX; KS; BU; MTJ; TCC; RLS re further motions, discovery, tasks and schedule	Case Organization, Planning and Strategy
9/8/2023	Guy Wallace	0.7	\$1,350	\$945	analysis of further discovery needs and motions; com's with MTJ; RLS re same	Discovery (Non-Deposition)
9/8/2023	Mark Johnson	0.3	\$1,150	\$345	pre-call with GBW re motion and trial planning for team zoom call with COC	Case Organization, Planning and Strategy
9/8/2023	Mark Johnson	1.0	\$1,150	\$1,150	zoom call with Co-counsel AX, JY, GBW, BBK, TCC, RLS, BU, KS re remaining discovery, trial planning, renewed class cert motion, summary judgment motion, site inspections	Trial and Pretrial Preparation
9/8/2023	Rachel Steyer	1.1	\$750	\$825	meeting with GBW, TCC, MTJ and RBGG co-counsel to review and discuss tasks and assignments	Case Organization, Planning and Strategy
9/8/2023	Rachel Steyer	0.2	\$750	\$150	reviewing data/numbers in class lists	Class Outreach and Contact
9/8/2023	Travis Close	0.8	\$850	\$680	Prep for today's meeting to discuss next steps for discovery & trial schedule (review and analyze previous discovery deficiency memos and meet and confer letters re: discovery; review doc analysis memos)	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/8/2023	Travis Close	1.2	\$850	\$1,020	Review and analyze latest privilege log & notes for items worth challenging to get unsealed	Case Organization, Planning and Strategy
9/8/2023	Travis Close	1.5	\$850	\$1,275	Draft notes for items worth pursuing regarding non-class claims at named plaintiff facilities	Case Organization, Planning and Strategy
9/8/2023	Travis Close	1.1	\$850	\$935	Meeting with team & co-counsel to discuss further strategy re PSJ, renewed motion for class cert, trial schedule, etc	Case Organization, Planning and Strategy
9/8/2023	Travis Close	0.9	\$850	\$765	Analysis of priority discovery action items to determine coverage in recent RFP requests 9 & 10	Discovery (Non-Deposition)
9/9/2023	Rachel Steyer	0.3	\$750	\$225	call with former class member declarant to provide case status update	Class Outreach and Contact
9/11/2023	Guy Wallace	3.8	\$1,350	\$5,130	preparation and drafting of initial outline of renewed motion for class certification; legal research and analysis re applicable standards, subclassing, duty of district court to certify narrower class	Class Certification
9/11/2023	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re Olean follow up research	Class Certification
9/11/2023	Mark Johnson	0.1	\$1,150	\$115	call w/ G Wallace re renewed class certification mtn on fraud claims and possibly narrowing damages / class definition to move-in fees.	Class Certification
9/11/2023	Rachel Steyer	0.2	\$750	\$150	reviewing stipulation and protective order	Class Outreach and Contact
9/11/2023	Travis Close	0.8	\$850	\$680	Review and analyze stipulations on production of resident class lists & on discovery of confidential information to confirm eligibility for further class communications	Class Outreach and Contact
9/12/2023	Jennifer Bybee	0.8	\$925	\$740	Review CMC transcript	Case Management Conferences
9/12/2023	Jennifer Bybee	1.0	\$925	\$925	Review class cert order	Class Certification
9/12/2023	Jennifer Bybee	1.0	\$925	\$925	Review assignment and shepardize Olean to see what has been said on narrowing class definitions since then	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/12/2023	Travis Close	2.1	\$850	\$1,785	Research prior trial plans for physical access class actions & organization of barrier types	Case Organization, Planning and Strategy
9/13/2023	Jennifer Bybee	0.8	\$925	\$740	Shepardize Olean and Messner and review results	Appeal
9/13/2023	Mark Johnson	0.2	\$1,150	\$230	conference w/ G Wallace re framing / scope of renewed motion for class cert	Class Certification
9/13/2023	Travis Close	1.7	\$850	\$1,445	Analysis of records regarding elopement drills & procedures for finding missing residents (Brookdale Brea incident)	Case Organization, Planning and Strategy
9/13/2023	Travis Close	0.3	\$850	\$255	Email to team re: elopement incident at Brookdale Brea & followup	Case Organization, Planning and Strategy
9/13/2023	Travis Close	0.7	\$850	\$595	Review and analyze recent complaint investigation reports and facility evaluation reports issued for Ocean House, Valley View, Brea, Roseville, Auburn, North Euclid facilities	Discovery (Non-Deposition)
9/14/2023	Guy Wallace	1.8	\$1,350	\$2,430	preparation of outline of arguments and points re renewed motion for class certification	Class Certification
9/14/2023	Jennifer Bybee	1.5	\$925	\$1,388	Shepardize headnote in Messener re narrowing class definition; review circuit cases on same	Misc. Research
9/14/2023	Jennifer Bybee	2.0	\$925	\$1,850	Research whether overinclusive class can be narrowed instead of denying class cert	Misc. Research
9/15/2023	Guy Wallace	3.3	\$1,350	\$4,455	preparation of renewed motion for certification and outline re same; legal research and analysis re same	Class Certification
9/15/2023	Jennifer Bybee	3.0	\$925	\$2,775	Research whether district court should redefine class rather than decertify	Misc. Research
9/15/2023	Rachel Steyer	0.2	\$750	\$150	call with declarant to provide case status update	Class Outreach and Contact
9/15/2023	Rachel Steyer	0.3	\$750	\$225	call with TRB to review class lists and arbitration analysis	Class Outreach and Contact
9/15/2023	Rachel Steyer	1.1	\$750	\$825	drafting discovery research memo	Misc. Research

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/15/2023	Travis Close	2.2	\$850	\$1,870	Review and analyze resident complaints received in ESI from named plaintiff facilities to determine extent of required supplementation	Case Organization, Planning and Strategy
9/15/2023	Travis Close	1.9	\$850	\$1,615	Analysis of inspections at named plaintiff facilities to determine rooms & common areas not covered -- Fountaingrove, Scotts Valley, Hemet	Discovery (Non-Deposition)
9/15/2023	Travis Close	1.8	\$850	\$1,530	Analysis of inspections at named plaintiff facilities to determine rooms & common areas not covered -- Brookhurst, Tracy, San Ramon	Discovery (Non-Deposition)
9/17/2023	Guy Wallace	2.1	\$1,350	\$2,835	preparation and drafting of outline of renewed motion re class certification	Class Certification
9/18/2023	Guy Wallace	0.7	\$1,350	\$945	review and analysis of evidence to support renewed motion for class certification	Class Certification
9/18/2023	Guy Wallace	0.5	\$1,350	\$675	review and analysis of draft barriers list re 4AC	Pleadings and Motions Re: Pleadings
9/18/2023	Jennifer Bybee	4.1	\$925	\$3,793	Research whether court should narrow class definition rather than decline to certify class	Misc. Research
9/18/2023	Rachel Steyer	4.2	\$750	\$3,150	preparing and drafting Jeanette Algarme depo summary	Depositions
9/18/2023	Rachel Steyer	1.8	\$750	\$1,350	working on Ralph Carlson depo summary	Depositions
9/18/2023	Rachel Steyer	0.2	\$750	\$150	reviewing earlier Rule 34 stipulation and order/notice of site inspections	Discovery (Non-Deposition)
9/18/2023	Travis Close	0.8	\$850	\$680	Analysis of prior inspections to determine rooms made available for inspection at Scotts Valley, Fountaingrove facilities	Case Organization, Planning and Strategy
9/18/2023	Travis Close	0.9	\$850	\$765	Analysis of prior inspections to determine rooms made available for inspection at Tracy, Brookhurst facilities	Case Organization, Planning and Strategy
9/18/2023	Travis Close	0.3	\$850	\$255	Email to MTJ re: instructions for drafting rule 34 site inspections	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/18/2023	Travis Close	0.3	\$850	\$255	Email to BBK (co-counsel) re: allocation of responsibility for resumed inspections	Case Organization, Planning and Strategy
9/18/2023	Travis Close	2.3	\$850	\$1,955	Draft rule 34 site inspection for Fountaingrove, Scotts valley, Tracy, and Brookhurst facilities	Discovery (Non-Deposition)
9/19/2023	Guy Wallace	2.1	\$1,350	\$2,835	preparation and drafting of outline of renewed motion for class certification	Class Certification
9/19/2023	Guy Wallace	0.5	\$1,350	\$675	legal research and analysis re Title III regulations, ADAAG and requirements for fixed or as-built elements	Misc. Research
9/19/2023	Guy Wallace	3.7	\$1,350	\$4,995	review and analysis of list of barriers re 4AC; com's with Waters; MTJ; RLS re same	Pleadings and Motions Re: Pleadings
9/19/2023	Guy Wallace	0.8	\$1,350	\$1,080	further review and analysis of barriers list for the 6 facilities re removal of potential barriers and categories of barriers	Pleadings and Motions Re: Pleadings
9/19/2023	Guy Wallace	0.6	\$1,350	\$810	legal research and analysis re case law re "fixed" or "built-in" barriers; com's with RLS re same	Pleadings and Motions Re: Pleadings
9/19/2023	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of access barriers re Hemet facility; preparation of list of issues to be considered in evaluating list of barriers appended to 4AC	Pleadings and Motions Re: Pleadings
9/19/2023	Jennifer Bybee	3.1	\$925	\$2,868	Research whether court must consider subclasses in lieu of denying class certification	Class Certification
9/19/2023	Jennifer Bybee	0.1	\$925	\$93	Review email from GBW re barrier list for 6 facilities	Class Certification
9/19/2023	Jennifer Bybee	0.2	\$925	\$185	Call with GBW re barriers at 6 facilities	Class Certification
9/19/2023	Jennifer Bybee	0.4	\$925	\$370	Edit research notes on narrowing class definition	Class Certification
9/19/2023	Jennifer Bybee	0.8	\$925	\$740	Review and propose edits to named plaintiff barrier spreadsheet	Class Certification
9/19/2023	Rachel Steyer	0.9	\$750	\$675	looking into/for interpretive guidelines requested by GBW for ADA title III definitions	Misc. Research
9/19/2023	Rachel Steyer	0.2	\$750	\$150	call with GBW to review research pertaining to fixed v. built in	Misc. Research

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/19/2023	Rachel Steyer	2.7	\$750	\$2,025	research into subsection of ADA concerning fixed vs. non-fixed structures	Misc. Research
9/19/2023	Travis Close	0.3	\$850	\$255	Email to team re: draft notice of inspections & strategy	Case Organization, Planning and Strategy
9/19/2023	Travis Close	0.8	\$850	\$680	Review and analyze notes from Stiner's experience at San Ramon during covid, to inform planned areas of inspection	Case Organization, Planning and Strategy
9/19/2023	Travis Close	0.5	\$850	\$425	Review and analyze recent facility evaluation and complaint investigation reports issued at Ocean House, Irvine, San Marcos, and Chanate facilities	Case Organization, Planning and Strategy
9/19/2023	Travis Close	0.9	\$850	\$765	Analysis of low-vision barriers found at Tracy facility inspection	Case Organization, Planning and Strategy
9/19/2023	Travis Close	0.8	\$850	\$680	Analysis of previous notes & correspondence with experts re: dimensional tolerances to determine potential issues for PSJ	Case Organization, Planning and Strategy
9/19/2023	Travis Close	0.6	\$850	\$510	Revisions to draft notice of inspection, including incorporation of pltf's living units from notes	Discovery (Non-Deposition)
9/19/2023	Travis Close	0.2	\$850	\$170	Email to MTJ re: additions to notice of inspection, incorporation of stiner's covid stay	Discovery (Non-Deposition)
9/19/2023	Travis Close	1.6	\$850	\$1,360	Legal research on rule 34 inspections at facilities no longer operated by defendants	Discovery (Non-Deposition)
9/19/2023	Travis Close	1.6	\$850	\$1,360	Analysis of plaintiffs' resident assessment data to determine which plaintiffs have standing to challenge vision barriers	Discovery (Non-Deposition)
9/20/2023	Guy Wallace	2.8	\$1,350	\$3,780	preparation of outline of renewed motion for class certification	Class Certification
9/20/2023	Guy Wallace	0.6	\$1,350	\$810	com's with BU; MTJ; RLS re preparation of renewed motion for class certification	Class Certification
9/20/2023	Guy Wallace	0.7	\$1,350	\$945	analysis of potential claim re elder financial abuse; com's with MTJ; BU re same	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/20/2023	Guy Wallace	1.4	\$1,350	\$1,890	preparation and drafting of renewed motion for class certification	Class Certification
9/20/2023	Jennifer Bybee	0.4	\$925	\$370	Review and edit notes on research re subclasses	Class Certification
9/20/2023	Rachel Steyer	0.2	\$750	\$150	reviewing older emails to identify number of declarants who paid community fee	Class Outreach and Contact
9/20/2023	Rachel Steyer	0.2	\$750	\$150	reviewing declarations from six facilities and identifying who did / did not pay community fees	Class Outreach and Contact
9/20/2023	Rachel Steyer	1.1	\$750	\$825	review of declarations for community fee	Class Outreach and Contact
9/20/2023	Rachel Steyer	4.2	\$750	\$3,150	legal research into fixed vs. non fixed barriers	Misc. Research
9/20/2023	Rachel Steyer	0.2	\$750	\$150	searching older emails to locate number of declarants who paid community fee and transmitting info to GBW	Misc. Research
9/20/2023	Travis Close	0.3	\$850	\$255	Email to BBK re: coordination regarding resumed inspections	Case Organization, Planning and Strategy
9/20/2023	Travis Close	1.8	\$850	\$1,530	Legal research regarding whether tables, chairs, benches, recliners, and other furniture are "built in" for purposes of ADA coverage	Case Organization, Planning and Strategy
9/20/2023	Travis Close	0.4	\$850	\$340	Email to team re: analysis of current case law regarding applicability of ADA to non-fixed furniture	Case Organization, Planning and Strategy
9/20/2023	Travis Close	0.3	\$850	\$255	Review and analyze proposed letter to plaintiffs re: update on case	Case Organization, Planning and Strategy
9/20/2023	Travis Close	0.4	\$850	\$340	Analysis of dimensional tolerance consistency at Tracy facility barriers	Discovery (Non-Deposition)
9/20/2023	Travis Close	0.5	\$850	\$425	Analyze dimensional tolerance consistency at Brookhurst facility barriers	Discovery (Non-Deposition)
9/20/2023	Travis Close	1.6	\$850	\$1,360	Review and analyze personal assessment data for named plaintiffs to identify evidence for mobility disabilities	Discovery (Non-Deposition)
9/21/2023	Guy Wallace	1.4	\$1,350	\$1,890	review and analysis of barriers identified in Hemet facility	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/21/2023	Guy Wallace	0.3	\$1,350	\$405	com's with RLS re preparation of declaration re renewed MCC	Class Certification
9/21/2023	Guy Wallace	0.9	\$1,350	\$1,215	com's with CJH; BU; MTJ re renewed MCC and narrowed classes and supporting evidence re same	Class Certification
9/21/2023	Guy Wallace	2.1	\$1,350	\$2,835	preparation and drafting of outline re renewed MCC; com's with MTJ re same	Class Certification
9/21/2023	Guy Wallace	0.8	\$1,350	\$1,080	legal research and analysis re Unruh Act and intentionality requirement; com's with BBK; Waters re barriers that are readily achievable under the ADA	Motion for Summary Judgment / Adjudication
9/21/2023	Jennifer Bybee	0.5	\$925	\$463	Finalize subclass research summary and email same to GBW	Class Certification
9/21/2023	Jennifer Bybee	2.1	\$925	\$1,943	Review Named Plaintiff Barriers Spreadsheet and suggest edits to same	Class Certification
9/21/2023	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re research and barrier list	Class Certification
9/21/2023	Mark Johnson	1.1	\$1,150	\$1,265	calls w/ G Wallace re plan for and elements of renewed class certification mtn; declarations for same and assignments.	Case / Document Administration
9/21/2023	Mark Johnson	0.3	\$1,150	\$345	calls and emails w/ R Bonner, G Wallace and J Proctor re review of docs for renewed class cert motion concerning tracking of move in and other initial fees collected by Brookdale.	Class Certification
9/21/2023	Rachel Steyer	0.2	\$750	\$150	reviewing MTJ draft letter to named plaintiffs	Class Outreach and Contact
9/21/2023	Rachel Steyer	0.2	\$750	\$150	call with GBW to review and discuss access expert barrier reports	Experts (Including Retention)
9/21/2023	Travis Close	0.3	\$850	\$255	Email to BBK re: draft rule 34 notice and inspection logistics	Case Organization, Planning and Strategy
9/21/2023	Travis Close	0.3	\$850	\$255	Review, analyze, and propose revisions for draft letter to stacia stiner re: updates about the case and trial schedule	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/21/2023	Travis Close	0.5	\$850	\$425	Analyze consistency of dimensional tolerances applied at San Ramon facility	Discovery (Non-Deposition)
9/21/2023	Travis Close	0.4	\$850	\$340	Analyze consistency of dimensional tolerances applied at Fountaingrove facility	Discovery (Non-Deposition)
9/21/2023	Travis Close	0.4	\$850	\$340	Further revisions to draft Rule 34 notice of inspection	Discovery (Non-Deposition)
9/22/2023	Guy Wallace	1.6	\$1,350	\$2,160	prepare for and participate in zoom with GG; BBK; AX; KS; BU; MTJ; TCC; RLS re preparation of renewed motion for class certification; preparation of Fourth Amended Complaint; preparation of motion for partial summary judgment; discovery	Case Organization, Planning and Strategy
9/22/2023	Guy Wallace	1.7	\$1,350	\$2,295	preparation and drafting of renewed motion for class certification	Class Certification
9/22/2023	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re preparation of renewed MCC	Class Certification
9/22/2023	Guy Wallace	0.3	\$1,350	\$405	com's with RLS re preparation of renewed MCC	Class Certification
9/22/2023	Guy Wallace	3.3	\$1,350	\$4,455	preparation and drafting of renewed MCC	Class Certification
9/22/2023	Jennifer Bybee	2.2	\$925	\$2,035	Review and edit barrier list	Class Certification
9/22/2023	Mark Johnson	1.2	\$1,150	\$1,380	zoom mtg w/ Wallace, Grunfeld, Xu, Bien-Kahn, Steyer, Umpierre, Close, Stilber re planning for renewed class cert motion, discovery, trial prep, summary judgment mtn, site inspections, etc.	Case Organization, Planning and Strategy
9/22/2023	Mark Johnson	0.5	\$1,150	\$575	review GCG notes of Brookhurst inspection; email to GBW re same	Case Organization, Planning and Strategy
9/22/2023	Mark Johnson	0.7	\$1,150	\$805	review and make proposed edits to outline for renewed mtn for class cert	Class Certification
9/22/2023	Mark Johnson	0.4	\$1,150	\$460	telephone coms w/ G Wallace re strategy on renewed class cert mtn	Class Certification
9/22/2023	Mark Johnson	4.0	\$1,150	\$4,600	continue review of prior Mastin declaration and work on declaration iso renewed mtn	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/22/2023	Mark Johnson	0.4	\$1,150	\$460	finalize ltr to R Stiner and S Stiner; coms w/ LEC re same; draft email cover to RS re same and text to SS re same; text exchange w/ SS	Trial and Pretrial Preparation
9/22/2023	Rachel Steyer	1.1	\$750	\$825	additional work on named plaintiff depo summaries	Depositions
9/22/2023	Rachel Steyer	0.3	\$750	\$225	reviewing email from RBGG with prior notes from access expert site inspection	Experts (Including Retention)
9/22/2023	Rachel Steyer	0.2	\$750	\$150	call with GBW to review and discuss draft declaration and tables	Other Motions
9/22/2023	Travis Close	0.3	\$850	\$255	Research time deadlines for response to notice of inspections	Case Organization, Planning and Strategy
9/22/2023	Travis Close	0.3	\$850	\$255	Revisions to draft rule 34 notice re: scope of units for inspection	Discovery (Non-Deposition)
9/22/2023	Travis Close	0.9	\$850	\$765	Review and analyze evidence of plaintiffs with low vision at San Ramon facility, to determine whether we may allege these barriers	Pleadings and Motions Re: Pleadings
9/22/2023	Travis Close	0.8	\$850	\$680	Review and analyze evidence of plaintiffs with low vision at Brookhurst facility, to determine whether we may allege these barriers	Pleadings and Motions Re: Pleadings
9/22/2023	Travis Close	0.5	\$850	\$425	Review and analyze proposed barriers to include at Brookhurst facility to determine which to eliminate in front of jury	Pleadings and Motions Re: Pleadings
9/22/2023	Travis Close	0.6	\$850	\$510	Review and analyze proposed barriers to include at Tracy facility to determine which to eliminate in front of jury	Pleadings and Motions Re: Pleadings
9/22/2023	Travis Close	0.4	\$850	\$340	Review and analyze proposed barriers to include at Hemet facility to determine which to eliminate in front of jury	Pleadings and Motions Re: Pleadings
9/22/2023	Travis Close	0.5	\$850	\$425	Review and analyze proposed barriers to include at San Ramon facility to determine which to eliminate in front of jury	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/22/2023	Travis Close	0.4	\$850	\$340	Review and analyze proposed barriers to include at Fountaingrove facility to determine which to eliminate in front of jury	Pleadings and Motions Re: Pleadings
9/22/2023	Travis Close	1.3	\$850	\$1,105	Legal research on staleness of evidence & length of time after inspection for admissibility	Pleadings and Motions Re: Pleadings
9/22/2023	Travis Close	1.1	\$850	\$935	Meeting with GBW, MTJ, RLS & co-counsel re: amendments to complaint, renewed class cert motion, inspections	Pleadings and Motions Re: Pleadings
9/23/2023	Guy Wallace	3.6	\$1,350	\$4,860	preparation of detailed outline of renewed motion for class certification	Class Certification
9/23/2023	Guy Wallace	0.8	\$1,350	\$1,080	legal research and analysis re TransUnion, Olean and individualized damages issues	Class Certification
9/24/2023	Guy Wallace	2.7	\$1,350	\$3,645	preparation of detailed outline of renewed motion for class certification	Class Certification
9/25/2023	Guy Wallace	4.4	\$1,350	\$5,940	preparation of detailed outline of renewed motion for class certification	Class Certification
9/25/2023	Guy Wallace	3.3	\$1,350	\$4,455	revise and edit detailed outline re renewed motion for class certification	Class Certification
9/25/2023	Guy Wallace	1.8	\$1,350	\$2,430	review and analysis of barriers for exhibit to Fourth Amended Complaint; com's with MTJ; JAU; Waters re same	Pleadings and Motions Re: Pleadings
9/25/2023	Jennifer Bybee	0.8	\$925	\$740	Review list or barriers and suggest edits	Class Certification
9/25/2023	Jennifer Bybee	0.1	\$925	\$93	Review outline for renewed motion for class certification	Class Certification
9/25/2023	Jennifer Bybee	0.9	\$925	\$833	Draft GBW Decl iso Renewed MCC	Class Certification
9/25/2023	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re assignments and next steps re Renewed MCC	Class Certification
9/25/2023	Jennifer Bybee	0.7	\$925	\$648	Draft email to GBW re suggested barriers to remove	Class Certification
9/25/2023	Jennifer Bybee	0.1	\$925	\$93	Review emails between GBW, TC, MTJ re renewed MCC	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/25/2023	Jennifer Bybee	0.4	\$925	\$370	Look up claims form research from 23(f) petition and email same to GBW	Class Certification
9/25/2023	Jennifer Bybee	1.3	\$925	\$1,203	Research J. Gilliam opinions re using claims forms to determine damages	Class Certification
9/25/2023	Mark Johnson	0.6	\$1,150	\$690	email coms w/ R Bonner and J Proctor re evidence of move-in fee payment, review of Ex. A to residence agreements; Marquis declaration; proposed structure for Ex. A review project	Class Certification
9/25/2023	Mark Johnson	0.5	\$1,150	\$575	review memos, residence agreements and other documents re payment of move in fees.	Class Certification
9/25/2023	Mark Johnson	5.5	\$1,150	\$6,325	Review Mastin Hemet and Brookhurst reports and work on declaration iso renewed motion for class certification.	Class Certification
9/25/2023	Mark Johnson	0.8	\$1,150	\$920	email exchanges re class barrier list for amendment to complaint; prepare list of barriers to be excluded based on review of Mastin and Waters reply reports	Class Certification
9/25/2023	Mark Johnson	0.5	\$1,150	\$575	preliminary review/scan of D responses to 9th and 10th set of document requests	Discovery (Non-Deposition)
9/25/2023	Travis Close	0.4	\$850	\$340	Email to GBW re: analysis of evidence disregarded in original reply declaration of GBW	Case Organization, Planning and Strategy
9/25/2023	Travis Close	0.3	\$850	\$255	Revisions to draft notice inspection to incorporate language re: alterations	Case Organization, Planning and Strategy
9/25/2023	Travis Close	0.2	\$850	\$170	Email to team re: revisions to draft notice of inspection	Case Organization, Planning and Strategy
9/25/2023	Travis Close	0.7	\$850	\$595	Review and analyze Def's responses to RFPs, Sets 9 and 10	Case Organization, Planning and Strategy
9/25/2023	Travis Close	0.4	\$850	\$340	Analyze CBC versions used for barriers at named plaintiff facilities	Case Organization, Planning and Strategy
9/25/2023	Travis Close	0.4	\$850	\$340	Analysis of evidence excluded from reply declaration of GBW in class cert papers	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/25/2023	Travis Close	1.8	\$850	\$1,530	Legal research as to whether non-plaintiffs may adequately serve as class representatives	Pleadings and Motions Re: Pleadings
9/25/2023	Travis Close	1.2	\$850	\$1,020	Legal research on adequacy of adding vision-impaired class representative to facility-based classes	Pleadings and Motions Re: Pleadings
9/25/2023	Travis Close	0.8	\$850	\$680	Review and analyze revisions to master plaintiff-facility barrier list by GBW	Pleadings and Motions Re: Pleadings
9/25/2023	Travis Close	0.5	\$850	\$425	Research methods for attaching barrier lists to amended complaints for evidentiary/trial purposes	Pleadings and Motions Re: Pleadings
9/26/2023	Guy Wallace	4.8	\$1,350	\$6,480	revise and edit detailed outline of renewed motion for class certification; review and analysis of district court's original class cert opinion	Class Certification
9/26/2023	Guy Wallace	0.8	\$1,350	\$1,080	com's with JY; BBK; AX; RLS re potential class representatives for facility-level subclasses	Class Certification
9/26/2023	Jennifer Bybee	3.1	\$925	\$2,868	Research J. Gilliam opinions re claims administration	Class Certification
9/26/2023	Jennifer Bybee	1.6	\$925	\$1,480	Research re 9th Circuit cases about claims forms post-Briseno	Class Certification
9/26/2023	Mark Johnson	0.4	\$1,150	\$460	email exchanges w/ B Bien-Kahn re site inspection schedule and meet and confer re doc request; email to OC E Rutner to confirm meet and confer and propose site inspections; respond re same; review calendar and Mastin, Waters, Bien-Kahn availability and select inspection dates.	Discovery (Non-Deposition)
9/26/2023	Mark Johnson	1.2	\$1,150	\$1,380	further review of D's responses to 9th and 10th set of document requests.	Discovery (Non-Deposition)
9/26/2023	Rachel Steyer	0.5	\$750	\$375	spoke with Wendy DeMello about possibility of serving as named plaintiff	Class Outreach and Contact
9/26/2023	Rachel Steyer	0.4	\$750	\$300	spoke with Clarence Alvey about possibility of becoming named plaintiff	Class Outreach and Contact
9/26/2023	Rachel Steyer	0.2	\$750	\$150	response to GBW with additional questions about retainer agreement	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/26/2023	Rachel Steyer	0.9	\$750	\$675	reviewing defendants response/objections to RFPs, set 9	Discovery (Non-Deposition)
9/26/2023	Rachel Steyer	0.7	\$750	\$525	Review of defendants responses and objections to RFPs set 10	Discovery (Non-Deposition)
9/26/2023	Travis Close	0.3	\$850	\$255	Email to RLS re: language for duties of class representatives	Case Organization, Planning and Strategy
9/26/2023	Travis Close	0.5	\$850	\$425	Review and analyze updated facility evaluation reports and complaint investigation reports for Ocean House, Nohl Ranch, Oceanside, Tracy, and Windsor facilities	Case Organization, Planning and Strategy
9/26/2023	Travis Close	0.9	\$850	\$765	Analysis & updates to database of declarant contact info to sign up additional plaintiffs	Class Certification
9/26/2023	Travis Close	1.8	\$850	\$1,530	Legal research on attorney fee provisions for claims under Cal Civ. Code section 17200 and CLRA	Pleadings and Motions Re: Pleadings
9/26/2023	Travis Close	1.2	\$850	\$1,020	Analysis of damages at Fountaingrove facility based on a transportation class & named plaintiffs' claims/damages	Pleadings and Motions Re: Pleadings
9/27/2023	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of district court opinion re CLRA and UCL claim and class certification	Class Certification
9/27/2023	Guy Wallace	1.1	\$1,350	\$1,485	com's with MTJ re detailed outline of renewed motion; Defendants' potential arguments re same; potential class representatives re subclasses; results of meet and confer with Defendants re discovery disputes	Class Certification
9/27/2023	Guy Wallace	0.5	\$1,350	\$675	com's with JAU re preparation of renewed MCC and tasks re same	Class Certification
9/27/2023	Guy Wallace	3.6	\$1,350	\$4,860	revise and edit detailed outline re MCC; preparation of additional points re arguments	Class Certification
9/27/2023	Guy Wallace	1.3	\$1,350	\$1,755	preparation of legal research and analysis tasks re renewed motion for class certification	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/27/2023	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re discovery disputes and preparation of MTC re same	Discovery (Non-Deposition)
9/27/2023	Jennifer Bybee	0.5	\$925	\$463	Review outline of renewed MCC	Class Certification
9/27/2023	Jennifer Bybee	0.1	\$925	\$93	Review n.16 in Stiner opinion	Class Certification
9/27/2023	Mark Johnson	0.3	\$1,150	\$345	call w/ T Close re allocation of work, preparation of Barrier List attachment for amended complaint	Case Organization, Planning and Strategy
9/27/2023	Mark Johnson	0.7	\$1,150	\$805	call w/ G Wallace re revisions to outline on class cert motion, recap of meet and confer on RFP sets 9 and 10 and positions taken by D on same and on renewed motion for class cert, barrier list for amended complaint, potential class reps, ED declarations	Case Organization, Planning and Strategy
9/27/2023	Mark Johnson	0.7	\$1,150	\$805	call w/ G Wallace re date range for residency agreements, comments from district court at CMC related to proposed subclassing, declarations from EDs iso opposition to mtn for class certification, potential arguments in opposition to motion to compel benchmark formula, need for declaration to support motion to compel, potential class reps on possible subclasses.	Case Organization, Planning and Strategy
9/27/2023	Mark Johnson	1.2	\$1,150	\$1,380	review and edit, provide comments on revised outline from GBW of renewed class cert motion	Class Certification
9/27/2023	Mark Johnson	0.8	\$1,150	\$920	review indices and analysis of residence agreements for date ranges; locate and review residency agreements for potential subclass reps for payment of community fees and arbitration opt-outs.	Class Certification
9/27/2023	Mark Johnson	1.8	\$1,150	\$2,070	finalize first draft of Mastin declaration iso renewed mtn for class cert	Class Certification
9/27/2023	Mark Johnson	0.3	\$1,150	\$345	review summary and excerpts of ED declarations from T Close; comment on same	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/27/2023	Mark Johnson	0.9	\$1,150	\$1,035	prepare chart of Plaintiffs and other potential class reps for mtg for facility-based access claim classes and review evidence for same.	Class Certification
9/27/2023	Mark Johnson	0.7	\$1,150	\$805	Telephonic meet and confer w/ OC, BBK re document production responsive to set 9 and 10	Discovery (Non-Deposition)
9/27/2023	Mark Johnson	0.8	\$1,150	\$920	final prep for meet and confer on doc request sets 9 and 10 - review and add to notes,	Discovery (Non-Deposition)
9/27/2023	Mark Johnson	0.2	\$1,150	\$230	review B Bien-Kahn notes of discovery meet and confer.	Discovery (Non-Deposition)
9/27/2023	Travis Close	0.6	\$850	\$510	Call with MTJ re: next items for prioritization following today's m/c call	Case Organization, Planning and Strategy
9/27/2023	Travis Close	0.3	\$850	\$255	Further revisions to Rule 34 notice of inspection	Case Organization, Planning and Strategy
9/27/2023	Travis Close	2.3	\$850	\$1,955	Analyze testimony of EDs & HWDs submitted by Defs' in opposition to class cert to determine staffing judgment admissions	Class Certification
9/27/2023	Travis Close	0.2	\$850	\$170	Email to MTJ re: draft declaration of wendy demillo	Class Outreach and Contact
9/27/2023	Travis Close	0.7	\$850	\$595	M/C with Defs re: answers to RFPs, Sets 9 & 10	Communications With Opposing Counsel
9/27/2023	Travis Close	0.4	\$850	\$340	Compile/finish notes from today's M/C with Defs and compare to BBK's notes	Communications With Opposing Counsel
9/27/2023	Travis Close	0.4	\$850	\$340	Prep for today's M/C with Defs by reviewing Def's answers to RPDs 9 & 10; analyze our strategy for compelling discrete categories of docs	Discovery (Non-Deposition)
9/27/2023	Travis Close	1.7	\$850	\$1,445	Analysis of barriers at Hemet facility for potential eliminations & color coding of issues in spreadsheet	Pleadings and Motions Re: Pleadings
9/28/2023	Guy Wallace	0.5	\$1,350	\$675	com's with JAU re Sali and Olean and application of evidentiary rules at class certification stage	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/28/2023	Guy Wallace	1.4	\$1,350	\$1,890	review and analysis of RBGG comments on detailed outline of renewed MCC; legal research and analysis re same; revise and edit outline	Class Certification
9/28/2023	Guy Wallace	0.4	\$1,350	\$540	com's with DTM; MTJ re preparation of further staffing analyses and claims re same	Discovery (Non-Deposition)
9/28/2023	Guy Wallace	2.8	\$1,350	\$3,780	review and analysis of barriers list for 4AC; revise and edit same	Pleadings and Motions Re: Pleadings
9/28/2023	Guy Wallace	1.1	\$1,350	\$1,485	zoom with MTJ; JAU; TCC re revisions to barrier list for 4AC; renewed motion for class certification	Pleadings and Motions Re: Pleadings
9/28/2023	Jennifer Bybee	3.8	\$925	\$3,515	Research whether class cert findings are findings on the merits at trial	Class Certification
9/28/2023	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re Sali and other research	Class Certification
9/28/2023	Jennifer Bybee	1.1	\$925	\$1,018	Conference call with GBW, TC, and MTJ re barrier list	Class Certification
9/28/2023	Mark Johnson	0.3	\$1,150	\$345	email exchanges w/ Marks, Thornton re questions pending re staffing analysis, scheduling mtg	Case Organization, Planning and Strategy
9/28/2023	Mark Johnson	0.5	\$1,150	\$575	research re community fees paid and for what time period; emails w/ GBW re same; status of project for analyzing same for proposed class	Class Certification
9/28/2023	Mark Johnson	4.0	\$1,150	\$4,600	work on G Waters declaration iso renewed mtn for class certification.	Class Certification
9/28/2023	Mark Johnson	0.3	\$1,150	\$345	review draft Rule 34 site inspection notice, coms w/ T Close and B Bien-Kahn re same and re scheduling.	Discovery (Non-Deposition)
9/28/2023	Mark Johnson	1.1	\$1,150	\$1,265	Team mtg w/ G Wallace, J Bybee, T Close re barrier list for amended complaint, categories and specific barriers to be excluded, task assignments.	Pleadings and Motions Re: Pleadings
9/28/2023	Travis Close	0.2	\$850	\$170	Review and analyze changes/revisions to draft notice of inspection proposed by RBGG	Case Organization, Planning and Strategy
9/28/2023	Travis Close	1.2	\$850	\$1,020	Legal research on whether movable objects are barriers under the ADA	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/28/2023	Travis Close	1.1	\$850	\$935	Meeting with MTJ, JUB, GBW re: finalizing master barrier spreadsheet for amended complaint	Case Organization, Planning and Strategy
9/28/2023	Travis Close	1.4	\$850	\$1,190	Analysis of resident acuity data at Tracy facility to determine ID residents with vision disabilities	Discovery (Non-Deposition)
9/28/2023	Travis Close	1.3	\$850	\$1,105	Review, analyze, and incorporate additions proposed to master barrier list by JAU	Pleadings and Motions Re: Pleadings
9/28/2023	Travis Close	1.2	\$850	\$1,020	Review & analyze records of complaints from Tracy facility for individuals with mobility disabilities	Pleadings and Motions Re: Pleadings
9/29/2023	Guy Wallace	3.9	\$1,350	\$5,265	preparation of renewed motion for class certification; analysis of Defendants' potential counter-arguments	Class Certification
9/29/2023	Guy Wallace	1.6	\$1,350	\$2,160	legal research and analysis re standards for renewed motions for class certification or motions for reconsideration re class certification	Class Certification
9/29/2023	Guy Wallace	1.2	\$1,350	\$1,620	zoom with BBK; AX; BU; MTJ; JAU; TCC re renewed motion for class certification; Fourth Amended Complaint	Class Certification
9/29/2023	Guy Wallace	0.8	\$1,350	\$1,080	com's with MTJ re renewed motion for class certification, standards re leave to file same; Dr. Saad and responsive testimony of Dr. Jones	Class Certification
9/29/2023	Guy Wallace	0.7	\$1,350	\$945	com's with JAU re Ninth Circuit decision in Sali, recent case law re same; analysis of implications for renewed motion for class certification	Class Certification
9/29/2023	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of Supreme Court decision in Geraghty, Ninth Circuit decision in Gonzalez re standing and whether the standing of a putative class relates back to the complaint; com's with BU re same	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/29/2023	Guy Wallace	1.2	\$1,350	\$1,620	com's with MTJ re form of motion re subclasses; definition of subclasses; Defendants' potential arguments against consideration of same and responses thereto; potential class representatives for the proposed subclasses; impact of Ninth Circuit decision in Sali re exclusion or disregard of evidence relevant to class certification	Class Certification
9/29/2023	Jennifer Bybee	0.5	\$925	\$463	Research whether class cert determinations are findings on the merits at trial	Class Certification
9/29/2023	Jennifer Bybee	1.6	\$925	\$1,480	Research whether Olean overruled Sali	Class Certification
9/29/2023	Jennifer Bybee	0.3	\$925	\$278	Com's with GBW re did Olean overrule Sali; subclasses.	Class Certification
9/29/2023	Jennifer Bybee	0.6	\$925	\$555	Draft email to GBW re summary of research so far re Olean overruling Sali	Class Certification
9/29/2023	Jennifer Bybee	1.0	\$925	\$925	Conference call with co-counsel re renewed class cert brief	Class Certification
9/29/2023	Mark Johnson	0.9	\$1,150	\$1,035	call w/ GBW re issues related to renewed class cert mtn, including D's arguments why mtn can't be entertained, merits issues; ED testimony, Saad deposition, etc.	Class Certification
9/29/2023	Mark Johnson	1.3	\$1,150	\$1,495	zoom team mtg w/ Wallace, Xu, Umpierre, Close, Bybee, and Bien-Kahn re renewed motion for certification of subclasses, re outline, assignments, further legal research to be done, barrier list.	Class Certification
9/29/2023	Travis Close	1.6	\$850	\$1,360	Review and analyze prior memoranda, summaries, and document compilations regarding employees' discretion to staffing	Case Organization, Planning and Strategy
9/29/2023	Travis Close	0.5	\$850	\$425	Email to GBW re: analysis of evidence excluded in court's class cert opinion	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/29/2023	Travis Close	0.5	\$850	\$425	Review and analyze updated draft outline for renewed motion for class cert	Class Certification
9/29/2023	Travis Close	1.3	\$850	\$1,105	Meeting with MTJ, GBW, and co-counsel re: progress & strategy on renewed motion for class cert	Class Certification
9/29/2023	Travis Close	0.7	\$850	\$595	Analyze & prepare chart of testimony re: service alignment & staffing discretion from deposition of Kimia Ataetian	Class Certification
9/29/2023	Travis Close	0.8	\$850	\$680	Analyze & prepare chart of testimony re: service alignment & staffing discretion from deposition of Theresa Ward	Class Outreach and Contact
9/29/2023	Travis Close	0.8	\$850	\$680	Analyze & prepare chart of testimony re: service alignment & staffing discretion from deposition of Marie Harris	Pleadings and Motions Re: Pleadings
9/30/2023	Guy Wallace	2.8	\$1,350	\$3,780	preparation and drafting of motion for certification of subclasses	Class Certification
9/30/2023	Mark Johnson	1.5	\$1,150	\$1,725	coms w/ Ryan Bonner re residency agreements for named plaintiffs. review same and exhibits and prepare chart re payment of community fees and discounts/waivers. email to GBW re same.	Class Certification
9/30/2023	Mark Johnson	0.3	\$1,150	\$345	calls w/ GBW re renewed class cert mtn, payment of community fees, testimony and evidence re discretion in applying benchmarks	Class Certification
10/1/2023	Guy Wallace	2.8	\$1,350	\$3,780	preparation and drafting renewed motion for class certification; com's with JAU re same	Class Certification
10/1/2023	Guy Wallace	0.9	\$1,350	\$1,215	com's with BU; MTJ re renewed motion for class certification; access subclasses and issues re standing and mootness; use of claims forms	Class Certification
10/1/2023	Jennifer Bybee	1.8	\$925	\$1,665	Research re did Olean overrule Sali; draft results of same into email for GBW	Class Certification
10/1/2023	Jennifer Bybee	0.2	\$925	\$185	Review email from GBW re follow up Sali research	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/1/2023	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re clarification on reply evidence / Sali research follow up	Class Certification
10/1/2023	Mark Johnson	1.5	\$1,150	\$1,725	review depo transcript of Anna Reddy, former ED of San Ramon and pull out excerpts of testimony re service alignment and benchmarks; coms w/ G Wallace re same.	Class Certification
10/1/2023	Mark Johnson	0.2	\$1,150	\$230	coms w/ G Wallace, J Yelin and A Xu re community fees paid by Plaintiffs;	Class Certification
10/1/2023	Mark Johnson	0.5	\$1,150	\$575	review Anderson declaration exhibit and prepare chart of construction dates and applicable CBC / Title 24 editions for GBW use in draft brief iso renewed class cert mtn	Class Certification
10/1/2023	Mark Johnson	0.3	\$1,150	\$345	review D Anderson depo testimony and pull same re readily achievable barrier removal; com w/ G Wallace re same.	Class Certification
10/1/2023	Mark Johnson	0.9	\$1,150	\$1,035	calls (x5) w/ G Wallace re various issues related to renewed class cert motion for certification of subclasses.	Class Certification
10/2/2023	Guy Wallace	2.4	\$1,350	\$3,240	preparation and drafting of renewed motion for class certification; statement of facts	Class Certification
10/2/2023	Guy Wallace	1.8	\$1,350	\$2,430	analysis of arguments re Rule 23(b)(3) damages subclasses re six facilities; com's with MTJ re same	Class Certification
10/2/2023	Guy Wallace	0.9	\$1,350	\$1,215	com's with MTJ; JAU re application of Sali and district court's failure to consider Plaintiffs' reply evidence	Class Certification
10/2/2023	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ; JAU re district court's ruling re attorney declarations and form of same and submission of revised declarations for renewed motion	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/2/2023	Guy Wallace	1.5	\$1,350	\$2,025	prepare for and participate in zoom with DTM; JT; MTJ re staffing analysis, renewed motion for class certification, preparation for trial	Class Certification
10/2/2023	Guy Wallace	0.5	\$1,350	\$675	com's with JY; BBK; MTJ re preparation for renewed motion re subclasses; potential class representatives for Brookhurst, Tracy facilities re visual impairment and mobility impairments putative representatives	Class Certification
10/2/2023	Jennifer Bybee	2.1	\$925	\$1,943	Research admissibility of evidence on reply in class certification motion	Class Certification
10/2/2023	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re reply material	Class Certification
10/2/2023	Jennifer Bybee	0.9	\$925	\$833	Review class cert denial order, scheduling order, etc. in prep for research	Class Certification
10/2/2023	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re research on reply evidence exclusion	Class Certification
10/2/2023	Mark Johnson	1.5	\$1,150	\$1,725	video conference w/ G Wallace, David Marks, J Thornton re further data analysis for renewed class cert motion and trial wrt 6 facilities and possibly more; discovery issue re benchmark formula.	Case / Document Administration
10/2/2023	Mark Johnson	0.5	\$1,150	\$575	review prior emails from D Marks re needed data, status of staffing analyses in preparation for video conference re same	Case Organization, Planning and Strategy
10/2/2023	Mark Johnson	1.1	\$1,150	\$1,265	calls (x6) w/ G Wallace re evidentiary issues on class cert mtn for subclasses, prior rulings excluding reply evidence; data and staffing analysis for renewed motion and trial;	Case Organization, Planning and Strategy
10/2/2023	Mark Johnson	0.5	\$1,150	\$575	Teams conference w/ R Bonner, J Proctor, B Kelly and N Thompson re project analyzing community fee payments based on Ex A and Addenda;	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/2/2023	Mark Johnson	5.0	\$1,150	\$5,750	work on Waters Declaration; review of reports, prior declarations, public documents for same	Class Certification
10/2/2023	Mark Johnson	0.4	\$1,150	\$460	email exchanges w/ R Bonner re doc review project re community fees; assignment of additional resources re same, additional docs to review and schedule mtg with new reviewers.	Class Certification
10/2/2023	Travis Close	0.2	\$850	\$170	Email to team re: updated barrier list	Case Organization, Planning and Strategy
10/2/2023	Travis Close	0.6	\$850	\$510	Review and analyze Evenflo x. Xavier decision in First Circuit to determine applicability to our claims for misrepresentation	Case Organization, Planning and Strategy
10/2/2023	Travis Close	1.4	\$850	\$1,190	Review, analyze, and summarize testimony from 30(b)(6) depo (Vol 1) on "Assessment/staffing" regarding discretion given to ED re staffing	Class Certification
10/2/2023	Travis Close	1.4	\$850	\$1,190	Review, analyze, and summarize testimony from 30(b)(6) depo (Vol 2) on "Assessment/staffing" regarding discretion given to ED re staffing	Class Certification
10/2/2023	Travis Close	1.6	\$850	\$1,360	Revisions to master barrier list incorporating feedback from team	Pleadings and Motions Re: Pleadings
10/2/2023	Travis Close	1.2	\$850	\$1,020	Review, analyze, and summarize depo testimony of Marie Harris re: service alignment & discretion for staffing/scheduling	Pleadings and Motions Re: Pleadings
10/2/2023	Travis Close	0.2	\$850	\$170	Email to GBW re: analysis of staffing discretion in considering service alignment	Pleadings and Motions Re: Pleadings
10/2/2023	Travis Close	0.3	\$850	\$255	Review and analyze revised outline for motion for class cert by GBW	Pleadings and Motions Re: Pleadings
10/3/2023	Guy Wallace	3.2	\$1,350	\$4,320	preparation and drafting of renewed MCC re subclasses; statement of facts	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/3/2023	Guy Wallace	2.6	\$1,350	\$3,510	preparation and drafting of motion re subclasses; statement of facts, including disability access and SA alignment discussions	Class Certification
10/3/2023	Guy Wallace	3.4	\$1,350	\$4,590	preparation and drafting of argument sections re motion for subclasses	Class Certification
10/3/2023	Guy Wallace	0.3	\$1,350	\$405	com's with GG re preparation of motion re subclasses	Class Certification
10/3/2023	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ; JAU; TCC re preparation of motion re subclasses	Class Certification
10/3/2023	Jennifer Bybee	2.2	\$925	\$2,035	Research court should consider evidence of class certification even if submitted on reply	Class Certification
10/3/2023	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re status update re research	Class Certification
10/3/2023	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re subclasses	Class Certification
10/3/2023	Jennifer Bybee	0.8	\$925	\$740	Research whether there's greater leeway in considering reply evidence on motions for class cert	Class Certification
10/3/2023	Jennifer Bybee	0.7	\$925	\$648	Draft email to GBW re reply research	Class Certification
10/3/2023	Mark Johnson	0.6	\$1,150	\$690	call w/ G Wallace re motion to compel benchmark algorithm and alternative strategies for obtaining the same information, expert declarations iso certification of subclasses	Case Organization, Planning and Strategy
10/3/2023	Mark Johnson	0.3	\$1,150	\$345	calls w/ G Wallace re potential class rep at Tracy w/ mobility impairment; Plaintiff R Schmidt and conversation w/ G Grunfeld re same.	Class Certification
10/3/2023	Mark Johnson	0.7	\$1,150	\$805	review and analyze 10 pg draft statement of facts for motion to certify subclasses.	Class Certification
10/3/2023	Mark Johnson	4.5	\$1,150	\$5,175	work on Waters declaration and review reports for same	Class Certification
10/3/2023	Mark Johnson	2.5	\$1,150	\$2,875	continued work on Waters declaration iso mtn to certify subclasses and review and analyze barrier reports for same.	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/3/2023	Mark Johnson	0.1	\$1,150	\$115	review email memo from G Grunfeld re elder abuse claim and response from G Wallace.	Pleadings and Motions Re: Pleadings
10/3/2023	Travis Close	1.7	\$850	\$1,445	Draft summary analysis of 30(b)(6) deposition, Topic 5, regarding discretion for staffing communities	Case Organization, Planning and Strategy
10/3/2023	Travis Close	1.8	\$850	\$1,530	Draft analysis of facility-level staffing policies produced in discovery	Class Certification
10/3/2023	Travis Close	0.8	\$850	\$680	Legal research on cases finding that commonality is supported despite staff discretion to follow problematic/discriminatory policies	Class Certification
10/3/2023	Travis Close	0.2	\$850	\$170	Email to GBW re: analysis of Bowman testimony re: discreiton	Depositions
10/3/2023	Travis Close	2.3	\$850	\$1,955	Compile testimony & draft analysis for testimony from Rhonda Dolcater at deposition regarding staffing discretion	Depositions
10/3/2023	Travis Close	0.9	\$850	\$765	Review and analyze recent facility evaluation and complaint investigation reports issued for Riverwalk, Monrovia, Roseville, Sylvan Ranch, North Euclid, Claremont, Oceanside, Lodi, and Chanate facilities	Discovery (Non-Deposition)
10/4/2023	Guy Wallace	2.3	\$1,350	\$3,105	preparation and drafting of motion for subclasses; applicable legal standards re same	Class Certification
10/4/2023	Guy Wallace	3.8	\$1,350	\$5,130	preparation and drafting of motion for certification of subclasses; sections re applicable standards and standing of the named Plaintiffs	Class Certification
10/4/2023	Guy Wallace	0.7	\$1,350	\$945	review and analysis of email from Marks re compliance with SA benchmarks	Class Certification
10/4/2023	Guy Wallace	1.1	\$1,350	\$1,485	com's with GG; BU; MTJ re submission of two motions or a single motion for certification of all proposed subclasses; review and analysis of August 24, 2023 CMC transcript	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/4/2023	Guy Wallace	0.6	\$1,350	\$810	com's with GG; BU; MTJ re preparation of declarations for named Plaintiffs and any additional proposed class representatives; com's with MTJ re outreach re same for Tracy facility	Class Certification
10/4/2023	Guy Wallace	0.8	\$1,350	\$1,080	preparation of section re numerosity for access subclasses; com's with BU re same	Class Certification
10/4/2023	Guy Wallace	0.2	\$1,350	\$270	com's with BU re preparation of section re Geraghty; Gonzalez and why the Plaintiffs' injunctive relief claims relate back to the Complaint	Class Certification
10/4/2023	Guy Wallace	0.8	\$1,350	\$1,080	preparation of motion re subclasses; commonality for facility-level classes	Class Certification
10/4/2023	Guy Wallace	0.6	\$1,350	\$810	review and analysis of barriers list for 4AC; com's with GG; MTJ; TCC re same	Pleadings and Motions Re: Pleadings
10/4/2023	Jennifer Bybee	1.8	\$925	\$1,665	Draft memo re weight to be accorded to findings at class certification	Class Certification
10/4/2023	Jennifer Bybee	0.1	\$925	\$93	Draft email to GBW attaching research memo re findings of fact at class cert	Class Certification
10/4/2023	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re discretion research	Class Certification
10/4/2023	Mark Johnson	0.3	\$1,150	\$345	call w/ G Wallace and email exchange w/ Co-counsel re seeking additional pages for mtn to certify subclasses, addressing court and D's expectation that two separate motions will be filed; review transcript of CMC re same.	Class Certification
10/4/2023	Mark Johnson	0.7	\$1,150	\$805	email exchanges w/ G Wallace, R Steyer and Talal Al-Hindi re identification of Tracy residents and contact information for same for outreach to residents with mobility disabilities and past communications with those potential class members, location of spreadsheets.	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/4/2023	Mark Johnson	3.9	\$1,150	\$4,485	calls to Tracy residents and reps of same re status of case, proposed mtn for subclasses on access case and potential involvement as proposed class member; review files of prior communications by firm with same; review residency agreements for background.	Class Certification
10/4/2023	Mark Johnson	3.7	\$1,150	\$4,255	drafting P section of joint ltr brief re Benchmark formula; review requests, prior requests and prior letter briefs and order for same; review related legal research from J Bybee re non-binding nature of findings at class cert stage for same.	Other Motions
10/4/2023	Mark Johnson	1.5	\$1,150	\$1,725	review order and amended complaint in prior case to comply with Oliver v Ralphs grocery requirement to include barriers. Draft language for proposed 4th amended complaint for same purpose, draft email to G Wallace re same	Pleadings and Motions Re: Pleadings
10/4/2023	Travis Close	0.6	\$850	\$510	Review and analyze draft statement of facts by GBW for class cert motion	Class Certification
10/4/2023	Travis Close	1.3	\$850	\$1,105	Legal research on burden of proof to show readily achievable barrier removal	Class Certification
10/4/2023	Travis Close	0.2	\$850	\$170	Email to GBW re: analysis of vision-impaired plaintiff at hemet facility	Class Certification
10/4/2023	Travis Close	1.7	\$850	\$1,445	Review and analyze evidence of visual impairment for Lawrence Quinlan using plaintiffs' files and Brookdale-produced records	Pleadings and Motions Re: Pleadings
10/4/2023	Travis Close	2.2	\$850	\$1,870	Legal research on whether breakfast dispensers (cereal, hot water, etc) are barriers under ADA	Pleadings and Motions Re: Pleadings
10/4/2023	Travis Close	0.3	\$850	\$255	Email to team sharing revised barrier list & next steps for complaint revision	Pleadings and Motions Re: Pleadings
10/5/2023	Guy Wallace	3.1	\$1,350	\$4,185	preparation and drafting of motion for disability access subclasses	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/5/2023	Guy Wallace	2.2	\$1,350	\$2,970	preparation and drafting of arguments re certification of access subclasses; consumer fraud claims	Class Certification
10/5/2023	Guy Wallace	2.1	\$1,350	\$2,835	preparation and drafting of argument re certification of access subclasses; legal research and analysis re same	Class Certification
10/5/2023	Jennifer Bybee	0.4	\$925	\$370	Review draft of why we should be permitted to seek subclasses	Class Certification
10/5/2023	Mark Johnson	0.5	\$1,150	\$575	call w/ G Wallace re progress and strategy on draft mtn for certification of subclasses, potential additional class rep for Tracy mobility class.	Class Certification
10/5/2023	Mark Johnson	4.5	\$1,150	\$5,175	continue research re potential class reps for Tracy mobility subclass, including review of residency agreements and 3 class member spreadsheets w notes on prior communications and contact information; calls to reps/family members of residents or former residents.	Class Certification
10/5/2023	Mark Johnson	0.4	\$1,150	\$460	calls and emails w/ R Bonner re Tracy resident agreements and progress on review of community fee payments per Ex A to agreements.	Class Certification
10/5/2023	Mark Johnson	2.5	\$1,150	\$2,875	work on draft joint letter brief iso mtn to compel benchmark calculations.	Other Motions
10/5/2023	Mark Johnson	0.5	\$1,150	\$575	review and incorporate further revisions to draft proposed fourth amended complaint; emails to/from COC re same	Pleadings and Motions Re: Pleadings
10/5/2023	Mark Johnson	0.3	\$1,150	\$345	coms w/ G Wallace and T Close re barrier list and inclusion of S Stiner barriers; review ltr to Shawn Cull re same.	Pleadings and Motions Re: Pleadings
10/5/2023	Travis Close	1.4	\$850	\$1,190	Review and analyze communications from plaintiffs to brookdale staff re: specific barriers alleged in-unit	Discovery (Non-Deposition)
10/5/2023	Travis Close	1.5	\$850	\$1,275	Further revisions to draft barrier list (Exh. to amended complaint)	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/5/2023	Travis Close	0.2	\$850	\$170	Email to MTJ re: letter with specific barriers from Stiner to Shawn Cull	Pleadings and Motions Re: Pleadings
10/5/2023	Travis Close	0.2	\$850	\$170	Email to team re: latest version of barrier list	Pleadings and Motions Re: Pleadings
10/5/2023	Travis Close	0.3	\$850	\$255	Review and analyze revisions made to 4th amended complaint	Pleadings and Motions Re: Pleadings
10/5/2023	Travis Close	0.6	\$850	\$510	Legal research on duty to comply with Oliver v. Ralphs Grocery Co. in describing attached barrier list in complaint	Pleadings and Motions Re: Pleadings
10/5/2023	Travis Close	0.4	\$850	\$340	Review and analyze final fourth amended complaint & exhibits for inadvertent errors before sharing with Defs	Pleadings and Motions Re: Pleadings
10/5/2023	Travis Close	0.8	\$850	\$680	Research U.S. Parole Comm. v. Geraghty's progeny in ninth circuit describing duty to consider sub-classes	Pleadings and Motions Re: Pleadings
10/6/2023	Guy Wallace	0.7	\$1,350	\$945	analysis of readily achievable barrier removal and argument re commonality; legal standards for new and existing construction	Class Certification
10/6/2023	Guy Wallace	0.5	\$1,350	\$675	com's with GG; BU; MTJ re elder financial abuse and potential approach of using a claims form	Class Certification
10/6/2023	Guy Wallace	1.2	\$1,350	\$1,620	prepare for and participate in zoom with GG; JY; AX; KS; BU; MTJ; TCC re preparation for motion re subclasses	Class Certification
10/6/2023	Guy Wallace	2.1	\$1,350	\$2,835	preparation and drafting of argument re certification of damages subclasses; legal research and analysis re same	Class Certification
10/6/2023	Guy Wallace	0.5	\$1,350	\$675	com's with BU; JT re benchmarks and comparison to required hours	Class Certification
10/6/2023	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re potential proposed subclass representative; subclass definitions	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/6/2023	Guy Wallace	2.2	\$1,350	\$2,970	preparation and drafting of introduction to motion for subclasses; com's with MTJ re potential revisions to draft subclass definitions	Class Certification
10/6/2023	Jennifer Bybee	1.4	\$925	\$1,295	Research does discretion defeat commonality	Class Certification
10/6/2023	Mark Johnson	0.1	\$1,150	\$115	email to GBW with update on outreach to possible Tracy class reps	Class Certification
10/6/2023	Mark Johnson	1.0	\$1,150	\$1,150	team zoom mtg w/ Wallace, Grunfeld, Xu, Yelin, Close, Umpierre, Stilber re progress on drafting of brief, Wallace Declaration, other declarations iso mtn to certify subclasses, strategy on specific issues, elder abuse claim and common proof re "of an elder," assignments, motion to compel, mtn to expand page limitation.	Class Certification
10/6/2023	Mark Johnson	2.5	\$1,150	\$2,875	telephone interview with potential class rep for Tracy mobility class if court certifies facility level classes.	Class Certification
10/6/2023	Mark Johnson	0.6	\$1,150	\$690	review proposed definitions for 8 proposed subclasses; draft comments and possible issues re same for G Wallace review and discussion.	Class Certification
10/6/2023	Mark Johnson	1.0	\$1,150	\$1,150	continue working on and finalize draft joint letter brief re benchmark formula. email to Co-counsel re same.	Other Motions
10/6/2023	Mark Johnson	0.3	\$1,150	\$345	review and analyze proposed edits from T Close and B Umpierre to joint letter brief re benchmark formula.	Other Motions
10/6/2023	Mark Johnson	0.2	\$1,150	\$230	review emails from OC re proposed fourth amended complaint, request for additional pages for motion to certify subclasses, proposed compromise on discovery dispute re benchmark formulas.	Other Motions
10/6/2023	Mark Johnson	2.7	\$1,150	\$3,105	research and work on admin mtn to expand page limits on mtn to certify subclasses.	Other Motions
10/6/2023	Travis Close	0.6	\$850	\$510	Review, analyze, and propose revisions to Ps' section of draft joint letter brief re: benchmark formula	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/6/2023	Travis Close	1.6	\$850	\$1,360	Legal research re: how likelihood of obtaining relevant discovery affects proportionality test	Discovery (Non-Deposition)
10/6/2023	Travis Close	0.8	\$850	\$680	Analyze key testimony by Kevin Bowman contrasting methods of calculation for benchmarks vs. Flores' calculation	Discovery (Non-Deposition)
10/6/2023	Travis Close	1.7	\$850	\$1,445	Legal research on cases where parties were ordered to produce algorithms in discovery that they claimed were burdensome	Discovery (Non-Deposition)
10/6/2023	Travis Close	0.5	\$850	\$425	Review and analyze methods of Flores for determining inputs of acuity norms (joint letter brief re: benchmarks)	Discovery (Non-Deposition)
10/6/2023	Travis Close	1.1	\$850	\$935	Meeting with GBW, MTJ, and co-counsel re: strategy for motion for class cert & amended complaint filing	Pleadings and Motions Re: Pleadings
10/7/2023	Guy Wallace	1.4	\$1,350	\$1,890	preparation and drafting of motion re subclasses	Class Certification
10/7/2023	Guy Wallace	1.8	\$1,350	\$2,430	preparation and drafting of preliminary version of introduction to motion for subclasses	Class Certification
10/7/2023	Guy Wallace	1.3	\$1,350	\$1,755	com's with CJH; BU; MTJ re proposed subclass re elder financial abuse; analysis of claim and issues re liability and damages and use of claims form	Class Certification
10/7/2023	Jennifer Bybee	1.4	\$925	\$1,295	Research commonality and local discretion	Class Certification
10/7/2023	Jennifer Bybee	0.5	\$925	\$463	Look up how J. Gilliam used claims form in Dickey; email same to GBW	Class Certification
10/7/2023	Mark Johnson	1.5	\$1,150	\$1,725	call with 2nd potential contingent class rep re status of case, father's experience at Brookdale Tracy, potential participation in case as class rep; declaration for same	Class Certification
10/7/2023	Mark Johnson	0.3	\$1,150	\$345	calls w/ G Wallace re interview with potential Tracy mobility class rep., class definitions, other issues related to mtn to certify subclasses	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/7/2023	Mark Johnson	0.2	\$1,150	\$230	review preliminary draft of mtn for certification of subclasses.	Class Certification
10/7/2023	Mark Johnson	3.4	\$1,150	\$3,910	further work on admin mtn for enlargement of page limitation for mtn for subclasses	Other Motions
10/8/2023	Guy Wallace	0.4	\$1,350	\$540	review and analysis of draft request for additional pages re motion for subclasses	Class Certification
10/8/2023	Guy Wallace	4.9	\$1,350	\$6,615	preparation and drafting of motion for subclasses re consumer fraud	Class Certification
10/8/2023	Guy Wallace	0.2	\$1,350	\$270	com's with BU re argument re certification of consumer subclasses	Class Certification
10/8/2023	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re Marquis declaration re Community Fees; request for additional pages for brief re subclasses	Class Certification
10/8/2023	Mark Johnson	0.6	\$1,150	\$690	call w/ G Wallace re Marquis declaration and review of docs showing payment of community fees, admin mtn for enlargement of page limitations, anticipated arguments in opposition to motion and briefing schedule, definition of subclasses.	Class Certification
10/8/2023	Mark Johnson	1.5	\$1,150	\$1,725	review and analyze task list from A Xu for mtn for subclasses; begin draft decs for Stiner, Marquis and potential mobility class reps for Tracy.	Class Certification
10/9/2023	Guy Wallace	2.4	\$1,350	\$3,240	preparation and drafting of motion for subclasses; consumer fraud claims	Class Certification
10/9/2023	Guy Wallace	0.7	\$1,350	\$945	legal research and analysis re issue of discretion and commonality; com's with JAU re same	Class Certification
10/9/2023	Guy Wallace	2.1	\$1,350	\$2,835	preparation and drafting of motion for subclasses; argument re Community Fees	Class Certification
10/9/2023	Guy Wallace	2.3	\$1,350	\$3,105	preparation and drafting of motion re subclasses; com's with JY; AX; BU; re same (.5)	Class Certification
10/9/2023	Jennifer Bybee	3.9	\$925	\$3,608	Research local discretion and class certification	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/9/2023	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re discretion research	Class Certification
10/9/2023	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re discretion	Class Certification
10/9/2023	Mark Johnson	1.2	\$1,150	\$1,380	call w/ rep for Tracy resident re potential class rep for proposed Tracy mobility subclass	Class Certification
10/9/2023	Mark Johnson	0.4	\$1,150	\$460	text and calls with S Stiner re status, progress on proposed mtn for subclasses, additional declaration	Class Certification
10/9/2023	Mark Johnson	1.1	\$1,150	\$1,265	draft declaration of S Stiner iso mtn for proposed mtn to certify subclasses	Class Certification
10/9/2023	Mark Johnson	0.5	\$1,150	\$575	call w/ G Wallace re elder abuse claim and arguments iso certification of same; progress on Community fee analysis; application for enlargement of page limitations for motion and draft of joint letter brief for mtn to compel benchmark formula.	Class Certification
10/9/2023	Mark Johnson	0.5	\$1,150	\$575	email and call (.4) w/ R Steyer re communications with potential plaintiffs for proposed Tracy mobility class; leads for same; draft declarations	Class Certification
10/9/2023	Mark Johnson	0.1	\$1,150	\$115	coms w/ experts re barrier list and expert reports iso proposed mtn for certification of subclasses.	Class Certification
10/9/2023	Mark Johnson	0.4	\$1,150	\$460	emails and call w/ R Bonner and w/ K Marquis re Community Fee Analysis project and Marquis declaration	Class Certification
10/9/2023	Mark Johnson	0.3	\$1,150	\$345	review and analyze RBBG draft of section on elder financial abuse claim	Class Certification
10/9/2023	Mark Johnson	4.7	\$1,150	\$5,405	revise and add to draft declaration of G Waters iso proposed motion for subclasses, review reports for same.	Class Certification
10/9/2023	Rachel Steyer	0.4	\$750	\$300	call with MTJ to review and discuss outreach efforts with Tracy residents	Class Outreach and Contact
10/9/2023	Rachel Steyer	3.2	\$750	\$2,400	reviewing and gathering documents in Relativity for potential new declarants	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/9/2023	Rachel Steyer	0.2	\$750	\$150	reviewing BBK notes and memo from meet and confer with OC	Discovery (Non-Deposition)
10/9/2023	Rachel Steyer	0.5	\$750	\$375	reviewing draft GBW statement of facts for MCC	Other Motions
10/9/2023	Rachel Steyer	0.2	\$750	\$150	reviewing internal communications concerning TCC and MTJ comments and edits to MCC outline, TCC memo of ED and HWD declarations	Other Motions
10/9/2023	Rachel Steyer	0.2	\$750	\$150	reviewing email from MTJ to OC distributing FAC, reviewing redlines in proposed FAC	Pleadings and Motions Re: Pleadings
10/9/2023	Travis Close	1.2	\$850	\$1,020	legal research on ability to propose subclasses	Class Certification
10/9/2023	Travis Close	1.3	\$850	\$1,105	legal research on cases certifying subclasses under the ADA	Class Certification
10/9/2023	Travis Close	0.8	\$850	\$680	Review, analyze, and propose revisions for draft introduction to class cert motion	Class Certification
10/10/2023	Guy Wallace	4.2	\$1,350	\$5,670	preparation and drafting of motion re subclasses	Class Certification
10/10/2023	Guy Wallace	0.5	\$1,350	\$675	com's with Waters re scope of relief potentially available from readily achievable standard with respect to Brookdale facilities constructed in the 1980s	Class Certification
10/10/2023	Guy Wallace	0.3	\$1,350	\$405	com's w/ BU re motion for subclasses	Class Certification
10/10/2023	Guy Wallace	0.4	\$1,350	\$540	com's with CJH re elder financial abuse subclass and property "of an elder"	Class Certification
10/10/2023	Guy Wallace	0.6	\$1,350	\$810	revise and edit declarations of proposed subclass representatives	Class Certification
10/10/2023	Guy Wallace	2.2	\$1,350	\$2,970	preparation of motion re subclasses; incorporation of draft sections from BU and RBGG; revise and edit same	Class Certification
10/10/2023	Guy Wallace	1.5	\$1,350	\$2,025	revise and edit draft motion for extra pages re subclass motion; com's with MTJ re same	Other Motions
10/10/2023	Jennifer Bybee	2.3	\$925	\$2,128	Draft memo re discretion research; email same to GBW	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/10/2023	Mark Johnson	3.2	\$1,150	\$3,680	work on K Marquis declaration iso mtn for leave to file mtn to certify subclasses; review prior email exchanges w/ R Bonner, relativity coding panel and other documents for same. Draft cover email to R Bonner and Guy Wallace re issues pertaining to Community Fee document review and Marquis declaration	Class Certification
10/10/2023	Mark Johnson	0.3	\$1,150	\$345	text exchanges and call w/ client S Stiner; review draft of her declaration iso mtn for subclasses over the phone with her and discuss arrangements for getting signature.	Class Certification
10/10/2023	Mark Johnson	0.2	\$1,150	\$230	email exchanges w/ Waters, Mastin re expert reports, declarations iso mtn for leave to file mtn for subclasses, scheduling a mtg	Class Certification
10/10/2023	Mark Johnson	0.1	\$1,150	\$115	review and respond to T Close email re Waters San Ramon access survey reports.	Class Certification
10/10/2023	Mark Johnson	0.7	\$1,150	\$805	review and draft response to J Bybee inquiry re Mastin and Waters reports and revision to same for mtn for leave to file mtn to certify subclasses; locate and send copies and folder information for reports; outline potential revisions to same and issues to consider	Class Certification
10/10/2023	Mark Johnson	0.9	\$1,150	\$1,035	make revisions to admin mtn for order enlarging page limits on mtn for leave to file mtn to certify subclasses based on conversation w/ G Wallace	Other Motions
10/10/2023	Mark Johnson	2.3	\$1,150	\$2,645	review and incorporate further edits and revisions from co-counsel to admin mtn for page limit enlargement; draft declaration iso mtn and proposed order; review and integrate edits to dec from G Wallace; coms w/ L Castro re filing same.	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/10/2023	Mark Johnson	0.3	\$1,150	\$345	multiple email exchanges w/ OC E Rutner re proposed fourth amended complaint, Ds objections, terms of stipulation, language reserving right to further amendments; com w/ COC re draft response to objections and re need for stip and order.	Pleadings and Motions Re: Pleadings
10/10/2023	Rachel Steyer	1.7	\$750	\$1,275	reviewing and gathering documents in Relativity for potential declarations	Discovery (Non-Deposition)
10/10/2023	Rachel Steyer	0.3	\$750	\$225	reviewing MTJ draft admin motion to expand page length	Other Motions
10/10/2023	Rachel Steyer	1.7	\$750	\$1,275	reviewing draft Waters declaration circulated by MTJ	Other Motions
10/10/2023	Travis Close	0.8	\$850	\$680	Review, analyze, and propose revisions for draft Gary Waters Dec iso. motion for class cert.	Class Certification
10/10/2023	Travis Close	0.6	\$850	\$510	Analyze rooms inspected in San Ramon facility to verify photos & specific measurements for each	Class Certification
10/10/2023	Travis Close	0.3	\$850	\$255	Review and analyze draft Decl of Jeanette algarne iso class cert	Class Certification
10/10/2023	Travis Close	0.8	\$850	\$680	Analyze evidence of visual impairment of plaintiffs & class members at Fountaingrove facility	Class Certification
10/10/2023	Travis Close	0.3	\$850	\$255	Review, analyze, and propose revisions for draft admin motion to enlarge page limits	Class Certification
10/10/2023	Travis Close	0.7	\$850	\$595	Analyze medical records of jeanette algarne (Brookhurst) to determine extent of vision impairment	Discovery (Non-Deposition)
10/10/2023	Travis Close	0.3	\$850	\$255	Review and analyze draft Decl of Ralph Carlson iso class cert	Discovery (Non-Deposition)
10/10/2023	Travis Close	0.7	\$850	\$595	Review and analyze construction history for Fountaingrove facility to verify applicable CBC version	Discovery (Non-Deposition)
10/10/2023	Travis Close	0.7	\$850	\$595	Review and analyze construction history for San Ramon facility to verify applicable CBC version	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/10/2023	Travis Close	0.8	\$850	\$680	Review and analyze recent facility evaluation and complaint investigation reports issued for Oceanhouse, Valley view, Brookhurst, Roseville, Folsom, Clairemont, Windsor, and Chanate facilities	Discovery (Non-Deposition)
10/10/2023	Travis Close	0.3	\$850	\$255	Email to team re: revisions to decl. of Gary Waters	Pleadings and Motions Re: Pleadings
10/11/2023	Guy Wallace	2.6	\$1,350	\$3,510	preparation and drafting of motion for subclasses	Class Certification
10/11/2023	Guy Wallace	0.3	\$1,350	\$405	com's with BU re preparation of declarations of Jones; Belson; Flores	Class Certification
10/11/2023	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ; JAU re declarations of Waters; Mastin and revisions to facility reports re the six facilities for motion for subclasses	Class Certification
10/11/2023	Guy Wallace	2.7	\$1,350	\$3,645	review and analysis of draft declarations of Dr. Jones; Dr. Flores; Dr. Kennedy; Marquis	Class Certification
10/11/2023	Guy Wallace	0.7	\$1,350	\$945	com's with BU; MTJ re draft declarations of Dr. Jones; Dr. Flores	Class Certification
10/11/2023	Guy Wallace	0.5	\$1,350	\$675	com's with AX; MTJ; RLS re draft declarations of proposed subclass representatives; potential representatives with visual impairments	Class Certification
10/11/2023	Jennifer Bybee	0.2	\$925	\$185	Review emails re expert reports	Class Certification
10/11/2023	Jennifer Bybee	0.3	\$925	\$278	Com's with MTJ and TCC re barrier list	Class Certification
10/11/2023	Jennifer Bybee	0.1	\$925	\$93	Com's with A. Xu re Word documents of expert reports	Class Certification
10/11/2023	Jennifer Bybee	1.0	\$925	\$925	Review expert reports for Scotts Valley and remove unnecessary material	Class Certification
10/11/2023	Mark Johnson	0.7	\$1,150	\$805	Teams call with R Bonner and K Marquis re community fee review project; Marquis declaration iso mtn for certification of subclasses	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/11/2023	Mark Johnson	1.8	\$1,150	\$2,070	review and edit draft of mtn for leave to seek certification of subclasses; identify passages for citation to expert reports	Class Certification
10/11/2023	Mark Johnson	1.1	\$1,150	\$1,265	Zoom mtg w/ Xu, Wallace, Yelin, Umpierre, /Close, Stilber, Steyer, Bien-Kahn re progress on all components of mtn for leave to file motion for certification of subclasses, assignments, task list, status of expert and other declarations.	Class Certification
10/11/2023	Mark Johnson	1.2	\$1,150	\$1,380	review and revise draft of Marquis declaration based on call w/ him and Ryan; coms w/ Ryan and Justin re exhibits for declaration.	Class Certification
10/11/2023	Mark Johnson	0.8	\$1,150	\$920	review and analyze clean and redline versions of draft declaration of P Kennedy iso mtn for certification of subclasses.	Class Certification
10/11/2023	Mark Johnson	0.3	\$1,150	\$345	draft email to G Wallace w/ comments on draft declaration of P Kennedy iso mtn for certification of subclasses and potential issues re damages model.	Class Certification
10/11/2023	Mark Johnson	1.0	\$1,150	\$1,150	draft and revise stip and order for filing of 4th amended complaint, pull together exhibits for same and exhibit for complaint; draft cover email for same to OC	Pleadings and Motions Re: Pleadings
10/11/2023	Rachel Steyer	5.5	\$750	\$4,125	reviewing document production in relativity for Stacia Stiner for visual impairments	Discovery (Non-Deposition)
10/11/2023	Rachel Steyer	1.1	\$750	\$825	team meeting with RBGG, MTJ, GBW, TCC to review and discuss task list for MCC	Other Motions
10/11/2023	Travis Close	0.3	\$850	\$255	Review and analyze updated filing checklist for class cert motion & amended complaint	Class Certification
10/11/2023	Travis Close	1.2	\$850	\$1,020	Team meeting with RLS, MTJ, GBW, and co-counsel re: progress on amended complaint, declarations, & new analyses	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/11/2023	Travis Close	0.3	\$850	\$255	Review, analyze, and propose revisions for draft declaration of heather fisher iso Ps' motion for class cert	Class Certification
10/11/2023	Travis Close	0.3	\$850	\$255	Review, analyze, and propose revisions for draft declaration of pat lindstrom iso Ps' motion for class cert	Class Certification
10/11/2023	Travis Close	1.3	\$850	\$1,105	Review, analyze & revise draft motion for leave to file certification of subclass	Class Certification
10/11/2023	Travis Close	0.9	\$850	\$765	Analyze Brookdale's auditing process for verifying community fees paid with info on residency agreement addendums	Class Certification
10/11/2023	Travis Close	0.8	\$850	\$680	Investigate evidence of visual impairment for Stacia Stiner & others at San Ramon facility	Discovery (Non-Deposition)
10/11/2023	Travis Close	0.9	\$850	\$765	Research evidence of community fees paid at San Ramon & Fountaingrove facilities	Discovery (Non-Deposition)
10/11/2023	Travis Close	0.7	\$850	\$595	Research evidence of community fees paid at Tracy & Brookhust facilities	Discovery (Non-Deposition)
10/11/2023	Travis Close	0.5	\$850	\$425	Analyze impact of advanced customizations on SA formula based on brookdale-produced documents	Discovery (Non-Deposition)
10/11/2023	Travis Close	0.3	\$850	\$255	Email to co-counsel re: evidence of Quinlan's vision disability	Pleadings and Motions Re: Pleadings
10/12/2023	Guy Wallace	0.6	\$1,350	\$810	revise and edit draft Waters declaration re motion for subclasses	Class Certification
10/12/2023	Guy Wallace	0.3	\$1,350	\$405	com's with RLS re DeMello declaration; draft brief re motion for subclasses	Class Certification
10/12/2023	Guy Wallace	1.4	\$1,350	\$1,890	review and analysis of potential edits to draft brief re motion for subclasses	Class Certification
10/12/2023	Guy Wallace	1.8	\$1,350	\$2,430	com's with PK; LP; Bedi re preparation of Kennedy declaration re motion for subclasses	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/12/2023	Guy Wallace	1.1	\$1,350	\$1,485	zoom with Waters; Mastin; MTJ; JAU; TCC re preparation of declarations re motion for subclasses; revisions to facility reports	Class Certification
10/12/2023	Guy Wallace	0.4	\$1,350	\$540	com's with BU re preparation of Flores; Jones declarations re motion for subclasses	Class Certification
10/12/2023	Jennifer Bybee	4.8	\$925	\$4,440	Review expert reports for barriers to remove; mark up same	Class Certification
10/12/2023	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re expert reports	Class Certification
10/12/2023	Jennifer Bybee	1.1	\$925	\$1,018	Conference call with GBW, MTJ, TCC, G. Waters & J. Mastin re barrier inspection spreadsheets.	Class Certification
10/12/2023	Jennifer Bybee	0.8	\$925	\$740	Review expert reports with GBW re suggested barriers to remove	Class Certification
10/12/2023	Mark Johnson	1.1	\$1,150	\$1,265	video mtg w/ experts Mastin and Waters and w/ G Wallace, T Close and J Bybee re revisions to existing reports for submission with declarations iso of mtn for subclasses.	Class Certification
10/12/2023	Mark Johnson	0.8	\$1,150	\$920	call w Patrick Kennedy, Lindsay Petite, G Wallace and B Umpierre re Kennedy expert declaration iso mtn for certification of Community Fee subclass.	Class Certification
10/12/2023	Mark Johnson	1.5	\$1,150	\$1,725	drive to Brookdale San Ramon and return for meeting w/ client S Stiner and to get signature on declaration iso mtn for leave to file mtn for certification of subclasses.	Class Certification
10/12/2023	Mark Johnson	0.3	\$1,150	\$345	mtg w/ client Stacia Stiner at San Ramon Brookdale to review and get signature on declaration iso mtn for leave to file mtn for class certification.	Class Certification
10/12/2023	Mark Johnson	0.8	\$1,150	\$920	review RBGG edits to draft mtn for leave to file mtn to certify subclasses	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/12/2023	Mark Johnson	0.6	\$1,150	\$690	calls (x3) w/ G Wallace re discussion w/ damages expert, market survey; retention of new expert for same	Class Certification
10/12/2023	Mark Johnson	0.4	\$1,150	\$460	calls w/ R Bonner re status of community fee document analysis, his mtg w/ K Marquis re review protocol and quality control audit, declaration re same	Class Certification
10/12/2023	Mark Johnson	0.3	\$1,150	\$345	email exchanges w/ J Bybee and T Close re comparison of Waters Expert reports with 4AC barrier list, questions re what was included on 4AC list	Class Certification
10/12/2023	Mark Johnson	0.4	\$1,150	\$460	review notes from relative of Tracy resident and work on declaration from same	Class Certification
10/12/2023	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re timing of service alignment and impact on arguments, by Plaintiff	Class Certification
10/12/2023	Rachel Steyer	0.3	\$750	\$225	reviewing JSY edits to GBW draft MCC	Other Motions
10/12/2023	Rachel Steyer	1.1	\$750	\$825	reviewing draft GBW declaration circulated by BBK	Other Motions
10/12/2023	Rachel Steyer	2.5	\$750	\$1,875	reviewing draft GBW MCC brief/motion	Other Motions
10/12/2023	Travis Close	0.7	\$850	\$595	Legal research on whether quoting from testimony in attorney declarations constitutes improper argument	Case Organization, Planning and Strategy
10/12/2023	Travis Close	0.4	\$850	\$340	Review, analyze, and propose revisions for draft Wallace decl. iso class cert	Class Certification
10/12/2023	Travis Close	0.3	\$850	\$255	email to jeff mastin re: instructions for analysis/QA of expert reports for named plaintiff facilities	Class Certification
10/12/2023	Travis Close	1.1	\$850	\$935	Meeting with GBW, JUB, MTJ, JM, GW re: export report review & QA before next week's filing	Class Certification
10/12/2023	Travis Close	1.8	\$850	\$1,530	Analyze & verify inclusion of plaintiff and class members' rooms in master barrier spreadsheet	Pleadings and Motions Re: Pleadings
10/12/2023	Travis Close	0.3	\$850	\$255	Email to MTJ re: Stacia's temporary stay in room 2207	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/12/2023	Travis Close	0.2	\$850	\$170	Email to JUB re: inclusion of room 445 in barrier report at Scotts Valley	Pleadings and Motions Re: Pleadings
10/12/2023	Travis Close	0.3	\$850	\$255	Email to RLS re: thoughts about inconsistent evidence on pltf's medical diagnoses	Pleadings and Motions Re: Pleadings
10/12/2023	Travis Close	0.4	\$850	\$340	Addition of barriers in room 2207 to master barrier spreadsheet	Pleadings and Motions Re: Pleadings
10/13/2023	Guy Wallace	1.2	\$1,350	\$1,620	revise and edit motion draft Wallace Declaration re motion for subclasses	Class Certification
10/13/2023	Guy Wallace	2.7	\$1,350	\$3,645	revise and edit draft declaration of Waters re motion for subclasses	Class Certification
10/13/2023	Guy Wallace	0.5	\$1,350	\$675	com's with PK; LP; SB re preparation of Bedi declaration re motion for subclasses	Class Certification
10/13/2023	Guy Wallace	2.2	\$1,350	\$2,970	revise and edit draft of motion for subclasses; com's with AX re same (.2)	Class Certification
10/13/2023	Guy Wallace	0.5	\$1,350	\$675	com's with JAU re revisions to facility reports for the six facilities	Class Certification
10/13/2023	Guy Wallace	0.5	\$1,350	\$675	revise and edit draft Mastin declaration re motion for subclasses	Class Certification
10/13/2023	Guy Wallace	0.8	\$1,350	\$1,080	zoom with JY; BBK; AX; KS; BU; MTJ; JAU; TCC; RLS re preparation of motion re subclasses	Class Certification
10/13/2023	Guy Wallace	0.3	\$1,350	\$405	revise and edit draft declaration of DeMello re motion for subclasses	Class Certification
10/13/2023	Jennifer Bybee	0.4	\$925	\$370	Edit and revise Mastin Brookhursts report	Class Certification
10/13/2023	Jennifer Bybee	0.7	\$925	\$648	Review and edit expert report re Brookdale San Ramon	Class Certification
10/13/2023	Jennifer Bybee	0.1	\$925	\$93	Email to J. Mastin re door closing speed language	Class Certification
10/13/2023	Jennifer Bybee	0.4	\$925	\$370	Edit and revise Brookdale Tracy expert report	Class Certification
10/13/2023	Jennifer Bybee	0.2	\$925	\$185	Edit and revise expert report for Scotts Valley	Class Certification
10/13/2023	Jennifer Bybee	0.7	\$925	\$648	Edit and revise Brookdale Hemet and Fountaingrove expert reports	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/13/2023	Jennifer Bybee	0.1	\$925	\$93	Email to GBW re review expert reports	Class Certification
10/13/2023	Jennifer Bybee	0.4	\$925	\$370	Com's with GBW re expert reports and suggested barriers to remove	Class Certification
10/13/2023	Jennifer Bybee	0.8	\$925	\$740	Edit and revise expert reports	Class Certification
10/13/2023	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re suggested barriers for removal from expert reports	Class Certification
10/13/2023	Jennifer Bybee	0.1	\$925	\$93	Email to G. Waters & J. Mastin re adding measurements to reports	Class Certification
10/13/2023	Mark Johnson	0.2	\$1,150	\$230	review G Wallace edits to draft Waters dec iso mtn for certification of subclasses	Class Certification
10/13/2023	Mark Johnson	0.8	\$1,150	\$920	check-in zoom mtg with COC Wallace, Xu, Yelin, Bien-Kahn, Bybee, Close, Steyer, Umpierre and paralegals Stilber and Edmundson re status of all docs and tasks for filing mtn for leave to file mtn for certification of subclasses.	Class Certification
10/13/2023	Mark Johnson	2.9	\$1,150	\$3,335	review, edit and add comments, questions to latest version of draft mtn for leave to move for certification of subclasses.	Class Certification
10/13/2023	Mark Johnson	0.2	\$1,150	\$230	call and follow up text messages w/ potential class rep	Class Certification
10/13/2023	Mark Johnson	1.0	\$1,150	\$1,150	zoom mtg w/ Wallace, Marks, Thornton, Umpierre re evidence and expert declarations of Jones, Schroyer, Belson and Flores for mtn for leave to file mtn iso class certification of subclasses.	Class Certification
10/13/2023	Mark Johnson	2.8	\$1,150	\$3,220	review notes and draft declarations for potential class representatives; coms w/ G Wallace re same	Class Certification
10/13/2023	Mark Johnson	0.2	\$1,150	\$230	email exchanges w/ R Bonner re status of community fee document analysis, projection for completion, overtime need for weekend work	Class Certification
10/13/2023	Mark Johnson	0.4	\$1,150	\$460	calls w/ GBW re retention of potential class reps	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/13/2023	Mark Johnson	0.1	\$1,150	\$115	review order approving stip re 4AC and email to L Castro re filing same	Pleadings and Motions Re: Pleadings
10/13/2023	Rachel Steyer	0.8	\$750	\$600	meeting with RBGG, GBW, TCC, MTJ reviewing tasks and assignments for brief	Case Organization, Planning and Strategy
10/13/2023	Rachel Steyer	0.2	\$750	\$150	call with Wendy DeMello to review and further discuss visual impairment questions	Class Outreach and Contact
10/13/2023	Rachel Steyer	2.5	\$750	\$1,875	preparing and combining declaration appendix	Other Motions
10/13/2023	Rachel Steyer	0.4	\$750	\$300	reviewing draft MCC order	Other Motions
10/13/2023	Rachel Steyer	0.5	\$750	\$375	call with Wendy DeMello to review extent of visual impairments	Other Motions
10/13/2023	Rachel Steyer	0.4	\$750	\$300	call with GBW to discuss addition of Wendy DeMello	Other Motions
10/13/2023	Rachel Steyer	0.5	\$750	\$375	drafting supplemental Wendy DeMello declaration	Other Motions
10/13/2023	Travis Close	0.2	\$850	\$170	Email to architectural experts re: question about compatibility of CBC and ADAAG codes regarding door swinging provisions	Case Organization, Planning and Strategy
10/13/2023	Travis Close	0.4	\$850	\$340	Review and analyze filed version of amended complaint & exhibits for unintended errors	Case Organization, Planning and Strategy
10/13/2023	Travis Close	1.8	\$850	\$1,530	Analyze CBC code provisions cited in expert reports' for six facilities to determine accuracy with ADA corresponding provisions	Class Certification
10/13/2023	Travis Close	0.4	\$850	\$340	Review, analyze, and propose revisions for draft proposed order granting subclasses	Class Certification
10/13/2023	Travis Close	1.4	\$850	\$1,190	Research cases discussing door swinging barriers under the CBC vs. ADAAG/ADAS	Class Certification
10/13/2023	Travis Close	0.8	\$850	\$680	Meeting with team & co-counsel re: filing checklist for class cert motion, plans for appeal, amended complaint, etc.	Class Certification
10/14/2023	Guy Wallace	1.0	\$1,350	\$1,350	com's with Waters; JAU re facility reports, revisions thereto to eliminate barriers; dimensional tolerances items	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/14/2023	Guy Wallace	1.2	\$1,350	\$1,620	revise and edit draft motion re certification of subclasses	Class Certification
10/14/2023	Guy Wallace	1.1	\$1,350	\$1,485	revise and edit draft Mastin declaration re motion for certification of subclasses	Class Certification
10/14/2023	Guy Wallace	1.7	\$1,350	\$2,295	revise and edit motion for certification of subclasses; argument re overpayment and recent decisions re same	Class Certification
10/14/2023	Guy Wallace	0.7	\$1,350	\$945	review and analysis of MJ Beeler Order re benchmark formula; revise and edit discovery letter re same	Other Motions
10/14/2023	Jennifer Bybee	0.1	\$925	\$93	Review emails from G. Waters and J. Mastin re barrier lists	Class Certification
10/14/2023	Jennifer Bybee	2.4	\$925	\$2,220	Review and create redline edit of Mtn for Certification of Subclasses	Class Certification
10/14/2023	Jennifer Bybee	0.5	\$925	\$463	Com's with GBW re proposed barriers to remove from expert report	Class Certification
10/14/2023	Jennifer Bybee	0.3	\$925	\$278	Edit and revise Fountaingrove and Hemet expert reports	Class Certification
10/15/2023	Guy Wallace	6.2	\$1,350	\$8,370	revise and edit motion for certification of subclasses; incorporation of proposed edits from RBGG; MTJ; JAU	Class Certification
10/15/2023	Guy Wallace	0.4	\$1,350	\$540	com's with BU re preparation of motion for subclasses	Class Certification
10/15/2023	Guy Wallace	0.8	\$1,350	\$1,080	com's with MTJ re narrowing subclass definition re consumer fraud claims; named P's and standing	Class Certification
10/15/2023	Mark Johnson	0.5	\$1,150	\$575	call with proposed declarant, plaintiff and class rep; read and discuss draft declaration	Class Certification
10/15/2023	Mark Johnson	0.3	\$1,150	\$345	revise declaration of potential class rep and send to her via email with cover; make additional edits and print for signature	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/15/2023	Mark Johnson	3.3	\$1,150	\$3,795	research and draft memo re timing of service alignment implementation, facts bearing on same; move in dates for named Plaintiffs and ramifications	Class Certification
10/15/2023	Mark Johnson	0.4	\$1,150	\$460	update chart of named Plaintiffs' facts re vision disabilities, move in/move out dates, payment of community fees.	Class Certification
10/15/2023	Mark Johnson	0.2	\$1,150	\$230	draft cover email to G Wallace for memo re SA implementation and Plaintiff fact chart with summary of same and implications	Class Certification
10/15/2023	Mark Johnson	0.7	\$1,150	\$805	draft responses to multiple emails from G Wallace re results of analysis of implementation dates of SA Benchmarks and plaintiff move in dates, implications of same and strategies for addressing	Class Certification
10/15/2023	Mark Johnson	0.3	\$1,150	\$345	research status of named plaintiffs when they joined the case; draft email to G Wallace re same	Class Certification
10/15/2023	Mark Johnson	0.4	\$1,150	\$460	review D opposition on the issue of pre-2017 period where some facilities were not using SA; draft email to G Wallace re results of same and quotations from opp, and Bowman declaration and attach same	Class Certification
10/16/2023	Guy Wallace	1.7	\$1,350	\$2,295	revise and edit draft motion for subclasses	Class Certification
10/16/2023	Guy Wallace	0.8	\$1,350	\$1,080	revise and edit draft brief re motion for subclasses; proposed class definitions; statement of facts	Class Certification
10/16/2023	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re motion for certification of subclasses	Class Certification
10/16/2023	Guy Wallace	0.8	\$1,350	\$1,080	revise and edit draft declaration of DeMello; com's with RLS re same; review and analysis of San Ramon facility report	Class Certification
10/16/2023	Guy Wallace	0.3	\$1,350	\$405	com's with BU re SA data and declarations of Belson and Jones	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/16/2023	Guy Wallace	0.8	\$1,350	\$1,080	com's with Dr. Bedi; TCC re preparation of declaration re motion to certify subclasses and pertinent documents re Community Fees	Class Certification
10/16/2023	Guy Wallace	0.5	\$1,350	\$675	com's with Waters; MTJ; JAU re facility reports and revisions thereto	Class Certification
10/16/2023	Guy Wallace	0.9	\$1,350	\$1,215	prepare for and participate in tc with RLS re preparation of statement of facts; revisions thereto; Appendix of Declarations; Steyer Declaration	Class Certification
10/16/2023	Guy Wallace	3.6	\$1,350	\$4,860	review and analysis of district court opinion re class certification; preparation of additional points re draft of motion for subclasses; com's with CJH; BU; MTJ re same (1.1)	Class Certification
10/16/2023	Guy Wallace	2.1	\$1,350	\$2,835	revise and edit motion for certification of subclasses	Class Certification
10/16/2023	Jennifer Bybee	0.4	\$925	\$370	Edit and revise Fountaingrove expert report	Class Certification
10/16/2023	Jennifer Bybee	0.1	\$925	\$93	Email com's with G. Waters and J. Mastin re editing reports	Class Certification
10/16/2023	Jennifer Bybee	1.3	\$925	\$1,203	Finalize Tracy expert report and email same to J. Mastin	Class Certification
10/16/2023	Jennifer Bybee	1.7	\$925	\$1,573	Finalize Scotts Valley expert report and email same to J. Mastin	Class Certification
10/16/2023	Jennifer Bybee	0.2	\$925	\$185	Com's with J. Mastin re expert reports	Class Certification
10/16/2023	Jennifer Bybee	0.6	\$925	\$555	Edit and revise San Ramon expert report	Class Certification
10/16/2023	Mark Johnson	3.0	\$1,150	\$3,450	drive to and from potential class rep house in Mateca for meeting and signature on declaration	Class Certification
10/16/2023	Mark Johnson	0.5	\$1,150	\$575	meeting with potential class rep for Tracy mobility disability subclass	Class Certification
10/16/2023	Mark Johnson	0.3	\$1,150	\$345	review and respond to G Waters email re San Ramon and Fountaingrove construction dates and applicable CBC, Anderson findings re same; review Anderson declaration re that issue for response	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/16/2023	Mark Johnson	0.2	\$1,150	\$230	review and respond to emails from R Bonner and K Marquis re status of community fee analysis, Marquis declaration; review Marquis comments re declaration.	Class Certification
10/16/2023	Mark Johnson	0.8	\$1,150	\$920	review and make edits to draft sample retainer agreement for potential Tracy Mobility subclass representative; email to G Wallace re same with explanation for changes	Class Certification
10/16/2023	Mark Johnson	0.7	\$1,150	\$805	calls (x5) w/ G Wallace re gathering information for expert Bedi, Margie declaration, revisions to Mastin/Waters reports, arguments re Kennedy damages model and similarity to Sunrise model; D's comparison of Kennedy opinions in Sunrise to opinions in Brookdale; Sunrise 28(j) submissions.	Class Certification
10/16/2023	Mark Johnson	0.1	\$1,150	\$115	email and call w/ R Bonner re status of Community Fee analysis at EOD and issues w/ Marquis declaration.	Class Certification
10/16/2023	Mark Johnson	0.6	\$1,150	\$690	pull and 28(j) letters in Sunrise appeal and review for discussion re Kennedy damages model and similarity to Brookdale model; draft email to G Wallace re same.	Class Certification
10/16/2023	Mark Johnson	0.9	\$1,150	\$1,035	begin review of new draft of brief iso certification of subclasses; insert record cites to Margie and Stiner declarations; highlight areas for cites to Waters, Mastin and Marquis declarations; email G Wallace re same.	Class Certification
10/16/2023	Mark Johnson	0.8	\$1,150	\$920	review proposed edits to P section of joint discovery brief re benchmark formula and integrate some of same, final review and edits to letter; draft cover email to OC with same	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/16/2023	Rachel Steyer	0.6	\$750	\$450	call with Wendy DeMello to review additional details of visual impairments	Class Outreach and Contact
10/16/2023	Rachel Steyer	0.4	\$750	\$300	reviewing and editing draft MTJ MTC discovery letter brief re benchmark formula	Discovery (Non-Deposition)
10/16/2023	Rachel Steyer	0.2	\$750	\$150	reviewing BBK declaration and enclosed exhibit chart	Other Motions
10/16/2023	Rachel Steyer	0.2	\$750	\$150	call with GBW to review and discuss Wendy DeMello draft declaration	Other Motions
10/16/2023	Rachel Steyer	0.4	\$750	\$300	call with GBW to review and discuss cite checks in brief	Other Motions
10/16/2023	Rachel Steyer	0.2	\$750	\$150	reviewing additional plaintiff declaration circulated by MTJ	Other Motions
10/16/2023	Rachel Steyer	3.4	\$750	\$2,550	inserting declaration cites into brief and updating/reviewing declaration tables/appendix	Other Motions
10/16/2023	Travis Close	0.8	\$850	\$680	Analyze evidence of community fee data at facilities at which the six named plaintiffs resided	Case Organization, Planning and Strategy
10/16/2023	Travis Close	0.4	\$850	\$340	Call with GBW re: materials needed to assist Dr Bedi	Class Certification
10/16/2023	Travis Close	1.6	\$850	\$1,360	Legal research re: whether online marketing materials raise individualized questions re: misrepresentation	Class Certification
10/16/2023	Travis Close	1.4	\$850	\$1,190	Review and analyze marketing materials produced that explain the community fee paid by residents	Discovery (Non-Deposition)
10/16/2023	Travis Close	1.7	\$850	\$1,445	Review and analyze corporate documents that explain the purpose & strategy for pricing community fees	Discovery (Non-Deposition)
10/16/2023	Travis Close	0.2	\$850	\$170	Email to Dr. Bedi re: relevant community fee documents to review	Experts (Including Retention)
10/17/2023	Guy Wallace	2.1	\$1,350	\$2,835	revise and edit draft brief re motion for subclasses; sections re consumer fraud claims	Class Certification
10/17/2023	Guy Wallace	3.3	\$1,350	\$4,455	revise and edit draft motion for certification of subclasses	Class Certification
10/17/2023	Guy Wallace	0.5	\$1,350	\$675	revise and edit draft of brief re motion for subclasses	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/17/2023	Guy Wallace	1.4	\$1,350	\$1,890	revise and edit Waters declaration re motion for subclasses; com's with Waters; MTJ re same	Class Certification
10/17/2023	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of draft Kennedy declaration	Class Certification
10/17/2023	Guy Wallace	0.8	\$1,350	\$1,080	com's with PK; LP; SB; BU; MTJ; TCC re draft Bedi declaration; draft Kennedy declaration re motion for subclasses	Class Certification
10/17/2023	Guy Wallace	1.2	\$1,350	\$1,620	com's with BU; MTJ re damages model	Class Certification
10/17/2023	Guy Wallace	0.5	\$1,350	\$675	review and analysis of draft Marquis declaration re Community Fees	Class Certification
10/17/2023	Guy Wallace	1.1	\$1,350	\$1,485	revise and edit draft of Steyer declaration re subclasses motion; com's with RLS re same	Class Certification
10/17/2023	Guy Wallace	1.1	\$1,350	\$1,485	revise and edit Mastin declaration re motion for subclasses	Class Certification
10/17/2023	Guy Wallace	1.3	\$1,350	\$1,755	revise and edit draft Kennedy declaration re motion for subclasses; com's with BU; MTJ re same	Class Certification
10/17/2023	Guy Wallace	0.5	\$1,350	\$675	review and analysis of declaration of Dr. Jones re motion for subclasses	Class Certification
10/17/2023	Jennifer Bybee	0.7	\$925	\$648	Edit and finalize San Ramon expert report; email same to J. Mastin	Class Certification
10/17/2023	Jennifer Bybee	4.5	\$925	\$4,163	Incorporate J. Mastin edits into Hemet expert report; email same to MTJ and J. Mastin	Class Certification
10/17/2023	Jennifer Bybee	0.7	\$925	\$648	Zoom meeting with co-counsel re status update on MCC re subclasses	Class Certification
10/17/2023	Jennifer Bybee	1.2	\$925	\$1,110	Finalize Fountaingrove report and email same to MTJ and J. Mastin	Class Certification
10/17/2023	Mark Johnson	0.7	\$1,150	\$805	team zoom mtg w/ Yelin, Grunfeld, Wallace, Bybee, Bien-Kahn, Edmundson, Steyer, Close, Stilber re status of tasks and components of mtn to certify subclasses,	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/17/2023	Rachel Steyer	0.8	\$750	\$600	meeting with GBW, TCC, MTJ, JUB, and RBGG co-counsel to review task list and assignments in preparation for filing	Case Organization, Planning and Strategy
10/17/2023	Rachel Steyer	0.3	\$750	\$225	reviewing and completing adding in declaration cites to brief	Other Motions
10/17/2023	Rachel Steyer	0.2	\$750	\$150	call with GBW to review declaration citations added to brief	Other Motions
10/17/2023	Rachel Steyer	0.4	\$750	\$300	fixing additional cite changes into brief	Other Motions
10/17/2023	Rachel Steyer	0.3	\$750	\$225	call with GBW to review and discuss brief cites	Other Motions
10/17/2023	Rachel Steyer	0.2	\$750	\$150	response to GBW concerning language in brief and declarations	Other Motions
10/17/2023	Travis Close	0.8	\$850	\$680	Meeting with co-counsel and team re: update on progress of items to file for class cert motion	Case Organization, Planning and Strategy
10/17/2023	Travis Close	1.4	\$850	\$1,190	Legal research on proper procedure for filing when judge has not issued ruling on motion to extend page limits of brief	Class Certification
10/17/2023	Travis Close	0.5	\$850	\$425	Review and analyze signed declarations for heather fischer, ralph carlson, and joan carlson, for inadvertent errors	Class Certification
10/17/2023	Travis Close	0.6	\$850	\$510	Review and analyze photosets to be attached to six facility reports or accuracy	Class Certification
10/17/2023	Travis Close	0.4	\$850	\$340	Review and analyze draft Decl. of Dr. Bedi iso class cert for consistency of language re: understaffing	Class Certification
10/17/2023	Travis Close	0.9	\$850	\$765	Meeting with experts Kennedy, Bedi, & MTJ/GBW/BMU re: alignment of experts' analysis and brief finalization	Class Certification
10/17/2023	Travis Close	0.4	\$850	\$340	Review and analyze revised version of Wallace declaration with new exhibits	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/17/2023	Travis Close	1.1	\$850	\$935	Review and analyze updated facility evaluation reports and complaint investigation reports issued by DSS for Riverwalk, Chatsworth, Santa Monica, Central Whittier, Irvine, Brookhurst, Auburn, Sylvan Ranch, Oceanside, Tracy, and Lodi facilities	Discovery (Non-Deposition)
10/17/2023	Travis Close	0.8	\$850	\$680	Research academic articles related to consumer preferences published by Dr. Bedi	Experts (Including Retention)
10/17/2023	Travis Close	0.2	\$850	\$170	Email to Dr. Bedi re: proposed meeting this afternoon re declaration	Experts (Including Retention)
10/18/2023	Guy Wallace	0.5	\$1,350	\$675	revise and edit declaration of Dr. Jones re motion for subclasses	Class Certification
10/18/2023	Guy Wallace	2.8	\$1,350	\$3,780	revise and edit discussion of damages model and injury; com's with PK; BU; MTJ; RLS re same	Class Certification
10/18/2023	Guy Wallace	3.4	\$1,350	\$4,590	review and analysis of draft declarations from Dr. Kennedy and Dr. Bedi; revise and edit same; com's with PK; SB; LP; BU; MTJ re same (1.1)	Class Certification
10/18/2023	Guy Wallace	0.5	\$1,350	\$675	zoom with JY; BBK; KS; BU; MTJ; RLS re preparation of motion to certify subclasses	Class Certification
10/18/2023	Guy Wallace	0.6	\$1,350	\$810	review and analysis of proposed order re motion to certify subclasses; com's with BBK re same	Class Certification
10/18/2023	Guy Wallace	0.7	\$1,350	\$945	legal research and analysis re whether a conjoint analysis must be completed prior to class certification	Class Certification
10/18/2023	Guy Wallace	3.1	\$1,350	\$4,185	revise and edit draft brief and Kennedy declaration re motion for subclasses	Class Certification
10/18/2023	Jennifer Bybee	0.2	\$925	\$185	Finalize Fountaingrove; email same to MTJ and GBW	Class Certification
10/18/2023	Jennifer Bybee	0.2	\$925	\$185	Incorporate J. Mastin edits into Hemet report; email same to J. Mastin & MTJ	Class Certification
10/18/2023	Jennifer Bybee	1.0	\$925	\$925	Input J. Mastin edits into Brookdale Brookhurst report	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/18/2023	Jennifer Bybee	0.7	\$925	\$648	Final review of Brookdale Brookhurst; email same to GBW, MTJ & J. Mastin	Class Certification
10/18/2023	Jennifer Bybee	0.4	\$925	\$370	Input J. Mastin edits into Tracy report	Class Certification
10/18/2023	Jennifer Bybee	0.6	\$925	\$555	Final review of Tracy expert report; email same to GBW, MTJ, J. Mastin	Class Certification
10/18/2023	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re status update	Class Certification
10/18/2023	Jennifer Bybee	0.1	\$925	\$93	Email J. Mastin updated versions of 3 reports for final sign off	Class Certification
10/18/2023	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re Clemens research	Class Certification
10/18/2023	Jennifer Bybee	0.1	\$925	\$93	Email to J. Mastin re room types	Class Certification
10/18/2023	Jennifer Bybee	1.6	\$925	\$1,480	Research re whether Clemens is still good law	Class Certification
10/18/2023	Jennifer Bybee	0.3	\$925	\$278	Email finalized expert reports (Tracy, Fountaingrove, Brookhurst) to RBGG	Class Certification
10/18/2023	Jennifer Bybee	0.3	\$925	\$278	Input J. Mastin edits into Scotts Valley expert report	Class Certification
10/18/2023	Jennifer Bybee	0.5	\$925	\$463	Review Scotts Valley report; finalize and email same to RBGG	Class Certification
10/18/2023	Jennifer Bybee	0.6	\$925	\$555	Research whether Martinez-Mendoza is still good law / whether anything similar from Ninth Circuit	Class Certification
10/18/2023	Mark Johnson	1.5	\$1,150	\$1,725	review new version of brief and re-insert record citations and related edits for Declarations of Waters, Mastin, Stiner, Margie and Marquis; email G Wallace re same.	Class Certification
10/18/2023	Mark Johnson	0.0	\$1,150	\$0	review and comment on draft proposed order for certification of subclasses	Class Certification
10/18/2023	Mark Johnson	2.5	\$1,150	\$2,875	review revised versions of 4 access expert reports from J Bybee and J Mastin, email coms with both re revisions and inclusion or omission of certain entries and format issues; call w/ J Bybee re same	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/18/2023	Mark Johnson	0.6	\$1,150	\$690	Zoom team mtg to review progress and status of each document to be included in filing of mtn for leave to seek certification of subclasses	Class Certification
10/18/2023	Mark Johnson	0.5	\$1,150	\$575	zoom call with Wallace, Umpierre, Kennedy, Petite, Bedi and Close re Kennedy and Bedi declarations iso mtn for leave to seek certification of subclasses; evidence supporting same.	Class Certification
10/18/2023	Mark Johnson	2.8	\$1,150	\$3,220	research doc management database, depo exhibits and depo testimony re Algarme community fees and documents supporting D's electronic tracking of payment of community fees and discounts or waivers.	Class Certification
10/18/2023	Mark Johnson	1.0	\$1,150	\$1,150	email and phone coms w/ K Marquis re dec iso subclass mtn; emails w/ R Bonner re same; review and finalize dec, with exhibits based on same; email co-counsel re same	Class Certification
10/18/2023	Mark Johnson	0.1	\$1,150	\$115	com w/ potential class rep Denise Margie	Class Certification
10/18/2023	Mark Johnson	0.6	\$1,150	\$690	review revised section of brief iso subclass certification on damages, inferences re same and expert testimony supporting same; review subsequent revisions to same and to draft Kennedy declarations and coms w/ COC re same.	Class Certification
10/18/2023	Mark Johnson	0.5	\$1,150	\$575	draft emails to co-counsel and damages describing, analyzing and attaching documents establishing Defendant's electronic tracking of payment of community fees and waivers/discounts of same.	Class Certification
10/18/2023	Mark Johnson	0.2	\$1,150	\$230	email exchange w/ Wallace, Bien-kahn and other co-counsel confirming move-in dates of named plaintiffs and eligibility to be class reps for proposed fraud class based on 9/17 start date for class definition; review complaint and move in chart for same.	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/18/2023	Mark Johnson	0.2	\$1,150	\$230	review emails from M Jacobsen to Judge Beeler's clerk re standing order and clerk's response; review April 2023 version of standing order.	Discovery (Non-Deposition)
10/18/2023	Rachel Steyer	0.5	\$750	\$375	looking for account summary history document for MTJ	Discovery (Non-Deposition)
10/18/2023	Rachel Steyer	0.3	\$750	\$225	call with GBW to discuss and review brief and declaraiton citations	Other Motions
10/18/2023	Rachel Steyer	0.4	\$750	\$300	updating and revising declaration to incorporate and reflect brief citations	Other Motions
10/18/2023	Rachel Steyer	0.2	\$750	\$150	reviewing Marquis declaration circulated by MTJ	Other Motions
10/18/2023	Rachel Steyer	0.2	\$750	\$150	preparing and combining signed Wendy DeMello declarations	Other Motions
10/18/2023	Travis Close	1.4	\$850	\$1,190	Legal research on conjoint analysis surveys for cases alleging understaffing	Case Organization, Planning and Strategy
10/18/2023	Travis Close	1.4	\$850	\$1,190	Research definition of visual impairment for purposes of ADA & Cal DSS regulations	Class Certification
10/18/2023	Travis Close	1.6	\$850	\$1,360	Analysis of visual v. mobility barriers at named plaintiff facilities	Class Certification
10/18/2023	Travis Close	0.2	\$850	\$170	Email to BMU re: definition of visual impairment	Class Certification
10/18/2023	Travis Close	0.5	\$850	\$425	Review and analyze final declaration of Jeff Mastin for inadvertent errors	Class Certification
10/18/2023	Travis Close	0.4	\$850	\$340	Review and analyze final draft of declaration of Gary Waters for inadvertent errors	Class Certification
10/18/2023	Travis Close	0.5	\$850	\$425	Review and analyze revised draft declaration of Dr. Bedi iso class cert, to check new language re: system of staffing, for accuracy to plaintiffs' claims	Class Certification
10/18/2023	Travis Close	0.9	\$850	\$765	Research Laurel Beeler's standing orders & local civil rules governing consolidation of discovery issues for joint letter brief	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/19/2023	Guy Wallace	4.2	\$1,350	\$5,670	revise and edit brief re motion for certification of subclasses	Class Certification
10/19/2023	Guy Wallace	4.3	\$1,350	\$5,805	revise and edit Plaintiffs' motion for subclasses	Class Certification
10/19/2023	Jennifer Bybee	0.2	\$925	\$185	Zoom meeting with co-counsel re status update on docs for filing	Class Certification
10/19/2023	Jennifer Bybee	1.3	\$925	\$1,203	Research whether cases similar to Martinez- Mendoza in 9th Circuit	Class Certification
10/19/2023	Jennifer Bybee	0.4	\$925	\$370	Input J. Mastin edits into San Ramon report	Class Certification
10/19/2023	Jennifer Bybee	1.3	\$925	\$1,203	Finalize San Ramon barrier report	Class Certification
10/19/2023	Jennifer Bybee	0.9	\$925	\$833	Finalize Hemet expert report for filing	Class Certification
10/19/2023	Jennifer Bybee	0.4	\$925	\$370	Finalize and organize expert reports for filing	Class Certification
10/19/2023	Jennifer Bybee	0.1	\$925	\$93	Com's with MTJ re Mastin edits to Waters reports	Class Certification
10/19/2023	Jennifer Bybee	0.1	\$925	\$93	Email to G. Waters re approval to file	Class Certification
10/19/2023	Jennifer Bybee	0.1	\$925	\$93	Email to K. Stilber, J. Yelin, MTJ and GBW re Mastin's final reports for filing	Class Certification
10/19/2023	Mark Johnson	7.0	\$1,150	\$8,050	work on finalizing brief iso class certification; reviewing expert reports, coms w/ COC re same	Class Certification
10/19/2023	Mark Johnson	0.2	\$1,150	\$230	review and respond to email from co-counsel re joint discovery letter and clerk's "directive" and re enlargement of page limit for opposition to subclass motion.	Discovery (Non-Deposition)
10/19/2023	Rachel Steyer	0.4	\$750	\$300	finalizing edits and updates to RLS declaration	Other Motions
10/19/2023	Rachel Steyer	0.6	\$750	\$450	reviewing and inserting declaration cites, checking cites to declaration	Other Motions
10/19/2023	Rachel Steyer	0.4	\$750	\$300	reviewing draft order circulated by BBK	Other Motions
10/19/2023	Rachel Steyer	1.5	\$750	\$1,125	reviewing Belsen declaration ISO motion for subclasses	Other Motions
10/19/2023	Rachel Steyer	0.2	\$750	\$150	call with GBW to review brief cite checks	Other Motions
10/19/2023	Travis Close	0.5	\$850	\$425	Review and analyze draft declaration of RLS for accuracy/inadvertent errors	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/19/2023	Travis Close	0.5	\$850	\$425	Review and analyze final version of Flores declaration & exhibits	Case Organization, Planning and Strategy
10/19/2023	Travis Close	1.9	\$850	\$1,615	Add cites to plaintiffs' declarations to class cert brief	Class Certification
10/19/2023	Travis Close	0.3	\$850	\$255	Call to MTJ re: splitting up work for citation additions to class cert brief	Class Certification
10/19/2023	Travis Close	1.2	\$850	\$1,020	Draft list of evidence considered for Dr. Suneal Bedi	Class Certification
10/19/2023	Travis Close	0.6	\$850	\$510	Analysis of marketing materials re: service alignment & representations in Wallace declaration	Class Certification
10/19/2023	Travis Close	0.5	\$850	\$425	Apply revisions by BBK re: cite checks from BBK/Wallace declarations to class cert brief	Class Certification
10/19/2023	Travis Close	0.5	\$850	\$425	Review and analyze final draft declaration of Patrick Kennedy iso certification of subclasses	Class Certification
10/19/2023	Travis Close	0.6	\$850	\$510	Review and analyze updated draft of Dr. Bedi declaration iso class cert, including discussion on conjoint analysis	Experts (Including Retention)
10/19/2023	Travis Close	0.2	\$850	\$170	Email to team re: plaintiffs' cites in class cert brief	Pleadings and Motions Re: Pleadings
10/20/2023	Guy Wallace	1.5	\$1,350	\$2,025	legal research and analysis re Lytle v. Nutramax; Ninth Circuit oral argument re same and issues re conjoint analysis	Class Certification
10/20/2023	Guy Wallace	0.5	\$1,350	\$675	com's with BU; MTJ re Defendant's data and records re assessments; arbitration opt-out records; further expert analysis	Misc. Research
10/20/2023	Guy Wallace	1.2	\$1,350	\$1,620	review and analysis of Defendants' notice of intent to file motion to strike; com's with GG; BU; MTJ re same	Other Motions
10/20/2023	Rachel Steyer	0.9	\$750	\$675	compiling list of declarants who moved in post 2017	Misc. Research
10/20/2023	Rachel Steyer	0.2	\$750	\$150	reviewing defendants' motion to strike	Other Motions
10/20/2023	Travis Close	0.4	\$850	\$340	Review and analyze Def's notice of motion to strike & supporting exhibits	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/20/2023	Travis Close	1.4	\$850	\$1,190	Legal research on cases where sanctions were issued after motion to certify sub-classes	Case Organization, Planning and Strategy
10/20/2023	Travis Close	1.8	\$850	\$1,530	Analysis of filed version of motion for certification of subclasses for redaction consistency & inadvertent errors	Class Certification
10/23/2023	Guy Wallace	0.8	\$1,350	\$1,080	com's with Rutner; GG; BU; MTJ; JAU re Defendants' motion to strike; motion for expedited briefing schedule; analysis of same	Other Motions
10/23/2023	Jennifer Bybee	0.8	\$925	\$740	Review Motion to Strike	Class Certification
10/23/2023	Jennifer Bybee	0.1	\$925	\$93	Review Motion for Sanctions	Class Certification
10/23/2023	Rachel Steyer	5.0	\$750	\$3,750	preparing depo summary for Heather Fisher	Depositions
10/23/2023	Rachel Steyer	0.3	\$750	\$225	reviewing defendants' sanctions motion and admin motion to shorten briefing schedule	Other Motions
10/24/2023	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of Defendants' motion to strike	Other Motions
10/24/2023	Guy Wallace	2.8	\$1,350	\$3,780	legal research and analysis re class certification and motions for reconsideration; motions re subclasses and narrower definitions	Other Motions
10/24/2023	Guy Wallace	2.3	\$1,350	\$3,105	review and analysis of Defendants' motion to strike motion re subclasses; motion for sanctions; administrative motion re schedule	Other Motions
10/24/2023	Guy Wallace	1.1	\$1,350	\$1,485	com's with GG; BU; MTJ; JAU re Defendants' motion to strike motion re subclasses and motions for sanctions; preparation of oppositions re same	Other Motions
10/24/2023	Guy Wallace	0.6	\$1,350	\$810	com's with Rutner; MTJ re schedule on Defendants' motion to strike	Other Motions
10/24/2023	Jennifer Bybee	0.3	\$925	\$278	Com's with GBW re Motion to Strike and Motion for Sanctions	Class Certification
10/24/2023	Mark Johnson	0.6	\$1,150	\$690	call w/ G Wallace to discuss D mtn to strike mtn for subclasses and mtn for sanctions and proposed alternative to mtn for shortening time.	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/24/2023	Mark Johnson	1.7	\$1,150	\$1,955	review and analyze D's mtns to strike portions of mtn for subclass, mtn for sanctions and mtn to shorten time.	Other Motions
10/24/2023	Rachel Steyer	3.9	\$750	\$2,925	completing depo summary for Heather Fisher	Depositions
10/24/2023	Rachel Steyer	2.1	\$750	\$1,575	working on Jestrabek-Hart depo summary	Depositions
10/25/2023	Guy Wallace	0.5	\$1,350	\$675	com's with Rutner; MTJ re schedule on Defendants' motion to strike and schedule re same; review and analysis of Defendants' proposed stipulation re same	Other Motions
10/25/2023	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ re response to Defendants' motion to shorten time; opposition to motion to strike	Other Motions
10/25/2023	Guy Wallace	0.7	\$1,350	\$945	review and analysis of Defendants' Admin Motion re shortening time; Declaration of Rutner re same	Other Motions
10/25/2023	Mark Johnson	3.8	\$1,150	\$4,370	draft opposition to mtn to shorten time for opposing mtn to strike mtn for leave fo file subclass mtng; com w/ GBW re same.	Other Motions
10/25/2023	Rachel Steyer	6.9	\$750	\$5,175	preparing Bernie Jestrabek-Hart depo summary	Depositions
10/25/2023	Travis Close	0.3	\$850	\$255	Review and analyze draft stipulation re: extension of time to respond to sealing motion	Case Organization, Planning and Strategy
10/25/2023	Travis Close	0.5	\$850	\$425	Review and analyze recently issued facility evaluation reports & complaint investigation reports issued for Tracy and Scotts Valley facilities	Discovery (Non-Deposition)
10/25/2023	Travis Close	0.5	\$850	\$425	Review and analyze Defendants' admin motion to shorten time of response & attached declarations/exhibits	Other Motions
10/25/2023	Travis Close	0.6	\$850	\$510	Review and analyze Defendants' motion to strike	Other Motions
10/25/2023	Travis Close	0.3	\$850	\$255	Review and analyze defendants' notice of motion and motion for sanctions	Other Motions
10/25/2023	Travis Close	1.3	\$850	\$1,105	Legal research on discretion to award sanctions based on local rules 7-8 and 7-9	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/25/2023	Travis Close	1.7	\$850	\$1,445	Legal research on discretion to award sanctions based on court's "inherent authority"	Other Motions
10/25/2023	Travis Close	0.8	\$850	\$680	Legal research on cases where issues of sanctions was examined in context of repetitive arguments	Other Motions
10/26/2023	Guy Wallace	2.6	\$1,350	\$3,510	preparation of oppositions to Defendants' motion to strike; motion to shorten time	Other Motions
10/26/2023	Guy Wallace	3.4	\$1,350	\$4,590	legal research and analysis re Defendants' arguments in MTS that motion re subclasses is improper	Other Motions
10/26/2023	Guy Wallace	1.4	\$1,350	\$1,890	revise and edit draft opposition to Defendants' administrative motion re shortening time on the motion to strike and declaration of MTJ re same; com's with MTJ re same	Other Motions
10/26/2023	Guy Wallace	3.1	\$1,350	\$4,185	review and analysis of Defendants' motion to strike; preparation of detailed outline of opposition re same	Other Motions
10/26/2023	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re opposition to motion to strike	Other Motions
10/26/2023	Mark Johnson	1.8	\$1,150	\$2,070	review and further revise drafts of opp to mtn to shorten time, supporting declaration and proposed order; com w/ LEC and GBW re same	Other Motions
10/26/2023	Mark Johnson	1.0	\$1,150	\$1,150	draft supporting declaration for opp to mtn to shorten time. for opp to mtn to strike	Other Motions
10/26/2023	Mark Johnson	0.2	\$1,150	\$230	review and draft response to OC Rutner re possible stip adjusting briefing schedule on mtn for leave to file subclass mnt as alternative to shorten time on mtn to strike.	Other Motions
10/26/2023	Rachel Steyer	5.8	\$750	\$4,350	preparing depo summary for Patricia Lindstrom	Depositions
10/26/2023	Rachel Steyer	0.4	\$750	\$300	reviewing draft MTJ declaration and Plaintiffs' response re motions to shorten briefing schedule	Other Motions
10/26/2023	Rachel Steyer	0.2	\$750	\$150	reviewing plaintiffs' admin motion to seal papers	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/26/2023	Travis Close	0.4	\$850	\$340	Review, analyze, and propose revisions for declaration of MTJ iso Opposition to motion to shorten time	Case Organization, Planning and Strategy
10/26/2023	Travis Close	0.2	\$850	\$170	Email to LEC re: assistance with opposition to motion to shorten time to respond	Case Organization, Planning and Strategy
10/26/2023	Travis Close	1.5	\$850	\$1,275	Research evidence of Brookdale's financial requirements/covenants to maintain liquidity at named plaintiff facilities	Case Organization, Planning and Strategy
10/26/2023	Travis Close	1.7	\$850	\$1,445	Analysis of capital spending plans for future five years at named plaintiff facilities related to accessibility improvements	Case Organization, Planning and Strategy
10/26/2023	Travis Close	1.3	\$850	\$1,105	Legal research on FRCP and N.D. Ca. civil local rules regarding procedure seeking to re-certify claims for subclasses	Class Certification
10/26/2023	Travis Close	0.7	\$850	\$595	Review, analyze, and revise draft opposition to motion to shorten length of time for response on motion to strike	Other Motions
10/27/2023	Guy Wallace	1.1	\$1,350	\$1,485	revise and edit opposition to Defendants' motion to shorten time; com's with MTJ re same	Other Motions
10/27/2023	Guy Wallace	2.6	\$1,350	\$3,510	preparation of detailed outline of opposition to motion to strike; com's with BU re same (.4)	Other Motions
10/27/2023	Mark Johnson	0.4	\$1,150	\$460	review proposes stipulation and revised proposed stipulation re enlargement of page limitations for opp and reply to mtn for leave to file mtn for subclasses; coms x3 w/ OC re same and proposed revisions; com w/ GBW re same.	Pleadings and Motions Re: Pleadings
10/27/2023	Rachel Steyer	2.4	\$750	\$1,800	working on depo summary for Michele Lytle	Depositions
10/27/2023	Rachel Steyer	1.7	\$750	\$1,275	reviewing and comparing D's answer to FAC vs. TAC, highlighting differences	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/27/2023	Rachel Steyer	0.2	\$750	\$150	response to GBW and TCC sharing Ds answer to FAC with highlighted differences	Other Motions
10/27/2023	Travis Close	2.1	\$850	\$1,785	Analyze & summarize depo testimony from EDs regarding readily achievable barrier removal at plaintiffs' facilities	Case Organization, Planning and Strategy
10/27/2023	Travis Close	0.2	\$850	\$170	Review and analyze co-counsel's edits to opposition to motion to strike	Case Organization, Planning and Strategy
10/27/2023	Travis Close	1.6	\$850	\$1,360	Compare Ds' Answer to 4AC with Answer to 3AC and note changes/revisions made throughout (Paragraphs 159-end of affirmative defenses	Pleadings and Motions Re: Pleadings
10/28/2023	Guy Wallace	4.8	\$1,350	\$6,480	preparation and drafting of detailed outline re opposition to Defendants' motion to strike; legal research and analysis re same	Other Motions
10/28/2023	Guy Wallace	2.4	\$1,350	\$3,240	preparation and drafting of argument re Plaintiffs are permitted to make a further motion to propose narrower subclasses	Other Motions
10/28/2023	Jennifer Bybee	3.1	\$925	\$2,868	Research parties get multiple attempts at class certification	Class Certification
10/29/2023	Guy Wallace	4.1	\$1,350	\$5,535	preparation of arguments re standards on motions to strike; Rule 12(f); legal research and analysis re same; revise and edit detailed outline of opposition to Defendants' motion to strike subclasses motion	Other Motions
10/29/2023	Guy Wallace	1.1	\$1,350	\$1,485	legal research and analysis re standards on motions that propose narrower classes or subclasses	Other Motions
10/29/2023	Jennifer Bybee	0.8	\$925	\$740	Draft email memo re research findings re more than one chance at class certification	Class Certification
10/30/2023	Guy Wallace	0.5	\$1,350	\$675	com's with JAU re preparation of opposition to motion to strike	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/30/2023	Guy Wallace	0.1	\$1,350	\$135	com's with TCC re legal research re conjoint analyses and whether they are necessary to show classwide damages	Other Motions
10/30/2023	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ re preparation of opposition to motion to strike; conjoint analyses	Other Motions
10/30/2023	Guy Wallace	3.4	\$1,350	\$4,590	preparation of detailed outline of opposition to motion to strike; legal research and analysis re same, including analysis of cases re further motions for certification of subclasses; motions for reconsideration	Other Motions
10/30/2023	Guy Wallace	3.7	\$1,350	\$4,995	preparation and drafting of opposition to motion to strike; com's with BU; JAU re same (.8)	Other Motions
10/30/2023	Jennifer Bybee	0.4	\$925	\$370	Review briefing and research question re standard for motion to strike	Class Certification
10/30/2023	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re conjoint analysis research	Class Certification
10/30/2023	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re motion to strike research	Class Certification
10/30/2023	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re outline and conjoint analysis	Class Certification
10/30/2023	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re court order re subclasses	Class Certification
10/30/2023	Jennifer Bybee	3.3	\$925	\$3,053	Review cases cited by Defendants are motion to strike	Other Motions
10/30/2023	Jennifer Bybee	0.7	\$925	\$648	Review court orders re motion for leave	Other Motions
10/30/2023	Jennifer Bybee	0.5	\$925	\$463	Draft section re MTS	Other Motions
10/30/2023	Rachel Steyer	0.5	\$750	\$375	call with Brookdale declarant to provide case status update	Class Outreach and Contact
10/30/2023	Rachel Steyer	2.3	\$750	\$1,725	completing depo summary of Michele Lytle	Depositions
10/30/2023	Rachel Steyer	0.3	\$750	\$225	reviewing two draft outlines of P's opposition to Ds motion to strike circulated by GBW	Other Motions
10/30/2023	Rachel Steyer	0.4	\$750	\$300	reviewing defendants' objections to plaintiffs' rule 34 inspection notice	Other Motions
10/30/2023	Travis Close	0.2	\$850	\$170	Email to GBW re: conjoint analysis research	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/30/2023	Travis Close	0.8	\$850	\$680	Legal research on ninth circuit cases finding that consumer survey was required to prove deception	Case Organization, Planning and Strategy
10/30/2023	Travis Close	2.3	\$850	\$1,955	Legal research on whether ninth circuit requires conjoint analysis to determine deception under UCL	Class Certification
10/30/2023	Travis Close	1.9	\$850	\$1,615	Perform analysis of evidence used for prevailing on motions for class cert or MSJ to show deception under UCL	Class Outreach and Contact
10/30/2023	Travis Close	0.4	\$850	\$340	Review and analyze Def's objections to notice of site inspections	Discovery (Non-Deposition)
10/31/2023	Guy Wallace	1.5	\$1,350	\$2,025	preparation and drafting of opposition to Defendants' motion to strike	Other Motions
10/31/2023	Guy Wallace	2.9	\$1,350	\$3,915	preparation and drafting of opposition to motion to strike; com's with BU; MTJ; TCC re same (.7)	Other Motions
10/31/2023	Guy Wallace	3.4	\$1,350	\$4,590	preparation and drafting of opposition to Defendants' motion to strike	Other Motions
10/31/2023	Guy Wallace	1.9	\$1,350	\$2,565	preparation and drafting of motion re standards that apply to successive motions for certification re narrowed classes or subclasses	Other Motions
10/31/2023	Jennifer Bybee	2.1	\$925	\$1,943	Draft section of Opposition to MTS re MTS standard	Other Motions
10/31/2023	Mark Johnson	0.3	\$1,150	\$345	email and GTM conference w/ J Thornton re expert docs produced to Defendants in connection with decs iso mtn for leave to file mtn to certify subclasses.	Class Certification
10/31/2023	Mark Johnson	0.7	\$1,150	\$805	review revised spreadsheet from R Bonner with tabulations for residency agreements produced, opt-outs; Gather and add information re facility capacities.	Class Certification
10/31/2023	Mark Johnson	0.2	\$1,150	\$230	email coms w/ GBW re Residency Agreements and census.	Class Certification
10/31/2023	Mark Johnson	0.3	\$1,150	\$345	review and draft response to email from OC J Bertino re alleged failure to produce expert materials related to mtn for leave to file mtn to certify subclasses.	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/31/2023	Mark Johnson	0.4	\$1,150	\$460	review additional expert spreadsheets with Weekly DLRs from Thornton; draft email to OC Bertino re production of same.	Class Certification
10/31/2023	Mark Johnson	0.3	\$1,150	\$345	review and draft response to email from OC to Judge Beeler's courtroom deputy re discovery procedure; com w/ G Wallace re same.	Discovery (Non-Deposition)
10/31/2023	Mark Johnson	1.5	\$1,150	\$1,725	review and compare theories / allegations of 4th amended complaint, and arguments / theories of mtn for leave to file mtn for certification of subclasses; draft memo/chart with analysis of same; com w/ G Wallace re same.	Other Motions
10/31/2023	Rachel Steyer	5.0	\$750	\$3,750	completing Stacia Stiner depo summary	Depositions
10/31/2023	Travis Close	2.3	\$850	\$1,955	Legal research re: Ninth Circuit cases applying Comcast re: showing damages in consumer law class actions	Case Organization, Planning and Strategy
10/31/2023	Travis Close	1.6	\$850	\$1,360	Legal research on cases requiring conjoint analysis to demonstrate damages for predominance	Case Organization, Planning and Strategy
10/31/2023	Travis Close	0.4	\$850	\$340	Review and analyze recent facility evaluation and complaint investigation reports issued for Chanate, Lodi, Kettleman Lane, and Diablo Lodge facilities	Case Organization, Planning and Strategy
11/1/2023	Guy Wallace	2.9	\$1,350	\$3,915	preparation and drafting of opposition to Defendants' motion to strike	Other Motions
11/1/2023	Guy Wallace	1.6	\$1,350	\$2,160	preparation and drafting of introduction to opposition to Defendants' motion to strike	Other Motions
11/1/2023	Guy Wallace	4.6	\$1,350	\$6,210	preparation and drafting of initial draft of opposition to motion to strike; incorporation and editing of sections from BU; JAU; com's with MTJ; BU; JAU re same (.8)	Other Motions
11/1/2023	Jennifer Bybee	0.7	\$925	\$648	Draft section re MTS Standard	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/1/2023	Mark Johnson	5.0	\$1,150	\$5,750	work on opposition to mtn to strike portions of motion for leave to seek certification of subclasses, including review of cases, prior pleadings and declarations, edits to GBW draft.	Class Certification
11/1/2023	Mark Johnson	0.1	\$1,150	\$115	review email from clerk and follow up w/ email to OC re joint letter brief concerning benchmark formula	Discovery (Non-Deposition)
11/1/2023	Mark Johnson	0.2	\$1,150	\$230	email exchange w/ G Waters re site inspection schedule and Ds objections to inspections	Experts (Including Retention)
11/1/2023	Rachel Steyer	6.0	\$750	\$4,500	legal reasearch for opp to MTS	Other Motions
11/1/2023	Rachel Steyer	1.0	\$750	\$750	reviewing draft opposition to MTS	Other Motions
11/1/2023	Travis Close	2.2	\$850	\$1,870	Draft outline of memo re: whether conjoint analysis is required to prove damages	Case Organization, Planning and Strategy
11/1/2023	Travis Close	1.3	\$850	\$1,105	Continue drafting memo re: conjoint analyses and consumer damages (standard of review)	Case Organization, Planning and Strategy
11/1/2023	Travis Close	0.2	\$850	\$170	Email to team sharing memo re: conjoint analyses	Case Organization, Planning and Strategy
11/1/2023	Travis Close	1.6	\$850	\$1,360	Legal research on recent ninth circuit decisions citing & interpreting Comcast v. Behrend	Class Certification
11/1/2023	Travis Close	1.8	\$850	\$1,530	Continue drafting memo re: conjoint analyses and consumer damages (sufficient evidence section)	Discovery (Non-Deposition)
11/2/2023	Guy Wallace	0.9	\$1,350	\$1,215	preparation and drafting of opposition to motion to strike	Other Motions
11/2/2023	Guy Wallace	3.4	\$1,350	\$4,590	revise and edit draft opposition to motion to strike; com's with JAU re same (.5)	Other Motions
11/2/2023	Guy Wallace	1.3	\$1,350	\$1,755	review and analysis of Daubert motion from the Bright case re Dr. Bedi; com's with MTJ re same	Other Motions
11/2/2023	Jennifer Bybee	3.4	\$925	\$3,145	Create redline edit of Opp. to MTS	Other Motions
11/2/2023	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re edits to MTS	Other Motions
11/2/2023	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re theory of damages	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/2/2023	Rachel Steyer	6.0	\$750	\$4,500	ongoing legal research for plaintiffs' opposition to defendants' motion to strike	Other Motions
11/2/2023	Rachel Steyer	0.2	\$750	\$150	reviewing and comparing two versions of draft opposition to MTS	Other Motions
11/2/2023	Travis Close	0.8	\$850	\$680	Review and analyze latest ver of draft opposition to Defendants' motion to strike	Case Organization, Planning and Strategy
11/2/2023	Travis Close	2.3	\$850	\$1,955	Legal research on recent cases finding that economic injury satisfies Article III standing	Case Organization, Planning and Strategy
11/2/2023	Travis Close	1.6	\$850	\$1,360	Legal research on cases where court found quantification of injuries was not required at class certification stage	Case Organization, Planning and Strategy
11/2/2023	Travis Close	1.9	\$850	\$1,615	Legal research on cases finding that material omissions give rise to liability under CLRA, UCL and/or EFA	Discovery (Non-Deposition)
11/2/2023	Travis Close	0.8	\$850	\$680	Edits to draft opposition to motion to strike	Discovery (Non-Deposition)
11/3/2023	Guy Wallace	3.2	\$1,350	\$4,320	review and analysis of opposition to motion to strike; revise and edit same	Other Motions
11/3/2023	Guy Wallace	2.8	\$1,350	\$3,780	revise and edit opposition to motion to strike	Other Motions
11/3/2023	Jennifer Bybee	3.4	\$925	\$3,145	Prepare redline edit of Opposition to MTS	Other Motions
11/3/2023	Jennifer Bybee	0.7	\$925	\$648	Conference call with co-counsel re Opposition to MTS, Opposition to Motion for Sanctions, etc.	Other Motions
11/3/2023	Rachel Steyer	0.7	\$750	\$525	zoom with RBGG and GBW, MTJ, JUB re planning for response ot motion to strike and opposition to sanctions	Case Organization, Planning and Strategy
11/3/2023	Rachel Steyer	0.2	\$750	\$150	transmitting additional authority to GBW for opposition to motion to strike	Misc. Research
11/3/2023	Rachel Steyer	0.5	\$750	\$375	reviewing draft plaintiffs' opp to defs' motion for sanctions	Other Motions
11/3/2023	Rachel Steyer	0.2	\$750	\$150	reviewing RBGG comments and edits to opposition	Other Motions
11/3/2023	Rachel Steyer	1.2	\$750	\$900	research for additional authority for opposition to motion to strike	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/3/2023	Travis Close	0.8	\$850	\$680	Further edits to draft opposition to motion to strike	Case Organization, Planning and Strategy
11/3/2023	Travis Close	0.3	\$850	\$255	Review and analyze edits by co-counsel to draft opposition to motion to strike	Case Organization, Planning and Strategy
11/3/2023	Travis Close	0.9	\$850	\$765	Research cases where parties were sanctioned based on court's "inherent authority" in Ninth circuit	Case Organization, Planning and Strategy
11/3/2023	Travis Close	0.7	\$850	\$595	Team meeting re: opposition to motion to strike, opposing motion for sanctions, & inspections	Case Organization, Planning and Strategy
11/3/2023	Travis Close	0.7	\$850	\$595	Research cases discussing quantification of damages under elder financial abuse act	Case Organization, Planning and Strategy
11/3/2023	Travis Close	0.7	\$850	\$595	Review and analyze draft opposition to motion for sanctions	Pleadings and Motions Re: Pleadings
11/4/2023	Guy Wallace	4.8	\$1,350	\$6,480	revise and edit opposition to motion to strike; com's with BU; MTJ; JAU re same (.4)	Other Motions
11/5/2023	Guy Wallace	1.7	\$1,350	\$2,295	review and analysis of Bedi declaration; issues re what is necessary for the design at the class certification stage; legal research and analysis re same	Misc. Research
11/5/2023	Guy Wallace	3.8	\$1,350	\$5,130	review and analysis of further draft of opposition to motion to strike; revise and edit same	Other Motions
11/5/2023	Guy Wallace	1.2	\$1,350	\$1,620	revise and edit further draft of opposition to Defendants' motion to strike; include proposed edits from RBGG and BU; com's with BU and JAU re same	Other Motions
11/5/2023	Guy Wallace	0.7	\$1,350	\$945	review and analysis of draft opposition to Defendants' motion for sanctions; com's with GG; MTJ; JAU re same	Other Motions
11/5/2023	Jennifer Bybee	1.6	\$925	\$1,480	Review and edit Opp to MTS	Other Motions
11/6/2023	Guy Wallace	1.1	\$1,350	\$1,485	analysis of Ninth Circuit oral argument in Davis v. Labs. Corp. case; com's with RLS re same	Misc. Research

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/6/2023	Guy Wallace	2.7	\$1,350	\$3,645	revise and edit further draft of opposition to motion to strike; com's with GG; JY; BBK; AX; BU; MTJ; JAU re same (1.1)	Other Motions
11/6/2023	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of revisions to opposition to motion to strike re issues of sealing or redaction; com's with JY; BU re same	Other Motions
11/6/2023	Guy Wallace	1.3	\$1,350	\$1,755	finalize opposition to motion to strike and preparation of filing of same	Other Motions
11/6/2023	Jennifer Bybee	0.8	\$925	\$740	Edit and cite check Opp to MTS	Other Motions
11/6/2023	Jennifer Bybee	0.1	\$925	\$93	Search for unredacted declarations	Other Motions
11/6/2023	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW and B. Umpierre re Statement of the Issue	Other Motions
11/6/2023	Jennifer Bybee	0.3	\$925	\$278	Incorporate edits into Opp. to MTS	Other Motions
11/6/2023	Jennifer Bybee	0.3	\$925	\$278	Conference call with co-counsel re filing	Other Motions
11/6/2023	Mark Johnson	0.4	\$1,150	\$460	review email and attachment from J Thornton re additional expert disclosure for mtn for leave to file mtn seeking subclass certification; draft email to OC re same	Class Certification
11/6/2023	Mark Johnson	4.0	\$1,150	\$4,600	pull and begin reviewing docs from Bright case involving Daubert challenge to Dr. Suneal Bedi; start drafting outline of arguments and criticisms of report, compare report to declaration	Class Certification
11/6/2023	Mark Johnson	0.6	\$1,150	\$690	calls and email exchanges w/ G Wallace re opp to mtn to strike mtn for leave, conjoint analysis expert declaration and arguments re sufficiency of same, planning rebuttal to same.	Class Certification
11/6/2023	Mark Johnson	1.3	\$1,150	\$1,495	review of latest version of opposition to mtn to strike mtn for leave to file mtn for certification of subclasses; com w/ G Wallace and J Bybee re same.	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/6/2023	Mark Johnson	1.0	\$1,150	\$1,150	review revised draft of opposition to mtn for sanctions for filing mtn for leave to seek certification of subclasses	Other Motions
11/6/2023	Mark Johnson	0.3	\$1,150	\$345	team zoom mtg w/ Wallace, Grunfeld, Yelin, Close, Xu, Bybee, Steyer, Bien-Kahn, Umpierre re finalization of opposition to mtn to strike and opposition to mtn for sanctions	Other Motions
11/6/2023	Mark Johnson	0.6	\$1,150	\$690	research for prior emails re expert disclosures for fact citation in opp to mtn to strike mtn for leave to seek subclasses; email coms w/ J Bybee and B Umpierre re same.	Other Motions
11/6/2023	Rachel Steyer	0.2	\$750	\$150	zoom meeting with RBGG cocounsel and GBW, TCC, MTJ, JUB to review and discuss last minute items before filing motions	Case Organization, Planning and Strategy
11/6/2023	Rachel Steyer	0.2	\$750	\$150	reviewing updated version of plaintiffs' opposition to MTS as circulated by GBW	Other Motions
11/6/2023	Travis Close	1.3	\$850	\$1,105	Analyze status of redactions for plaintiffs' experts' reports in Admin motion to seal & verify completion in public record	Case Organization, Planning and Strategy
11/6/2023	Travis Close	0.8	\$850	\$680	Research dates of move out for Jeannette Algarme at Brookhurst facility	Case Organization, Planning and Strategy
11/6/2023	Travis Close	0.2	\$850	\$170	Team meeting with MTJ, GBW, RLS, and co-counsel re: today's filings of motion to strike and motion for sanctions	Case Organization, Planning and Strategy
11/6/2023	Travis Close	0.2	\$850	\$170	Review and analyze edits to opposition motion to section on Dr Jones made by BMU	Case Organization, Planning and Strategy
11/6/2023	Travis Close	0.9	\$850	\$765	Research dates of facility move-outs for Ralph Schmidt and Aurthur Lindstrom	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/6/2023	Travis Close	1.3	\$850	\$1,105	Review & analyze prior communications with defendants in past 3 months re: threats or hints at sanctions	Pleadings and Motions Re: Pleadings
11/6/2023	Travis Close	0.4	\$850	\$340	Review and analyze latest draft of opposition to motion to strike & recent edits made by GBW	Pleadings and Motions Re: Pleadings
11/7/2023	Guy Wallace	1.5	\$1,350	\$2,025	preparation of issues and points to be addressed in Plaintiffs' reply re motion for subclasses	Class Certification
11/7/2023	Guy Wallace	1.3	\$1,350	\$1,755	review and analysis of declaration of Dr. Bedi; com's with MTJ re same and Dr. Bedi's declaration in Bright case	Class Certification
11/7/2023	Guy Wallace	1.7	\$1,350	\$2,295	legal research and analysis re issues re injury-in-fact, and whether analysis of injury-in-fact to putative class members properly includes analysis of their claims on the merits and the amount of damages that they have incurred; com's with MTJ and RLS re same	Class Certification
11/7/2023	Mark Johnson	1.0	\$1,150	\$1,150	calls w/ G Wallace re strategy and research on addressing D's criticism of damages experts and proposed conjoint survey	Class Certification
11/7/2023	Mark Johnson	0.5	\$1,150	\$575	review and respond to email from B Umpierre re expert disclosures related to class certification and prior meet and confer; review prior correspondence and response to document requests re expert opinions	Class Certification
11/7/2023	Mark Johnson	4.0	\$1,150	\$4,600	review and summarize cases discussing Choice Based conjoint analyses.	Class Certification
11/7/2023	Mark Johnson	2.0	\$1,150	\$2,300	review and compare S Bedi declarations in Bright and Stiner	Class Certification
11/7/2023	Mark Johnson	1.0	\$1,150	\$1,150	review Brookdale Daubert mtn to strike Bedi declaration in Bright v Brookdale and complete summary of critique of same.	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/7/2023	Rachel Steyer	0.4	\$750	\$300	call with GBW to review and discuss outlines of standing research	Misc. Research
11/7/2023	Rachel Steyer	2.0	\$750	\$1,500	reviewing full motion for leave to file motion for certification of subclasses	Other Motions
11/7/2023	Travis Close	0.9	\$850	\$765	Review and analyze filed versions of motion to strike & motion for sanctions to spot any inadvertent errors	Case Organization, Planning and Strategy
11/7/2023	Travis Close	0.5	\$850	\$425	Review and analyze recent facility evaluation and complaint investigation reports issued for Diablo Lodge, Ocean House, Sylvan Ranch, Place of San Marcos, and Scotts Valley facilities	Case Organization, Planning and Strategy
11/8/2023	Guy Wallace	2.8	\$1,350	\$3,780	legal research and analysis re standards for showing classwide injury or damages at the class certification stage; review and analysis of district court's decision re same	Class Certification
11/8/2023	Guy Wallace	3.4	\$1,350	\$4,590	legal research and analysis re standards re evidence that is "capable of" showing injury and damages; district court interpretations of standards set forth by the Ninth Circuit in Olean	Class Certification
11/8/2023	Guy Wallace	2.0	\$1,350	\$2,700	review and analysis of district court opinion re evidence of overpayment; com's with PK re same (Bedi conjoint analysis); com's with MTJ; JAU; TCC; RLS re same	Misc. Research
11/8/2023	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re evidence of overpayment	Other Motions
11/8/2023	Mark Johnson	0.5	\$1,150	\$575	GTM conference w B Umpierre and J Thornton re production of expert files and data, responding to OC email re same.	Class Certification
11/8/2023	Mark Johnson	0.9	\$1,150	\$1,035	calls w/ G Wallace re Bedi declaration, conjoint analyses, arguments anticipated by Ds re same and responses, case law on what is required to be shown	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/8/2023	Mark Johnson	2.5	\$1,150	\$2,875	further legal research and review of cases re conjoint analysis and necessary showing in expert reports for class certification stage and Daubert, including case identified by T Close	Class Certification
11/8/2023	Mark Johnson	1.8	\$1,150	\$2,070	further review and comparison of Bedi declaration with Bedi Report in Bright v Brookdale	Class Certification
11/8/2023	Mark Johnson	0.3	\$1,150	\$345	follow up emails w/ R Bonner re preparation of expert docs for production related to class cert / subclass cert; draft emails to OC Bertino transmitting same.	Class Certification
11/8/2023	Mark Johnson	0.5	\$1,150	\$575	draft email to J Bertino and other OC re production of expert materials, research re same.	Experts (Including Retention)
11/8/2023	Rachel Steyer	0.4	\$750	\$300	reviewing portions of class cert. opinion as directed by GBW for legal research	Class Certification
11/8/2023	Rachel Steyer	0.7	\$750	\$525	legal research re standing, damages analysis, injury, class cert, evidentiary proof issues	Misc. Research
11/8/2023	Travis Close	1.6	\$850	\$1,360	legal research on whether experts can assume truth of pltf's liability in conducting dmgs model	Case Organization, Planning and Strategy
11/8/2023	Travis Close	1.7	\$850	\$1,445	legal research on whether evidence of overpayment is required at class cert stage	Case Organization, Planning and Strategy
11/8/2023	Travis Close	0.4	\$850	\$340	email to team re: opinion on evidence sufficient for dmg models of overpayment	Case Organization, Planning and Strategy
11/8/2023	Travis Close	1.2	\$850	\$1,020	legal research on materiality of representations based on state regs requiring same conduct	Case Organization, Planning and Strategy
11/8/2023	Travis Close	1.5	\$850	\$1,275	Draft analysis of evidence required to show overpayment at class cert stage	Case Organization, Planning and Strategy
11/9/2023	Guy Wallace	4.4	\$1,350	\$5,940	preparation of notes re points and authorities re Article III injury and classwide injury; classwide damages; conjoint analysis	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/9/2023	Guy Wallace	0.8	\$1,350	\$1,080	com's with MTJ; JAU; TCC re legal research re cases cited in district court opinion re class certification; Olean; conjoint analysis cases; standards re classwide damages	Class Certification
11/9/2023	Guy Wallace	3.3	\$1,350	\$4,455	review and analysis of Defendants' opposition to motion for subclasses; com's with MTJ re same	Class Certification
11/9/2023	Jennifer Bybee	0.2	\$925	\$185	Review emails from GBW, MTJ, TCC re evidence of overpayment	Class Certification
11/9/2023	Jennifer Bybee	0.6	\$925	\$555	Review Flynn v. FCA; email GBW re same	Class Certification
11/9/2023	Jennifer Bybee	0.6	\$925	\$555	Review Sonneveldt and emails re same	Class Certification
11/9/2023	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re Flynn and Earl	Class Certification
11/9/2023	Jennifer Bybee	0.5	\$925	\$463	Draft paragraph re Flynn	Class Certification
11/9/2023	Jennifer Bybee	0.2	\$925	\$185	Finalize paragraph on Flynn and email same to GBW	Class Certification
11/9/2023	Jennifer Bybee	0.8	\$925	\$740	Review Earl; email GBW re same	Class Certification
11/9/2023	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re conjoint analysis	Class Certification
11/9/2023	Jennifer Bybee	1.4	\$925	\$1,295	Review Opposition to Motion for Leave	Class Certification
11/9/2023	Mark Johnson	1.7	\$1,150	\$1,955	review and analyze Ds opposition to mtn for leave to file mtn to certify subclasses	Class Certification
11/9/2023	Mark Johnson	0.9	\$1,150	\$1,035	call w/ G Wallace re opp to mtn for leave to file mtn for subclasses, arguments made, responses to same.	Class Certification
11/9/2023	Mark Johnson	0.8	\$1,150	\$920	further call w/ G Wallace re next steps in responding to opp to mtn for leave to file subclasses.	Class Certification
11/9/2023	Mark Johnson	0.7	\$1,150	\$805	review Saad and Jacobsen declarations iso opp to mtn for leave to file mtn for subclasses	Class Certification
11/9/2023	Mark Johnson	0.6	\$1,150	\$690	calls (x3) w/ G Wallace re cases on conjoint analysis, proof of classwide injury at class cert stage	Class Certification
11/9/2023	Mark Johnson	6.3	\$1,150	\$7,245	further research and review of cases re conjoint surveys, adequacy of design, pre-testing, consideration of supply side factors; prepare notes and memo re same.	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/9/2023	Mark Johnson	0.2	\$1,150	\$230	review drafts of argument from T Close re damages models and assumption of theory of liability.	Class Certification
11/9/2023	Rachel Steyer	2.5	\$750	\$1,875	reading and reviewing defendants opposition papers	Other Motions
11/9/2023	Travis Close	1.2	\$850	\$1,020	Draft analysis to team summarizing case findings rebutting Judge's points about improper assumptions	Case Organization, Planning and Strategy
11/9/2023	Travis Close	1.3	\$850	\$1,105	Draft analysis to team re: evidence required in damages models prior to class certification	Case Organization, Planning and Strategy
11/9/2023	Travis Close	0.9	\$850	\$765	Review and analyze defendants' Daubert motion to exclude testimony of Dr. Bedi in related case (Gunza v. Brookdale) & reply brief iso same	Case Organization, Planning and Strategy
11/9/2023	Travis Close	2.3	\$850	\$1,955	Draft memo analyzing cases cited in motion to exclude testimony of Dr. Bedi (Bright v. Brookdale) re: extent of survey design necessary at class cert stage	Case Organization, Planning and Strategy
11/9/2023	Travis Close	2.1	\$850	\$1,785	Legal research on cases cited in motion to exclude testimony of Dr. Bedi (Bright v. Brookdale) for accuracy towards argument that surveys must be fully designed at class cert stage	Case Organization, Planning and Strategy
11/10/2023	Guy Wallace	4.5	\$1,350	\$6,075	review and analysis of Defendants' opposition to subclasses motion	Class Certification
11/10/2023	Guy Wallace	0.7	\$1,350	\$945	zoom with JY; BU; MTJ; JAU; RLS re preparation of reply papers re motion for subclasses	Class Certification
11/10/2023	Guy Wallace	1.2	\$1,350	\$1,620	com's with BU; MTJ; JAU; RLS re preparation of reply re motion for subclasses; issues re "new" evidence; alleged burden re same and purported impact on the schedule; schedule re reply papers	Class Certification
11/10/2023	Guy Wallace	2.7	\$1,350	\$3,645	review and analysis of Defendants' opposition brief re subclasses; preparation of counterpoints and issues for follow up re same	Class Certification
11/10/2023	Jennifer Bybee	0.8	\$925	\$740	Conference call with co-counsel re reply brief	Class Certification
11/10/2023	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re opposition brief	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/10/2023	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re reply brief	Class Certification
11/10/2023	Mark Johnson	0.8	\$1,150	\$920	zoom mtg w/ J Yellin, G Wallace, B Umpierre, R Steyer, Jen Bybee, Adrienne Spiegel re D opposition to subclass mtn and strategy, allocation of work for responding to same.	Class Certification
11/10/2023	Rachel Steyer	0.8	\$750	\$600	zoom with JSY, GBW, MTJ, BU to review and discuss tasks and assignments for reply brief	Case Organization, Planning and Strategy
11/10/2023	Rachel Steyer	0.6	\$750	\$450	searching for Anderson docs to determine facilities inspected	Discovery (Non-Deposition)
11/11/2023	Guy Wallace	4.1	\$1,350	\$5,535	review and analysis of Defendants' opposition to motion for subclasses; preparation of counterpoints; com's with MTJ; JAU re same (.5)	Class Certification
11/11/2023	Guy Wallace	2.1	\$1,350	\$2,835	preparation of preliminary outline of reply brief re motion for subclasses	Class Certification
11/12/2023	Guy Wallace	1.9	\$1,350	\$2,565	review and analysis of Defendants' arguments re futility and Plaintiffs' motion for subclasses	Class Certification
11/12/2023	Guy Wallace	3.6	\$1,350	\$4,860	preparation and drafting of list of responsive points re Defendants' opposition arguments	Class Certification
11/13/2023	Guy Wallace	3.6	\$1,350	\$4,860	preparation of reply points re Defendants' opposition re motion for subclasses; legal research and analysis re same including injury and material omissions	Class Certification
11/13/2023	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ; BU re Defendants' claims re production of 396 GB's	Class Certification
11/13/2023	Guy Wallace	0.4	\$1,350	\$540	com's with JAU re Defendants' arguments re standards on successive motions regarding class certification	Class Certification
11/13/2023	Guy Wallace	1.3	\$1,350	\$1,755	review and analysis of draft administrative motion re schedule on reply for subclasses motion; revise and edit same; review of email correspondence from Rutner re same	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/13/2023	Guy Wallace	0.7	\$1,350	\$945	review and analysis of Defendants' reply brief re motion to strike, ECF 674	Other Motions
11/13/2023	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re standard for second class certification motion	Class Certification
11/13/2023	Jennifer Bybee	2.7	\$925	\$2,498	Review cases cited in Opp to Motion for Leave re reconsideration standard and take notes on same	Other Motions
11/13/2023	Rachel Steyer	0.4	\$750	\$300	reviewing documents corresponding to D's access expert to determine facilities inspected	Experts (Including Retention)
11/13/2023	Rachel Steyer	0.3	\$750	\$225	response to GBW outlining facilities defendants access expert inspected	Experts (Including Retention)
11/13/2023	Rachel Steyer	0.2	\$750	\$150	call with GBW to review defendants' expert production and inspected sites	Experts (Including Retention)
11/13/2023	Rachel Steyer	0.3	\$750	\$225	reviewing and editing MTJ admin motion to extend briefing schedule and accompanying declaration and order	Other Motions
11/13/2023	Rachel Steyer	0.3	\$750	\$225	reviewing defendants' answer concerning access barriers	Other Motions
11/13/2023	Rachel Steyer	0.2	\$750	\$150	reviewing defendants' reply re motion for sanctions	Other Motions
11/13/2023	Travis Close	0.3	\$850	\$255	review and analyze meet & confer correspondence re: request to stipulate to extension of pages for reply motion	Case Organization, Planning and Strategy
11/13/2023	Travis Close	0.6	\$850	\$510	Review and analyze transcript of court's hearing on August 31, 2023, regarding court's intents on filing renewed motion for class cert.	Case Organization, Planning and Strategy
11/13/2023	Travis Close	1.3	\$850	\$1,105	Begin drafting outline for response to Def's opposition to motion for leave	Case Organization, Planning and Strategy
11/13/2023	Travis Close	1.4	\$850	\$1,190	Review and analyze files produced by third parties (public) for internal emails by Brookdale employees	Discovery (Non-Deposition)
11/13/2023	Travis Close	0.8	\$850	\$680	Review, analyze, and propose revisions to draft motion for extension of time to file reply	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/13/2023	Travis Close	1.4	\$850	\$1,190	Review and analyze defendants' opposition to motion for leave & associated declarations and exhibits	Pleadings and Motions Re: Pleadings
11/14/2023	Guy Wallace	0.8	\$1,350	\$1,080	preparation of argument re reply brief for motion for subclasses	Class Certification
11/14/2023	Guy Wallace	3.2	\$1,350	\$4,320	preparation of outline of reply brief re motion for subclasses	Class Certification
11/14/2023	Guy Wallace	3.9	\$1,350	\$5,265	preparation and drafting of outline of reply re motion re subclasses; com's with GG; MTJ; JAU re same	Class Certification
11/14/2023	Guy Wallace	2.8	\$1,350	\$3,780	review and analysis of Defendants' reply briefs re motion to strike and motion for sanctions; arguments re application of reconsideration; volume of new evidence; prior orders re case schedule; internally contradictory claims that Plaintiffs have not narrowed their proposed consumer fraud class or limited their legal theory re injury and damages	Other Motions
11/14/2023	Jennifer Bybee	2.1	\$925	\$1,943	Review cases cited in Opp to Motion for Leave re reconsideration	Other Motions
11/14/2023	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re reconsideration standard	Other Motions
11/14/2023	Jennifer Bybee	0.1	\$925	\$93	Com's re reconsideration cases	Other Motions
11/14/2023	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re reconsideration	Other Motions
11/14/2023	Travis Close	0.6	\$850	\$510	Review and analyze recent facility evaluation and complaint investigation reports issued for Garden Grove, Sunwest, San Marcos, Tracy, Lodi, and Chanate facilities	Case Organization, Planning and Strategy
11/14/2023	Travis Close	0.3	\$850	\$255	Review and analyze defendants' reply iso motion for sanctions	Other Motions
11/14/2023	Travis Close	1.5	\$850	\$1,275	Legal research checking defendants' cited cases for arguments about zealous advocacy in Reply iso motion for sanctions	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/14/2023	Travis Close	0.7	\$850	\$595	Review and analyze defendants' reply iso motion to strike & compare to arguments in pltf's opposition to same	Other Motions
11/14/2023	Travis Close	0.5	\$850	\$425	Check authority of defendants' cited cases in reply iso mtn to strike for proposition that narrowed class does not support renewed motion for class cert	Other Motions
11/14/2023	Travis Close	1.3	\$850	\$1,105	Review and analyze proposed conjoint survey by Dr. Bedi; compare to allegations of no design in Def's opposition to motion for leave	Pleadings and Motions Re: Pleadings
11/14/2023	Travis Close	1.3	\$850	\$1,105	Legal research about whether a proposed second motion for class certification violates scheduling orders	Pleadings and Motions Re: Pleadings
11/15/2023	Guy Wallace	0.7	\$1,350	\$945	review and analysis of Declarations of Jacobsen; Saad re opposition to motion for subclasses	Class Certification
11/15/2023	Guy Wallace	3.4	\$1,350	\$4,590	preparation of detailed outline of reply brief re motion for subclasses	Class Certification
11/15/2023	Guy Wallace	4.4	\$1,350	\$5,940	preparation of detailed outline re reply re motion for leave; responsive arguments re merits of subclasses	Class Certification
11/15/2023	Guy Wallace	0.8	\$1,350	\$1,080	com's with BU; MTJ; JAU re detailed outline of reply brief re motion for subclasses; further points and revisions re same	Class Certification
11/15/2023	Guy Wallace	2.1	\$1,350	\$2,835	revise and edit draft outline re reply papers on motion for subclasses; review and analysis of declaration of Jacobsen and draft declaration of Dr. Jones; com's with MTJ; BU re points re same	Class Certification
11/15/2023	Guy Wallace	3.4	\$1,350	\$4,590	revise and edit detailed outline re reply brief on motion for subclasses	Class Certification
11/15/2023	Jennifer Bybee	1.1	\$925	\$1,018	Review cases cited in Opp to Mtn. for Leave; take notes on same	Other Motions
11/15/2023	Jennifer Bybee	0.5	\$925	\$463	Look up cases we cite in Opp. to Motion to Strike	Other Motions
11/15/2023	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re tactical decision / Gustafson	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/15/2023	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re lack of delay / recent proceedings	Other Motions
11/15/2023	Mark Johnson	0.4	\$1,150	\$460	email exchanges w/ RLS re results of research on sites inspected by D's experts for reply brief iso leave to seek subclass certification; review potential locations for information re same.	Class Certification
11/15/2023	Mark Johnson	4.0	\$1,150	\$4,600	work on draft section of reply brief iso mtn for leave to seek certification of subclasses responsive to argument that allowing mtn to certify access subclasses would result in burdensome discovery and delay of case; research prior pleadings, discovery and docs for same.	Class Certification
11/15/2023	Mark Johnson	2.5	\$1,150	\$2,875	work on portions of draft reply attorney declaration iso mtn for leave to seek certification of subclasses.	Class Certification
11/15/2023	Mark Johnson	0.2	\$1,150	\$230	call w/ B Umpierre re coordination of work on preparation of reply attorney declaration iso mtn for leave to seek certification of subclasses.	Class Certification
11/15/2023	Mark Johnson	0.8	\$1,150	\$920	research and provide responses to G Wallace questions re procedural history, expert disclosures and other issues for reply memo iso mtn for leave to seek certification of subclasses.	Class Certification
11/15/2023	Mark Johnson	0.3	\$1,150	\$345	research re claim form used for damages claims in other access class action case and court approval of same for reference in reply memo iso mtn for leave to seek certification of subclasses..	Class Certification
11/15/2023	Mark Johnson	0.9	\$1,150	\$1,035	conferences w/ G Walllace and emails concerning outline and arguments for reply iso mtn for leave to seek certification of subclasses.	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/15/2023	Mark Johnson	0.2	\$1,150	\$230	email exchange w/ R Bonner re history of production of expert files and data for possible reference in reply memo and declaration iso mtn for leave to seek certification of subclasses.	Class Certification
11/15/2023	Mark Johnson	1.5	\$1,150	\$1,725	re-work draft email to OC responding to email proposing deferral of inspections; review prior correspondence, notice and notes re inspections for same; coms w/ COC re draft email.	Discovery (Non-Deposition)
11/15/2023	Rachel Steyer	0.2	\$750	\$150	email to MTJ summarizing findings of review of defendants access expert privilege log	Discovery (Non-Deposition)
11/15/2023	Rachel Steyer	1.3	\$750	\$975	reviewing and searching privilege logs for additional info concerning facilities inspected	Experts (Including Retention)
11/15/2023	Rachel Steyer	0.5	\$750	\$375	reviewing draft outline of reply motion circulated by GBW	Other Motions
11/15/2023	Travis Close	1.6	\$850	\$1,360	Legal research on whether subsequent scheduling order stipulated by parties overrides prior non-rule 16 scheduling order	Case Organization, Planning and Strategy
11/15/2023	Travis Close	1.4	\$850	\$1,190	Analysis of Def's discovery responses in RFPs and ROGs regarding evidence of equivalent facilitation	Case Organization, Planning and Strategy
11/15/2023	Travis Close	1.1	\$850	\$935	Legal research on claims forms used to solve issue of varying damages between class members	Case Organization, Planning and Strategy
11/15/2023	Travis Close	0.2	\$850	\$170	Email to MTJ re: dates of divestment for Fountaingrove and Hemet facilities	Case Organization, Planning and Strategy
11/15/2023	Travis Close	0.4	\$850	\$340	Email to MTJ, GBW re: evidence of equivalent facilitation from discovery responses & depo testimony	Discovery (Non-Deposition)
11/15/2023	Travis Close	0.8	\$850	\$680	Analyze testimony from 30(b)(6) depo of Kevin Bowman for Def's evidence/admissions re: equivalent facilitation	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/15/2023	Travis Close	0.8	\$850	\$680	Review and analyze draft outline for reply iso motion for leave	Other Motions
11/15/2023	Travis Close	1.4	\$850	\$1,190	Analyze history of scheduling orders to rebut defendants' claims that same was violated	Other Motions
11/16/2023	Guy Wallace	0.6	\$1,350	\$810	com's with BBK; BU; MTJ; JAU re preparation of reply brief re motion for subclasses	Class Certification
11/16/2023	Guy Wallace	0.7	\$1,350	\$945	team zoom with GG; JY; BBK; BU; MTJ; JAU; TCC; RLS re preparation of reply papers re motion for subclasses	Class Certification
11/16/2023	Guy Wallace	0.9	\$1,350	\$1,215	revise and edit outline of reply brief re motion for subclasses	Class Certification
11/16/2023	Guy Wallace	0.9	\$1,350	\$1,215	com's with MTJ; TCC; RLS re preparation of sections and points re numerosity and Hemet; access fixes or accommodations charged to residents	Class Certification
11/16/2023	Guy Wallace	4.5	\$1,350	\$6,075	preparation and drafting of argument re access classes; review and analysis of Defendants' arguments re same	Class Certification
11/16/2023	Guy Wallace	0.4	\$1,350	\$540	com's with Waters re Defendants' arguments re alterations history and equivalent access	Class Certification
11/16/2023	Jennifer Bybee	0.6	\$925	\$555	Conference call with cocounsel re Reply brief	Other Motions
11/16/2023	Jennifer Bybee	0.9	\$925	\$833	Review Opp to Mtn for Leave	Other Motions
11/16/2023	Jennifer Bybee	0.3	\$925	\$278	Com's with GBW re conjoint survey discussion in Opposition to MFL	Other Motions
11/16/2023	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re drafting reply and review of revised outline	Other Motions
11/16/2023	Jennifer Bybee	1.6	\$925	\$1,480	Draft section II(a) of Reply Brief	Other Motions
11/16/2023	Mark Johnson	6.0	\$1,150	\$6,900	continue working on attorney declaration iso mtn for leave to seek certification of subclasses; research files, past pleadings and discovery history for same.	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/16/2023	Mark Johnson	0.4	\$1,150	\$460	review and draft potential response to further email from OC Rutner re new inspections; com w/ COC re same.	Discovery (Non-Deposition)
11/16/2023	Rachel Steyer	0.6	\$750	\$450	team meeting with RBGG co-counsel, GBW, TCC, MTJ, JUB to discuss and prepare reply brief	Other Motions
11/16/2023	Rachel Steyer	0.6	\$750	\$450	reviewing revised/updated outline for reply brief as circulated by GBW	Other Motions
11/16/2023	Travis Close	0.3	\$850	\$255	Review and analyze revised draft outline re: reply iso motion for leave	Case Organization, Planning and Strategy
11/16/2023	Travis Close	1.7	\$850	\$1,445	Legal research re: affirmative duty to comply with ADAAG	Case Organization, Planning and Strategy
11/16/2023	Travis Close	1.5	\$850	\$1,275	Legal research on whether it's legal to require residents to pay for access improvements	Case Organization, Planning and Strategy
11/16/2023	Travis Close	0.4	\$850	\$340	Call with GBW re: cases holding that private establishments cannot surcharge for ADA access	Case Organization, Planning and Strategy
11/16/2023	Travis Close	1.4	\$850	\$1,190	Draft section on Brookdale's policy requiring payment for alterations is illegal surcharge	Case Organization, Planning and Strategy
11/16/2023	Travis Close	0.9	\$850	\$765	review and analyze history or correspondence with experts re: production of underlying files	Experts (Including Retention)
11/16/2023	Travis Close	0.7	\$850	\$595	Team meeting with GBW, MTJ, RLS, JUB, & co-counsel re: filings for reply iso motion for leave to file second class cert	Pleadings and Motions Re: Pleadings
11/17/2023	Guy Wallace	3.1	\$1,350	\$4,185	preparation and drafting of reply argument re access subclasses	Class Certification
11/17/2023	Guy Wallace	4.7	\$1,350	\$6,345	preparation and drafting of section re access subclasses	Class Certification
11/17/2023	Guy Wallace	2.1	\$1,350	\$2,835	preparation and drafting of class cert reply brief; com's with JY; BBK; BU; MTJ; TCC; RLS re same	Class Certification
11/17/2023	Jennifer Bybee	1.1	\$925	\$1,018	Draft Section II(a) of Reply brief	Other Motions
11/17/2023	Jennifer Bybee	4.2	\$925	\$3,885	Draft section II(b)(of Reply Brief	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/17/2023	Rachel Steyer	1.9	\$750	\$1,425	drafting assigned section for reply brief	Other Motions
11/17/2023	Rachel Steyer	0.4	\$750	\$300	reviewing draft section of brief circulated by GBW	Other Motions
11/17/2023	Rachel Steyer	0.3	\$750	\$225	reviewing defendants brief opposition motion to extend briefing schedule	Other Motions
11/17/2023	Rachel Steyer	0.2	\$750	\$150	reviewing draft section of brief circulated by BU	Other Motions
11/17/2023	Travis Close	0.7	\$850	\$595	Review and analyze exhibits filed in Decl. of GBW for evidence of surcharge for access improvements	Case Organization, Planning and Strategy
11/17/2023	Travis Close	0.6	\$850	\$510	Analysis of Bowman 30(b)(6) testimony for evidence of surcharges on residents for access improvements	Case Organization, Planning and Strategy
11/17/2023	Travis Close	1.5	\$850	\$1,275	Continue drafting section on illegal surcharges per residency agreement policy	Case Organization, Planning and Strategy
11/17/2023	Travis Close	2.4	\$850	\$2,040	Draft section of reply brief iso motion to amend re: Dr. Bedi's conjoint analysis	Case Organization, Planning and Strategy
11/17/2023	Travis Close	0.8	\$850	\$680	Analysis of evidence of access surcharges from 30(b)(6) depo testimony exhibits	Discovery (Non-Deposition)
11/17/2023	Travis Close	0.6	\$850	\$510	Review, analyze, and propose revisions for draft section re: disability access subclass	Pleadings and Motions Re: Pleadings
11/17/2023	Travis Close	1.2	\$850	\$1,020	Analyze plaintiffs' allegations/testimony re: how payment of community fee would be impacted by disclosure of staffing system	Pleadings and Motions Re: Pleadings
11/18/2023	Guy Wallace	2.9	\$1,350	\$3,915	preparation and drafting of reply brief re motion for subclasses	Class Certification
11/18/2023	Guy Wallace	3.8	\$1,350	\$5,130	preparation of integrated draft of reply brief re motion for subclasses; review and analysis of sections re drafts; com's with JAU re same (.4)	Class Certification
11/18/2023	Guy Wallace	1.8	\$1,350	\$2,430	preparation and drafting of motion re subclasses; revise and edit sections and headings	Class Certification
11/18/2023	Jennifer Bybee	0.5	\$925	\$463	Finalize section II(a) and circulate to GBW, RLS, MTJ and TCC	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/18/2023	Jennifer Bybee	1.0	\$925	\$925	Finalize section II(b) of reply brief and circulate to GBW, MTJ, TCC, and RLS	Other Motions
11/18/2023	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re reply drafts	Other Motions
11/18/2023	Mark Johnson	11.3	\$1,150	\$12,995	continue drafting attorney dec iso mtn for leave, research record for information and cites for same; revise and complete draft for G Wallace review and cover re same.	Class Certification
11/19/2023	Guy Wallace	1.3	\$1,350	\$1,755	revise and edit introduction to reply brief re motion for subclasses	Class Certification
11/19/2023	Guy Wallace	2.1	\$1,350	\$2,835	revise and edit draft reply brief re motion for subclasses	Class Certification
11/19/2023	Guy Wallace	4.8	\$1,350	\$6,480	revise and edit all sections of draft reply brief re motion for subclasses	Class Certification
11/19/2023	Guy Wallace	1.7	\$1,350	\$2,295	revise and edit further draft of reply brief re motion for subclasses; incorporate further proposed edits from co-counsel and com's with MTJ re same	Class Certification
11/20/2023	Guy Wallace	1.7	\$1,350	\$2,295	revise and edit further draft of reply brief re motion for subclasses	Class Certification
11/20/2023	Guy Wallace	1.5	\$1,350	\$2,025	review and analysis of draft Umpierre declarations re motion for subclasses; revise and edit same; com's with MTJ; BU re same	Class Certification
11/20/2023	Guy Wallace	5.6	\$1,350	\$7,560	review and analysis of further draft of reply brief re motion for subclasses; reply declaration of Umpierre; reply declaration of Grunfeld; reply declaration of Wallace; revise and edit same	Class Certification
11/20/2023	Guy Wallace	2.6	\$1,350	\$3,510	revise and edit final version of reply brief re motion for subclasses; declaration of Umpierre; com's with GG; BU; MTJ; JAU; RLS re same	Class Certification
11/20/2023	Jennifer Bybee	1.8	\$925	\$1,665	Review draft reply brief and create redline re proposed cuts to same	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/20/2023	Jennifer Bybee	0.1	\$925	\$93	Call N. Riley, court clerk, re status of administrative motion for more time	Other Motions
11/20/2023	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re contacting clerk	Other Motions
11/20/2023	Jennifer Bybee	1.5	\$925	\$1,388	Final redline edit of reply brief	Other Motions
11/20/2023	Jennifer Bybee	0.7	\$925	\$648	Review J. Mastin redlines of facility reports and email summary of barrier description edits to MTJ	Other Motions
11/20/2023	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re filing	Other Motions
11/20/2023	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re filing	Other Motions
11/20/2023	Jennifer Bybee	1.0	\$925	\$925	Cite check reply brief	Other Motions
11/20/2023	Mark Johnson	1.0	\$1,150	\$1,150	research and analysis re assessment data and residency agreements for numerosity issue at Hemet; draft email memo re same.	Class Certification
11/20/2023	Mark Johnson	0.2	\$1,150	\$230	conference w/ B Umpierre, G Grunfeld re Umpierre declaration	Class Certification
11/20/2023	Mark Johnson	0.3	\$1,150	\$345	calls (x3) w/ GBW re status and issues related to brief and Umpierre declaration iso reply for mtn for leave to seek certification of subclasses.	Class Certification
11/20/2023	Mark Johnson	0.7	\$1,150	\$805	draft G Wallace declaration iso reply iso mtn for leave to file mtn to certify subclasses; review opinion in prior case approving claim forms; identify and review exhibits for declaration	Class Certification
11/20/2023	Mark Johnson	0.2	\$1,150	\$230	call w/ B Umpierre re reply declaration iso mtn for leave to fille mtn for certification of subclasses.	Class Certification
11/20/2023	Mark Johnson	5.8	\$1,150	\$6,670	work on additions and revisions to multiple revised versions of Umpierre declaration iso mtn for leave to file mtn for certification of subclasses; coms w/ B umpierre re same and resarch facts, depo testimony, pleadings for same.	Class Certification
11/20/2023	Mark Johnson	0.2	\$1,150	\$230	email coms w/ J Bybee re revisions to Mastin dec iso mtn for leave to file mtn for certification of subclasses.	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/20/2023	Mark Johnson	0.4	\$1,150	\$460	email exchanges w/ OC E Rutner and others re promised document production, draft section of discovery ltr brief re docs responsive to set 9 and 10 of RPFs.	Discovery (Non-Deposition)
11/20/2023	Rachel Steyer	0.7	\$750	\$525	reviewing draft BSU declaration circulated by MTJ	Other Motions
11/20/2023	Rachel Steyer	1.1	\$750	\$825	conducting review and proofread of revised BSU declaration	Other Motions
11/20/2023	Rachel Steyer	0.3	\$750	\$225	reviewing portions of defendants' opposition to class cert. brief to check legal cites	Other Motions
11/20/2023	Rachel Steyer	0.2	\$750	\$150	response to GBW concerning review of cite check in defendants opposition to class cert. brief	Other Motions
11/20/2023	Rachel Steyer	0.9	\$750	\$675	reviewing and proofreading draft of reply brief	Other Motions
11/20/2023	Rachel Steyer	0.2	\$750	\$150	reviewing admin motion to seal portion of Jones declaration	Other Motions
11/20/2023	Travis Close	0.8	\$850	\$680	Review and analyze communications (incl. archived) for evidence of Def's experts inspections at named plaintiff facilities	Case Organization, Planning and Strategy
11/20/2023	Travis Close	0.2	\$850	\$170	Email to MTJ re: defendants' access inspections at named plaintiff facilities	Case Organization, Planning and Strategy
11/20/2023	Travis Close	1.2	\$850	\$1,020	Analysis of barriers measured & listed in Def's draft expert report for Fountaingrove facility	Discovery (Non-Deposition)
11/20/2023	Travis Close	0.9	\$850	\$765	Review and analyze revised draft of reply brief iso motion to amend	Pleadings and Motions Re: Pleadings
11/20/2023	Travis Close	1.4	\$850	\$1,190	Cite & fact checking rely brief -- sections I-III	Pleadings and Motions Re: Pleadings
11/20/2023	Travis Close	1.8	\$850	\$1,530	Cite & fact checking rely brief -- sections IV-VII	Pleadings and Motions Re: Pleadings
11/20/2023	Travis Close	0.8	\$850	\$680	Review and analyze draft decl. of Brian Umpierre for consistency with my records of discovery & correspondence	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/20/2023	Travis Close	0.2	\$850	\$170	Review and analyze Decl. of Jones iso reply motion for leave	Pleadings and Motions Re: Pleadings
11/21/2023	Guy Wallace	3.2	\$1,350	\$4,320	review and analysis of reply papers re motion to certify subclasses; identification of further potential factual and legal issues re same & research re same	Class Certification
11/21/2023	Mark Johnson	0.2	\$1,150	\$230	coms w/ OC Bertino and w/ R Bonner re document production	Discovery (Non-Deposition)
11/21/2023	Mark Johnson	0.3	\$1,150	\$345	coms w/ R Steyer re review and summary of new production; revies description of same	Discovery (Non-Deposition)
11/21/2023	Rachel Steyer	2.7	\$750	\$2,025	reviewing latest Brookdale production and preparing memo summarizing production	Discovery (Non-Deposition)
11/21/2023	Rachel Steyer	0.2	\$750	\$150	reviewing financial disclosures circulated by TCC	Discovery (Non-Deposition)
11/21/2023	Travis Close	0.4	\$850	\$340	Email to MTJ, RLS re: analysis of Brookdale's rent increases on finances	Case Organization, Planning and Strategy
11/21/2023	Travis Close	0.8	\$850	\$680	Review and analyze previous years' financial statements publicly released for info on resident fee increases	Case Organization, Planning and Strategy
11/21/2023	Travis Close	1.6	\$850	\$1,360	Analysis of resident fee increases' impact on Brookdale's financials between 2022-2023	Case Organization, Planning and Strategy
11/21/2023	Travis Close	1.1	\$850	\$935	Review and analyze filed version of reply iso motion for leave, & declarations of Jones, Umpierre, Wallace, Grunfeld, for inadvertent errors	Case Organization, Planning and Strategy
11/21/2023	Travis Close	0.6	\$850	\$510	Review and analyze recent facility evaluation and complaint investigation reports issued for Chatsworth, Monrovia, Ocean House, Tracy, and Redwood City facilities	Discovery (Non-Deposition)
11/21/2023	Travis Close	0.7	\$850	\$595	Analyze updated job descriptions ESI for language changes in care positions vs. old descriptions	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/21/2023	Travis Close	0.7	\$850	\$595	Analyze updated resident assessments released for plaintiffs to determine changes in physical capabilities & costs for services	Discovery (Non-Deposition)
11/22/2023	Guy Wallace	2.2	\$1,350	\$2,970	review and analysis of order granting extension re reply brief; preparation of additional points and tasks for amended reply brief and Umpierre declaration	Class Certification
11/22/2023	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ re inspections of named plaintiff facilities; Defendants' portion of letter brief re SA formula; analysis of Defendants' declaration re same	Other Motions
11/22/2023	Mark Johnson	0.2	\$1,150	\$230	revise draft response to OC Rutner re inspections, confer w/ GBW re same	Discovery (Non-Deposition)
11/22/2023	Mark Johnson	0.7	\$1,150	\$805	review D section of draft ltr brief an declaration iso same re benchmark formula	Discovery (Non-Deposition)
11/22/2023	Mark Johnson	0.1	\$1,150	\$115	review email from oc Bertino re production; email to R Bonner re same.	Discovery (Non-Deposition)
11/22/2023	Travis Close	1.3	\$850	\$1,105	Analyze master lease transactions/restructures in California for 2023 based on financial disclosures	Case Organization, Planning and Strategy
11/22/2023	Travis Close	0.7	\$850	\$595	analyze RevPAR and RevPOR trends based on recent financial disclosures	Case Organization, Planning and Strategy
11/24/2023	Guy Wallace	2.2	\$1,350	\$2,970	legal research and analysis re Nguyen; Pulaski; recent district court cases and damages analysis re calculation of restitution under the CLRA and the UCL is at the time of the transaction, not thereafter; preparation of further point re same for amended reply brief re subclasses	Class Certification
11/27/2023	Guy Wallace	1.2	\$1,350	\$1,620	review and analysis of potential additional points for amended reply brief re motion for subclasses; com's with JAU re same	Class Certification
11/27/2023	Guy Wallace	0.8	\$1,350	\$1,080	analysis of remaining discovery for pretrial preparation	Discovery (Non-Deposition)
11/27/2023	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re reply brief	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/27/2023	Mark Johnson	0.3	\$1,150	\$345	respond to Wallace and Steyer emails re recent data productions with descriptions of same and assessment of size of 2nd production; review prior remails and download zip files for same.	Discovery (Non-Deposition)
11/27/2023	Rachel Steyer	0.5	\$750	\$375	reviewing policy manual for community fee discussion	Discovery (Non-Deposition)
11/27/2023	Rachel Steyer	0.2	\$750	\$150	reviewing production attempting to determine total page count	Discovery (Non-Deposition)
11/27/2023	Travis Close	1.9	\$850	\$1,615	Legal research on criteria for readily achievable barrier removal for publicly traded companies	Case Organization, Planning and Strategy
11/27/2023	Travis Close	0.2	\$850	\$170	Email to MTJ re: readily achievable barrier removal analysis	Case Organization, Planning and Strategy
11/28/2023	Jennifer Bybee	1.2	\$925	\$1,110	Edit Reply brief in redline to suggest removal of duplicative info	Class Certification
11/28/2023	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re cutting duplications	Class Certification
11/28/2023	Jennifer Bybee	1.3	\$925	\$1,203	Edit and revise Reply brief	Class Certification
11/28/2023	Mark Johnson	0.2	\$1,150	\$230	coms W R Bonner and R Steyer re status and review of latest production of docs responsive to sets 9 and 10 of doc requests.	Discovery (Non-Deposition)
11/28/2023	Mark Johnson	1.0	\$1,150	\$1,150	email exchange and call w/ J Thornton re strategy on mtn to compel benchmark formula and rebutting / undermining Ds supporting declaration from IT; potential flaws or misstatements in declaration; possible rebuttal expert declaration for mtn.	Other Motions
11/28/2023	Mark Johnson	2.5	\$1,150	\$2,875	review and analyze D section of mtn to compel benchmark formula and supporting dec from IT employee; work on revision to P section of joint ltr brief to respond to same.	Other Motions
11/28/2023	Rachel Steyer	0.2	\$750	\$150	response to GBW summarizing extent of construction related documents in production	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/28/2023	Rachel Steyer	6.5	\$750	\$4,875	reviewing latest document production and preparing memo summarizing production	Discovery (Non-Deposition)
11/28/2023	Travis Close	0.9	\$850	\$765	Legal research on DSS regulations & criteria for determining whether a facility is experiencing understaffing	Case Organization, Planning and Strategy
11/28/2023	Travis Close	0.3	\$850	\$255	Review and analyze recent and pending facility evaluation and complaint investigation reports issued for Windsor, Chanate, and Paulin Creek facilities	Discovery (Non-Deposition)
11/28/2023	Travis Close	2.4	\$850	\$2,040	Analysis of Brookdale's public statements regarding its service alignment platform and how staffing is provided or connected to assessments	Other Motions
11/29/2023	Guy Wallace	0.4	\$1,350	\$540	revise and edit amended reply brief re subclasses; com's with JAU re same	Class Certification
11/29/2023	Guy Wallace	1.2	\$1,350	\$1,620	review and analysis of Jacobsen Declaration; Umpierre Declaration; com's with BU re potential areas of amendment to Umpierre Reply Declaration	Class Certification
11/29/2023	Jennifer Bybee	1.3	\$925	\$1,203	Incorporate suggested edits into Amended Reply draft from GBW list; email same to GBW	Class Certification
11/29/2023	Jennifer Bybee	1.4	\$925	\$1,295	Cite check amended reply brief	Class Certification
11/29/2023	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re amended reply	Class Certification
11/29/2023	Rachel Steyer	0.4	\$750	\$300	downloading and transmitting relevant construction documents to GBW for review	Discovery (Non-Deposition)
11/30/2023	Guy Wallace	0.9	\$1,350	\$1,215	preparation of amended reply brief re subclasses; com's with JAU re same	Class Certification
11/30/2023	Jennifer Bybee	2.4	\$925	\$2,220	Check legal citations for accuracy in Amended Reply brief	Class Certification
11/30/2023	Mark Johnson	0.1	\$1,150	\$115	review and draft response to J Yelin re inspections of facilities, alternative proposals.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/30/2023	Mark Johnson	0.4	\$1,150	\$460	com w/ R Steyer and review and analysis of memo re overview of latest document production from Brookdale	Discovery (Non-Deposition)
11/30/2023	Mark Johnson	1.3	\$1,150	\$1,495	review and analyze draft of Schroyer declaration iso mtn to compel benchmark formula; coms w/ B Umpierre and J Thornton re same; review and compare revised draft and com w/ J Thornton re finalizing	Other Motions
11/30/2023	Rachel Steyer	0.3	\$750	\$225	received call from Brookdale caller in Oregon seeking referral for attorney	Class Outreach and Contact
11/30/2023	Rachel Steyer	2.3	\$750	\$1,725	completing final review of production and updating memo	Discovery (Non-Deposition)
11/30/2023	Travis Close	1.8	\$850	\$1,530	Review and analyze latest batch of docs released (BKD3017816 thru BKD3027647) for info on accessibility improvements made at named plaintiff facilities	Case Organization, Planning and Strategy
11/30/2023	Travis Close	0.2	\$850	\$170	Email to GBW re: organizing document review accessibility assignment	Discovery (Non-Deposition)
11/30/2023	Travis Close	1.4	\$850	\$1,190	Review, analyze, and record invoices released for accessibility-related purchases at named plaintiff facilities	Discovery (Non-Deposition)
12/1/2023	Guy Wallace	3.9	\$1,350	\$5,265	revise and edit amended reply brief re motion for subclasses	Class Certification
12/1/2023	Guy Wallace	1.1	\$1,350	\$1,485	legal research and analysis re cases cited in draft amended reply brief re motion for subclasses	Class Certification
12/1/2023	Guy Wallace	0.4	\$1,350	\$540	com's with BU; MTJ; JAU re preparation of amended reply brief and declaration of BU	Class Certification
12/1/2023	Guy Wallace	0.9	\$1,350	\$1,215	com's with BU; JAU re further revisions to amended reply brief and amended declaration of BU	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/1/2023	Guy Wallace	0.6	\$1,350	\$810	review and analysis of comparison version of current amended draft of reply brief re subclasses motion and 11/20/23 version	Class Certification
12/1/2023	Guy Wallace	1.4	\$1,350	\$1,890	prepare for and participate in zoom with GG; JY; BBK; AX: BU; MTJ; JAU; TCC; RLS re discovery; trial preparation	Discovery (Non-Deposition)
12/1/2023	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ; TCC re potential further depositions	Discovery (Non-Deposition)
12/1/2023	Guy Wallace	0.3	\$1,350	\$405	com's with BBK; RLS re potential motion to compel class list re transportation class	Discovery (Non-Deposition)
12/1/2023	Jennifer Bybee	1.3	\$925	\$1,203	Zoom call with co-counsel re discovery, next steps, etc.	Case Organization, Planning and Strategy
12/1/2023	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re Amended Reply brief	Class Certification
12/1/2023	Jennifer Bybee	0.7	\$925	\$648	Cite check legal citations in amended reply brief	Class Certification
12/1/2023	Jennifer Bybee	0.1	\$925	\$93	Create comparison document of original reply brief and amended reply brief	Class Certification
12/1/2023	Jennifer Bybee	0.1	\$925	\$93	Email comparison of reply briefs to GBW and co-counsel at RBGG	Class Certification
12/1/2023	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re amended reply brief	Class Certification
12/1/2023	Mark Johnson	1.2	\$1,150	\$1,380	team zoom mtg w/ Wallace, Grunfeld, Yelin, Siegal, Xu, Edmundson, Umpierre, Steyer, Close, Bybee re potential depositions, doc production Rule 26 disclosure update, expert discovery cut-off, staffing analysis, proof chart, witnesses, Kennedy damages, etc.	Trial and Pretrial Preparation
12/1/2023	Rachel Steyer	1.2	\$750	\$900	meeting with RBGG co-counsel, BSU, MTJ, GBW, TCC to review and discuss outstanding tasks and assignments	Case Organization, Planning and Strategy
12/1/2023	Travis Close	0.4	\$850	\$340	Prep for bi-weekly meeting with co-counsel (review last meeting's notes and analyze any unfinished tasks)	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/1/2023	Travis Close	1.2	\$850	\$1,020	Team meeting with MTJ, GBW, RLS, & co-counsel re: discovery disputes, trial preparation, and MSJ	Case Organization, Planning and Strategy
12/1/2023	Travis Close	0.7	\$850	\$595	Analysis of prior meet and confer notes to determine outstanding issues of discovery for resolve	Discovery (Non-Deposition)
12/2/2023	Guy Wallace	1.6	\$1,350	\$2,160	revise and edit draft amended Umpierre Reply Declaration	Class Certification
12/2/2023	Guy Wallace	1.1	\$1,350	\$1,485	analysis of remaining discovery needs; com's with MTJ re same	Discovery (Non-Deposition)
12/2/2023	Jennifer Bybee	0.5	\$925	\$463	Legal cite check of Amended Reply Brief	Class Certification
12/2/2023	Jennifer Bybee	1.8	\$925	\$1,665	Check record cites for accuracy in Amended Reply brief	Class Certification
12/2/2023	Jennifer Bybee	0.1	\$925	\$93	Email updated Amended Reply brief to GBW	Class Certification
12/2/2023	Mark Johnson	0.4	\$1,150	\$460	call w/ G Wallace re discovery for trial, contention interrogatories	Discovery (Non-Deposition)
12/3/2023	Guy Wallace	1.4	\$1,350	\$1,890	revise and edit final draft of amended reply brief re subclasses	Class Certification
12/3/2023	Guy Wallace	0.7	\$1,350	\$945	revise and edit draft amended reply declaration of Umpierre	Class Certification
12/3/2023	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re further discovery; supplementation re existing discovery requests; Rule 26 disclosures	Discovery (Non-Deposition)
12/3/2023	Guy Wallace	2.1	\$1,350	\$2,835	analysis of further areas of discovery needed for trial preparation	Discovery (Non-Deposition)
12/3/2023	Guy Wallace	1.2	\$1,350	\$1,620	review and analysis of elements of Plaintiffs' claims under the ADA; CLRA; UCL	Trial and Pretrial Preparation
12/3/2023	Mark Johnson	0.6	\$1,150	\$690	call w/ GBW re discovery strategy for trial, contention rogs, D's position re limit on rogs	Discovery (Non-Deposition)
12/3/2023	Mark Johnson	1.5	\$1,150	\$1,725	review prior rogs and RPDs, prepare history and tabulation, summary re same; locate and review contention rogs; email to COC at RBGG re same.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/4/2023	Guy Wallace	0.7	\$1,350	\$945	com's with JAU; TBS re preparation of filing of amended reply brief and Umpierre declaration re motion for subclasses	Class Certification
12/4/2023	Guy Wallace	0.9	\$1,350	\$1,215	preparation of analysis of Rule 26 expert disclosures	Discovery (Non-Deposition)
12/4/2023	Guy Wallace	0.5	\$1,350	\$675	com's with BBK; MTJ re discovery motion re class list for transportation class; time period and Gonzalez	Discovery (Non-Deposition)
12/4/2023	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of Schroyer Declaration and staffing analyses; com's with MTJ re remaining work re staffing analyses and production of data re same	Experts (Including Retention)
12/4/2023	Guy Wallace	0.5	\$1,350	\$675	review and analysis of Defendants' further motion to strike; further motion for sanctions; com's with MTJ; JAU re same	Other Motions
12/4/2023	Guy Wallace	0.5	\$1,350	\$675	revise and edit draft MTC letter brief re SA benchmark formula	Other Motions
12/4/2023	Guy Wallace	1.3	\$1,350	\$1,755	legal research and analysis re elements of Plaintiffs' consumer fraud claims; review and analysis of draft proof chart from TCC	Trial and Pretrial Preparation
12/4/2023	Jennifer Bybee	0.1	\$925	\$93	Email GBW and B. Umpierre exhibits to Umpierre Decl.	Case / Document Administration
12/4/2023	Jennifer Bybee	0.1	\$925	\$93	Review emails from co-counsel re class member email, discovery, amended reply brief	Case Organization, Planning and Strategy
12/4/2023	Jennifer Bybee	1.5	\$925	\$1,388	Edit and revise B. Umpierre Declaration	Class Certification
12/4/2023	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re Umpierre Decl.	Class Certification
12/4/2023	Jennifer Bybee	0.3	\$925	\$278	Final review of Amended Reply brief	Class Certification
12/4/2023	Jennifer Bybee	0.1	\$925	\$93	Email co-counsel final documents for filing re amended reply brief and Umpierre declaration	Class Certification
12/4/2023	Jennifer Bybee	0.2	\$925	\$185	Assemble exhibits to Umpierre Decl.	Class Certification
12/4/2023	Rachel Steyer	0.2	\$750	\$150	reviewing contention interrogatories circulated by MTJ	Discovery (Non-Deposition)
12/4/2023	Rachel Steyer	0.2	\$750	\$150	response to MTJ, GBW, TCC concerning staffing related documents in production	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/4/2023	Rachel Steyer	2.8	\$750	\$2,100	reviewing production for billing detail by revenue spreadsheets	Discovery (Non-Deposition)
12/4/2023	Rachel Steyer	0.6	\$750	\$450	proofreading and reviewing plaintiffs' draft portion of joint discovery letter brief, Schroyer decl. ISO brief, defendants' supporting declaration	Discovery (Non-Deposition)
12/4/2023	Rachel Steyer	0.6	\$750	\$450	reviewing defendants' motions to strike and sanctions	Other Motions
12/4/2023	Rachel Steyer	0.3	\$750	\$225	reviewing TCC prepared chart	Trial and Pretrial Preparation
12/4/2023	Travis Close	0.6	\$850	\$510	Review and analyze draft jury instructions research on ADA, etc.	Case Organization, Planning and Strategy
12/4/2023	Travis Close	2.4	\$850	\$2,040	Legal research re: PFC/elements for Title III of ADA claims - physical access, reasonable accommodation, emergency evacuation, & transportation	Trial and Pretrial Preparation
12/4/2023	Travis Close	0.8	\$850	\$680	Legal research re: PFC/elements for Consumers Legal Remedies Act (CA)	Trial and Pretrial Preparation
12/4/2023	Travis Close	0.7	\$850	\$595	Legal research re: PFC/elements for Unfair Competition Law	Trial and Pretrial Preparation
12/5/2023	Guy Wallace	1.4	\$1,350	\$1,890	review and analysis of draft MTC re benchmark formula; review and analysis of 4AC allegations; com's with MTJ re same	Other Motions
12/5/2023	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re motions for sanctions	Other Motions
12/5/2023	Jennifer Bybee	0.2	\$925	\$185	Review motion for sanctions	Other Motions
12/5/2023	Jennifer Bybee	0.6	\$925	\$555	Review motion to strike and Jacobsen declaration	Other Motions
12/5/2023	Mark Johnson	0.2	\$1,150	\$230	email exchanges w/ A Xu re contention and other rogs for trial of individual cases on merits; strategy for same and examples.	Discovery (Non-Deposition)
12/5/2023	Mark Johnson	0.2	\$1,150	\$230	email exchange w/ D Marks re timing of Rule 26 disclosures for experts; feasibility and scope of additional staffing analysis; com w G Wallace re same	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/5/2023	Mark Johnson	1.2	\$1,150	\$1,380	review and compare data re Plaintiffs' tenure at each Brookdale facility with date range for data produced; analyze and document same in chart; draft email to G Wallace and T. Close with summary of results and options for seeking additional assessment and LRD data for additional staffing analyses.	Trial and Pretrial Preparation
12/5/2023	Travis Close	1.2	\$850	\$1,020	Draft email to Doug Cross & June Kailes re: case updates and trial planning	Case Organization, Planning and Strategy
12/5/2023	Travis Close	0.9	\$850	\$765	Review and analyze recent facility evaluation and complaint investigation reports issued for Chanate, Kettleman Lane, Lodi, Murrieta, Mirage Inn, Roseville, Santa Monica, Danville facilities.	Case Organization, Planning and Strategy
12/5/2023	Travis Close	0.9	\$850	\$765	Legal research re: recent Ninth Circuit law analyzing private v. public accommodation usage for Title III liability	Trial and Pretrial Preparation
12/5/2023	Travis Close	0.8	\$850	\$680	Review and analyze applicable jury instructions for CLRA claims in California & Ninth Circuit	Trial and Pretrial Preparation
12/6/2023	Guy Wallace	2.1	\$1,350	\$2,835	review and analysis of Defendants' Answer; Plaintiffs' draft contention interrogatories; com's with AX; MTJ re same	Discovery (Non-Deposition)
12/6/2023	Guy Wallace	0.6	\$1,350	\$810	analysis of discovery re staffing analyses for named Plaintiffs' facilities; com's with DTM; MTJ re same	Discovery (Non-Deposition)
12/6/2023	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of list of declarant residents or representatives submitted by Defendants' in opposition to class certification; com's with MTJ; RLS re potential depositions and RFP's re resident files	Discovery (Non-Deposition)
12/6/2023	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of Defendants' motion to strike; com's with JY; JAU re same	Other Motions
12/6/2023	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re motion to strike	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/6/2023	Mark Johnson	0.3	\$1,150	\$345	review draft letter brief re class list for transportation class and com w/ COC Bien-Kahn re same	Other Motions
12/6/2023	Rachel Steyer	0.2	\$750	\$150	reviewing draft discovery letter brief re transportation class contact info circulated by BBK	Discovery (Non-Deposition)
12/6/2023	Rachel Steyer	0.3	\$750	\$225	reviewing draft interrogatories circulated by AX	Discovery (Non-Deposition)
12/6/2023	Rachel Steyer	0.2	\$750	\$150	call with GBW to discuss preparing RFP for Brookdale happy camper declarants	Discovery (Non-Deposition)
12/6/2023	Rachel Steyer	1.0	\$750	\$750	drafting RFPs set 11 focused on happy camper declarant documents; reviewing earlier RFPs for reference/guidance	Discovery (Non-Deposition)
12/6/2023	Rachel Steyer	0.2	\$750	\$150	double checking production to confirm lack of documents for happy camper declarants on spreadsheet	Discovery (Non-Deposition)
12/6/2023	Rachel Steyer	0.6	\$750	\$450	reviewing and beginning to prepare master exhibit list for class cert and motion for leave motions	Trial and Pretrial Preparation
12/6/2023	Travis Close	0.7	\$850	\$595	Legal research on burden & proportionality in party responding to contention interrogatories	Case Organization, Planning and Strategy
12/6/2023	Travis Close	0.4	\$850	\$340	Review, analyze, propose revisions for draft joint letter brief re: names and contact info for wheelchair and scooter class	Discovery (Non-Deposition)
12/6/2023	Travis Close	0.3	\$850	\$255	Review, analyze, and propose revisions for draft Bernie Jestrabek-Hart interrogatories, Set 2	Discovery (Non-Deposition)
12/6/2023	Travis Close	1.7	\$850	\$1,445	Continue drafting case proof chart -- claim 8 -- Stacia Stiner	Trial and Pretrial Preparation
12/6/2023	Travis Close	0.8	\$850	\$680	Review and analyze staffing analyses by Flores/Schroyer & dates of data for plaintiff facilities	Trial and Pretrial Preparation
12/6/2023	Travis Close	2.3	\$850	\$1,955	Analyze client records provided by Stiner to determine dates of formal complaints made & reports of misconduct at San Ramon facility	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/6/2023	Travis Close	1.4	\$850	\$1,190	Review and analyze docs produced by Defendants showing staff communications with Ms. Stiner during tenancy at San Ramon	Trial and Pretrial Preparation
12/7/2023	Guy Wallace	1.4	\$1,350	\$1,890	analysis of remaining discovery that needs to be undertaken for purposes of trial preparation and preparation of discovery plan re same	Discovery (Non-Deposition)
12/7/2023	Guy Wallace	0.5	\$1,350	\$675	review and analysis of email from Rutner requesting deposition of Schroyer re discovery issue; com's with MTJ re same and response thereto	Discovery (Non-Deposition)
12/7/2023	Guy Wallace	0.5	\$1,350	\$675	review and analysis of draft interrogatories; preparation of further interrogatory re compliance with 22 CCR section 87411	Discovery (Non-Deposition)
12/7/2023	Guy Wallace	0.4	\$1,350	\$540	analysis of potential RFA's and issues re authentication of documents; com's with MTJ and TCC re same	Discovery (Non-Deposition)
12/7/2023	Guy Wallace	0.7	\$1,350	\$945	com's with Marks; JT; MTJ re staffing analysis and further production of data re same and schedule re same	Discovery (Non-Deposition)
12/7/2023	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re further depositions and schedule re discovery	Discovery (Non-Deposition)
12/7/2023	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of Resident Bill of Rights; com's with MTJ; RLS; RAB re same	Discovery (Non-Deposition)
12/7/2023	Guy Wallace	1.2	\$1,350	\$1,620	revise and edit MTC re Service Alignment formula	Other Motions
12/7/2023	Jennifer Bybee	1.5	\$925	\$1,388	Research cases cited in Defendant's MTS	Other Motions
12/7/2023	Jennifer Bybee	1.7	\$925	\$1,573	Review prior Opp. to MTS and begin drafting Opp. to MTS	Other Motions
12/7/2023	Jennifer Bybee	0.2	\$925	\$185	Research motions to strike and LR 7-5	Other Motions
12/7/2023	Mark Johnson	1.4	\$1,150	\$1,610	legal research re authenticity of documents, Rule 36, sample RFAs; draft email to T Close and G Wallace re same.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/7/2023	Mark Johnson	0.8	\$1,150	\$920	draft proposed email to OC for Thornton/Marks review re demand for additional data for staffing analysis for trial	Discovery (Non-Deposition)
12/7/2023	Mark Johnson	0.9	\$1,150	\$1,035	review email from E Rutner re need for Schroyer depo to finalize mtc joint letter re benchmark formula and draft response to same with proposed compromise	Other Motions
12/7/2023	Mark Johnson	0.7	\$1,150	\$805	review, finalize revised joint letter re benchmark formula based on edits from G Wallace and R Steyer; draft cover letter re same and send to OC	Other Motions
12/7/2023	Mark Johnson	0.6	\$1,150	\$690	call w Thornton, Marks, Wallace re strategy and data needed for additional analysis for six facilities for trial	Trial and Pretrial Preparation
12/7/2023	Rachel Steyer	2.6	\$750	\$1,950	reviewing and drafting memo summarizing latest defendant production	Discovery (Non-Deposition)
12/7/2023	Rachel Steyer	0.3	\$750	\$225	reviewing and editing revised MTJ joint discovery letter brief re benchmark formula	Discovery (Non-Deposition)
12/7/2023	Rachel Steyer	0.5	\$750	\$375	searching production for resident rights documents	Discovery (Non-Deposition)
12/7/2023	Rachel Steyer	0.2	\$750	\$150	call with GBW to review and discuss resident rights policies and documents in production	Discovery (Non-Deposition)
12/7/2023	Rachel Steyer	0.5	\$750	\$375	reviewing near final drafts of AX interrogatories	Discovery (Non-Deposition)
12/7/2023	Rachel Steyer	0.2	\$750	\$150	follow up to RBGG, BSU, GBW, MTJ, TCC, JUB concerning discussion of resident rights and Brookdale policies	Discovery (Non-Deposition)
12/7/2023	Rachel Steyer	0.7	\$750	\$525	preparing and finalizing RFPs, set 11	Discovery (Non-Deposition)
12/7/2023	Rachel Steyer	0.2	\$750	\$150	reviewing earlier correspondence and files for specific Brookdale happy camper declarant	Misc. Research
12/7/2023	Travis Close	1.4	\$850	\$1,190	Legal research re: rules, limitations, and common issues of dispute in propounding & responding to request s for admissions	Discovery (Non-Deposition)
12/7/2023	Travis Close	0.2	\$850	\$170	Email to GBW re: RFA assignment	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/7/2023	Travis Close	0.4	\$850	\$340	Review, analyze, and propose revisions for draft joint letter brief re: service alignment algorithms	Discovery (Non-Deposition)
12/7/2023	Travis Close	1.1	\$850	\$935	Draft RFAs for authentication, #1-28	Discovery (Non-Deposition)
12/7/2023	Travis Close	1.0	\$850	\$850	Draft RFAs for authentication, Set One, #29-62	Discovery (Non-Deposition)
12/7/2023	Travis Close	1.5	\$850	\$1,275	Draft RFAs for authentication of documents, #63-100	Discovery (Non-Deposition)
12/7/2023	Travis Close	0.9	\$850	\$765	Draft RFAs for authentication of documents, Set One, #s 101-128	Discovery (Non-Deposition)
12/7/2023	Travis Close	1.2	\$850	\$1,020	Draft RFAs for authentication of documents, Set One, #s 129-165	Discovery (Non-Deposition)
12/7/2023	Travis Close	1.2	\$850	\$1,020	Draft RFAs for authentication of documents, Set One, #s 166-200	Discovery (Non-Deposition)
12/7/2023	Travis Close	0.3	\$850	\$255	Email to RLS re: list of exhibits in motion for class cert & renewed motion	Trial and Pretrial Preparation
12/8/2023	Guy Wallace	1.3	\$1,350	\$1,755	review and analysis of categories of documents to be sought in connection with merits discovery post-2020	Discovery (Non-Deposition)
12/8/2023	Guy Wallace	1.3	\$1,350	\$1,755	com's with GG; JY; BBK; BU; MTJ; RLS re further discovery tasks	Discovery (Non-Deposition)
12/8/2023	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ; RLS; RAB re Defendants' recent productions of documents and analysis of same	Discovery (Non-Deposition)
12/8/2023	Guy Wallace	0.9	\$1,350	\$1,215	com's with MTJ; RLS; RAB re review of Defendants' recently produced documents; remaining uncoded documents and searches re same	Discovery (Non-Deposition)
12/8/2023	Guy Wallace	0.6	\$1,350	\$810	review and analysis of RLS chart of Brookdale's non-responsive Rule 30(b)(6) testimony	Discovery (Non-Deposition)
12/8/2023	Guy Wallace	0.5	\$1,350	\$675	review and analysis of motion to strike amended declaration of Umpierre; com's with JAU re same	Other Motions
12/8/2023	Jennifer Bybee	1.2	\$925	\$1,110	Conference call with co-counsel re discovery, oppositions to motions to strike and sanctions	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/8/2023	Mark Johnson	0.7	\$1,150	\$805	mtg w/ R Bonner, R Steyer and G Wallace re review of latest document production; analysis and searches of prior productions for trial prep.	Trial and Pretrial Preparation
12/8/2023	Rachel Steyer	1.1	\$750	\$825	weekly zoom meeting with GBW, TCC, MTJ, JUB, RBGG co-counsel to review and discuss tasks and assignments	Case Organization, Planning and Strategy
12/8/2023	Rachel Steyer	3.4	\$750	\$2,550	continuing review of third production, updating memo	Discovery (Non-Deposition)
12/8/2023	Rachel Steyer	0.2	\$750	\$150	email to GBW with questions about tasks	Discovery (Non-Deposition)
12/8/2023	Rachel Steyer	0.2	\$750	\$150	call with GBW to review and discuss outstanding discovery	Discovery (Non-Deposition)
12/8/2023	Rachel Steyer	0.7	\$750	\$525	meeting with GBW, MTJ, RAB to reivew and discuss outstanding discovery searches and tasks	Discovery (Non-Deposition)
12/8/2023	Rachel Steyer	0.2	\$750	\$150	transmitting earlier spreading tracking 30b6 witnesses lack of authentication of docs and policies to GBW, MTJ, JUB, TCC	Discovery (Non-Deposition)
12/8/2023	Rachel Steyer	0.5	\$750	\$375	reviewing defendants' reply to motion to strike	Other Motions
12/8/2023	Rachel Steyer	0.6	\$750	\$450	updating and working on master class cert. motions exhibit	Trial and Pretrial Preparation
12/8/2023	Travis Close	1.8	\$850	\$1,530	Continue drafting master spreadsheet of documents for verification of Genuineness/authenticity in RFAs (#201-265)	Discovery (Non-Deposition)
12/8/2023	Travis Close	1.4	\$850	\$1,190	Continue drafting master spreadsheet of documents for verification of Genuineness/authenticity in RFAs (#265-322)	Discovery (Non-Deposition)
12/8/2023	Travis Close	0.3	\$850	\$255	Email to MTJ re: lists of depo exhibits and new set of RFAs	Discovery (Non-Deposition)
12/8/2023	Travis Close	1.3	\$850	\$1,105	Legal research re: proper format of RFAs requesting verification/genuineness of documents	Discovery (Non-Deposition)
12/8/2023	Travis Close	0.6	\$850	\$510	Review and analyze Def's motion to strike Amended Umpierre declaration	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/8/2023	Travis Close	0.9	\$850	\$765	Team meeting with MTJ, GBW, RLS, co-counsel re: trial preparation, remaining discovery to be served	Trial and Pretrial Preparation
12/9/2023	Guy Wallace	4.3	\$1,350	\$5,805	review and analysis of remaining discovery to be completed re document production, RFA's, depositions; potential motions to compel re same; review and analysis of TCC memo re same	Discovery (Non-Deposition)
12/9/2023	Guy Wallace	0.7	\$1,350	\$945	review and analysis of draft stipulation from MTJ re site inspections; com's with MTJ re same	Discovery (Non-Deposition)
12/9/2023	Guy Wallace	0.4	\$1,350	\$540	com's with JAU re preparation of opposition to second motion to strike; analysis of initial outline of same	Other Motions
12/9/2023	Jennifer Bybee	0.3	\$925	\$278	Draft Opp. to MTS	Other Motions
12/9/2023	Jennifer Bybee	0.2	\$925	\$185	Outline opp. to MTS	Other Motions
12/9/2023	Jennifer Bybee	0.1	\$925	\$93	Review Defendants new MTS Amended Umpierre Decl.	Other Motions
12/9/2023	Jennifer Bybee	2.4	\$925	\$2,220	Research motions to strike; L-R 7-5(b); etc.	Other Motions
12/9/2023	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re opposition to MTS	Other Motions
12/9/2023	Jennifer Bybee	0.9	\$925	\$833	Research LR 7-5(b) and motions to strike	Other Motions
12/9/2023	Mark Johnson	0.3	\$1,150	\$345	call w G Wallace re draft stipulation re site inspections; proposed revisions to same	Discovery (Non-Deposition)
12/9/2023	Mark Johnson	1.8	\$1,150	\$2,070	complete drafting of proposed stipulation re additional site inspections and draft email w/ explanations to co-counsel re same	Discovery (Non-Deposition)
12/9/2023	Mark Johnson	0.6	\$1,150	\$690	make revisions to draft stip re additonal site inspections based on call w G Wallace; draft email re same describing reservations re impact of revisions.	Discovery (Non-Deposition)
12/9/2023	Travis Close	2.4	\$850	\$2,040	Continue drafting chart for genuineness RFAs/authenticity: residency agreements, resident files, and DSS reports	Discovery (Non-Deposition)
12/10/2023	Jennifer Bybee	2.6	\$925	\$2,405	Draft Opp. to MTS	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/10/2023	Jennifer Bybee	0.3	\$925	\$278	Com's with GBW re Opposition to MTS	Other Motions
12/11/2023	Guy Wallace	0.4	\$1,350	\$540	com's with TCC re draft RFA's and revisions re same	Discovery (Non-Deposition)
12/11/2023	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re RFA's and categories of documents for which Plaintiffs reasonably seek authentication	Discovery (Non-Deposition)
12/11/2023	Guy Wallace	1.2	\$1,350	\$1,620	com's with MTJ; TCC; RLS re preparation of RFA's and types of documents for which to seek admissions re authenticity	Discovery (Non-Deposition)
12/11/2023	Guy Wallace	2.1	\$1,350	\$2,835	review and analysis of draft stipulation re alterations and modifications to the six facilities; legal research and analysis re same; revise and edit same; com's with MTJ re same	Other Motions
12/11/2023	Jennifer Bybee	3.9	\$925	\$3,608	Draft Opposition to MTS	Other Motions
12/11/2023	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re Opp. to MTS	Other Motions
12/11/2023	Mark Johnson	1.1	\$1,150	\$1,265	Teams call w G Wallace, R Steyer, T Close re RFAs for document authentication, review Stiner resident file for examples and strategy, categories of documents for which authentication is necessary.	Discovery (Non-Deposition)
12/11/2023	Mark Johnson	1.4	\$1,150	\$1,610	coms w/ G Wallace, R Steyer, B Bien-Kahn and J Yellin re edits to proposed stip re inspection; revise same to incorporate edits and make other changes; send to opposing counsel and draft cover email for same.	Discovery (Non-Deposition)
12/11/2023	Mark Johnson	0.7	\$1,150	\$805	review T Close email and list of docs for RFAs; draft response with recommendations re specific categories.	Discovery (Non-Deposition)
12/11/2023	Mark Johnson	0.7	\$1,150	\$805	call w/ G Wallace re authentication of documents, stip re inspections, D proposal to accelerate hearing on motion to strike	Trial and Pretrial Preparation
12/11/2023	Rachel Steyer	1.4	\$750	\$1,050	completing review of third production	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/11/2023	Rachel Steyer	1.1	\$750	\$825	meeting with MTJ, TCC, GBW to review and discuss RFAs	Discovery (Non-Deposition)
12/11/2023	Rachel Steyer	3.1	\$750	\$2,325	reviewing and preparing chart tracking named plaintiff resident files	Discovery (Non-Deposition)
12/11/2023	Travis Close	1.2	\$850	\$1,020	Legal research on purpose, scope, and limitations to requests for admission	Case Organization, Planning and Strategy
12/11/2023	Travis Close	0.5	\$850	\$425	Review and analyze DSS docs produced for Fountaingrove facility to locate any emergency evacuation plans/supplements	Discovery (Non-Deposition)
12/11/2023	Travis Close	2.4	\$850	\$2,040	Continue drafting chart - Exhibit A - to RFAs for genuineness	Discovery (Non-Deposition)
12/11/2023	Travis Close	1.2	\$850	\$1,020	Draft RFAs for genuineness of documents	Discovery (Non-Deposition)
12/11/2023	Travis Close	0.2	\$850	\$170	Email to MTJ, GBW, RLS re: draft chart of genuineness documents for review	Discovery (Non-Deposition)
12/11/2023	Travis Close	0.6	\$850	\$510	Review and analyze DSS docs produced for Hemet facility to locate any emergency evacuation plans/supplements	Trial and Pretrial Preparation
12/11/2023	Travis Close	0.2	\$850	\$170	Email to GBW, MTJ re: team meeting to discuss RFA chart	Trial and Pretrial Preparation
12/11/2023	Travis Close	0.3	\$850	\$255	Review, analyze, and propose revisions for draft stipulation re: accessibility improvements at facilities	Trial and Pretrial Preparation
12/12/2023	Guy Wallace	0.9	\$1,350	\$1,215	com's with MTJ; RLS; TCC re requests for admission re documents	Discovery (Non-Deposition)
12/12/2023	Guy Wallace	0.4	\$1,350	\$540	com's with RLS re Defendants' recent productions and analysis re same; list of post 2020 materials Defendants' must produce	Discovery (Non-Deposition)
12/12/2023	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of draft of Plaintiffs' RFA's Set One; com's with MTJ; TCC; KS re same	Discovery (Non-Deposition)
12/12/2023	Guy Wallace	1.7	\$1,350	\$2,295	review and analysis of Defendants' motion to strike the declarations of Umpierre; Grunfeld; Wallace	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/12/2023	Guy Wallace	2.1	\$1,350	\$2,835	review and analysis of Defendants' second MTS; Umpierre Declaration; Jacobsen Declaration; com's with MTJ; JAU re same	Other Motions
12/12/2023	Jennifer Bybee	3.1	\$925	\$2,868	Draft Opposition to MTS	Other Motions
12/12/2023	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re Opp. to MTS	Other Motions
12/12/2023	Jennifer Bybee	1.3	\$925	\$1,203	Draft Opposition to MTS	Other Motions
12/12/2023	Jennifer Bybee	0.0	\$925	\$0	Com's with GBW re FRCP 56	Other Motions
12/12/2023	Mark Johnson	0.7	\$1,150	\$805	review draft RFAs re authenticity and Exhibit spreadsheet listing 300+ doc for authentication	Discovery (Non-Deposition)
12/12/2023	Mark Johnson	0.2	\$1,150	\$230	draft emails to T Close, G Wallace with comments, questions re items listed on exhibit to RFA re authenticity.	Discovery (Non-Deposition)
12/12/2023	Mark Johnson	0.3	\$1,150	\$345	calls w/ G Wallace re RFAs re authentication and receipt of documents	Discovery (Non-Deposition)
12/12/2023	Mark Johnson	0.2	\$1,150	\$230	review and respond to emails from Opposing counsel re authenticating documents, meet and confer re same, depositions, letter briefs re discovery	Discovery (Non-Deposition)
12/12/2023	Mark Johnson	0.4	\$1,150	\$460	review email exchanges w/ OC and draft memo/checklist for file and Co counsel re outstanding issues and timeline.	Discovery (Non-Deposition)
12/12/2023	Mark Johnson	0.5	\$1,150	\$575	call w/ G Wallace re motion to strike reply declarations iso mtn for leave	Other Motions
12/12/2023	Mark Johnson	2.4	\$1,150	\$2,760	review D motion to strike portions of B Umpierre reply declaration and prepare comparative analysis of items identified in mtn to paragraphs of declaration	Other Motions
12/12/2023	Mark Johnson	0.3	\$1,150	\$345	call w G Wallace re analysis of D mtn to strike Umpierre reply declaration and strategy for responding to same.	Other Motions
12/12/2023	Rachel Steyer	0.2	\$750	\$150	reviewing email from GBW summarizing categories of documents for additional discovery requests	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/12/2023	Travis Close	0.5	\$850	\$425	Review, analyze, and make revisions/corrections to updated deposition log	Case Organization, Planning and Strategy
12/12/2023	Travis Close	0.4	\$850	\$340	Email to MTJ re: answers to questions about RFAs served	Discovery (Non-Deposition)
12/12/2023	Travis Close	1.4	\$850	\$1,190	Continue drafting/revising RFAs for genuineness of docs, set one	Discovery (Non-Deposition)
12/12/2023	Travis Close	2.3	\$850	\$1,955	Review, analyze, and compile resident files for Def's declarants at named P facilities	Discovery (Non-Deposition)
12/12/2023	Travis Close	2.8	\$850	\$2,380	Continue drafting/revising Exhibit A, list of docs, to RFAs re: genuineness of documents	Discovery (Non-Deposition)
12/12/2023	Travis Close	0.3	\$850	\$255	email to co-counsel re: origin of facility prefix-bates plaintiffs' resident files	Discovery (Non-Deposition)
12/12/2023	Travis Close	0.2	\$850	\$170	Call with GBW re: serving final RFAs on defendants	Discovery (Non-Deposition)
12/13/2023	Guy Wallace	2.1	\$1,350	\$2,835	preparation of further list of categories of documents that must be updated through 2023; review and analysis of current depo exhibit list; email to MTJ; JAU; TCC; RLS re same	Discovery (Non-Deposition)
12/13/2023	Guy Wallace	0.6	\$1,350	\$810	analysis of information from JT re the six facilities and benchmark compliance; com's with JT; MTJ re same	Discovery (Non-Deposition)
12/13/2023	Guy Wallace	0.5	\$1,350	\$675	review and analysis of list of categories of documents for which Plaintiffs seek supplementation; com's with MTJ; RLS re same	Discovery (Non-Deposition)
12/13/2023	Guy Wallace	0.4	\$1,350	\$540	review and analysis of labor to benchmark comparison from JT for the six facilities	Discovery (Non-Deposition)
12/13/2023	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ re demand to Defendants' re supplemental production of categories of documents post-2020 re ESI; policies; procedures; training manuals that apply to the six facilities	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/13/2023	Guy Wallace	0.5	\$1,350	\$675	review and analysis of draft MTC from BBK re transportation policy materials; revise and edit same; com's with BBK; MTJ re same	Other Motions
12/13/2023	Guy Wallace	2.1	\$1,350	\$2,835	review and analysis of draft opposition from JAU to Defendants' second motion to strike; revise and edit same	Other Motions
12/13/2023	Guy Wallace	0.2	\$1,350	\$270	com's with BU re Umpierre reply declaration and Defendants' second MTS	Other Motions
12/13/2023	Jennifer Bybee	1.2	\$925	\$1,110	Draft Opposition to MTS	Other Motions
12/13/2023	Jennifer Bybee	1.3	\$925	\$1,203	Revise draft Opposition to MTS	Other Motions
12/13/2023	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re draft	Other Motions
12/13/2023	Jennifer Bybee	0.1	\$925	\$93	Send email to GBW enclosing brief draft	Other Motions
12/13/2023	Mark Johnson	5.8	\$1,150	\$6,670	review and revise, organize and elaborate on list of docs for which supplementation is required and draft email re same; review docs in doc mgmt system for same	Discovery (Non-Deposition)
12/13/2023	Mark Johnson	1.4	\$1,150	\$1,610	review and code docs related to S Stiner from recent document production	Discovery (Non-Deposition)
12/13/2023	Mark Johnson	0.8	\$1,150	\$920	review and record information re prior document production from Defendants	Discovery (Non-Deposition)
12/13/2023	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW re list of docs for email re supplementation of production	Discovery (Non-Deposition)
12/13/2023	Mark Johnson	0.5	\$1,150	\$575	locate and review Motorized Vehicle Policy and prior briefing from D on issue of burden of identifying transportation class members; email exchange w/ B Bien-Kahn re same.	Other Motions
12/13/2023	Rachel Steyer	0.2	\$750	\$150	response to RAB concerning billing detail by revenue spreadsheets	Discovery (Non-Deposition)
12/13/2023	Rachel Steyer	4.5	\$750	\$3,375	reviewing and compilation of name plaintiff documents for RFAs	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/13/2023	Rachel Steyer	0.3	\$750	\$225	response to MTJ, TCC, GBW concerning categories of docs for supplementation	Discovery (Non-Deposition)
12/13/2023	Rachel Steyer	0.4	\$750	\$300	reviewing notes and documents to identify earlier memos for supplementation	Discovery (Non-Deposition)
12/13/2023	Rachel Steyer	0.3	\$750	\$225	response to MTJ, GBW, TCC with additional info about document categories for supplementation	Discovery (Non-Deposition)
12/13/2023	Travis Close	1.8	\$850	\$1,530	Review and analyze recent productions for updated emergency evacuation plans & fire drills	Case Organization, Planning and Strategy
12/13/2023	Travis Close	0.6	\$850	\$510	Email to MTJ with analysis on trial planning related to emergency evacuation matters	Case Organization, Planning and Strategy
12/13/2023	Travis Close	0.3	\$850	\$255	Email to team seeking feedback on draft communications to Kailes/Cross re trial planning	Case Organization, Planning and Strategy
12/13/2023	Travis Close	0.3	\$850	\$255	Review, analyze, and propose revisions for draft joint letter brief re: fleet safety policy	Case Organization, Planning and Strategy
12/13/2023	Travis Close	0.2	\$850	\$170	Email to MTJ re: plaintiffs' productions for inclusion in RFAs	Case Organization, Planning and Strategy
12/13/2023	Travis Close	2.3	\$850	\$1,955	Review and analyze records of production by plaintiff BJH for docs to include in RFAs/authenticity	Discovery (Non-Deposition)
12/13/2023	Travis Close	0.9	\$850	\$765	Review and analyze records of production by plaintiff Boris for docs to include in RFAs/authenticity	Discovery (Non-Deposition)
12/13/2023	Travis Close	0.5	\$850	\$425	Analysis of marketing materials produced to defendants that were relied upon by our experts	Trial and Pretrial Preparation
12/13/2023	Travis Close	0.7	\$850	\$595	Revisions to emails to Doug Cross & June Kailes re: trial schedule, expert disclosures, and recent updates; send emails	Trial and Pretrial Preparation
12/13/2023	Travis Close	0.3	\$850	\$255	Email to team with question re: authenticating plaintiffs' productions for trial	Trial and Pretrial Preparation
12/14/2023	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ; TCC; RLS re demand to defendant for supplementation of document production	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/14/2023	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ; TCC; RLS re preparation of further sets of RFA's re documents	Discovery (Non-Deposition)
12/14/2023	Guy Wallace	1.1	\$1,350	\$1,485	legal research and analysis re duty to supplement document productions; com's with MTJ re same	Misc. Research
12/14/2023	Guy Wallace	4.9	\$1,350	\$6,615	revise and edit draft opposition to Defendants' second motion to strike	Other Motions
12/14/2023	Guy Wallace	2.5	\$1,350	\$3,375	review and analysis of draft opposition to Defendants' second MTS; legal research and analysis re Local Rule 7-5; com's with JAU re same (.9)	Other Motions
12/14/2023	Jennifer Bybee	1.0	\$925	\$925	Research how LR 7-5 relates to FRCP 56	Other Motions
12/14/2023	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re Rule 56 & LR 7-5	Other Motions
12/14/2023	Jennifer Bybee	0.7	\$925	\$648	Com's with GBW re Opp. to MTS and applicable standards	Other Motions
12/14/2023	Mark Johnson	4.6	\$1,150	\$5,290	continue reviewing and identifying doc categories for supplementation; coms w/ R Steyer, T Close and G Wallace re same; revise list and finish drafting email to OC re same.	Discovery (Non-Deposition)
12/14/2023	Mark Johnson	0.8	\$1,150	\$920	email exchanges w/ J Thornton, R Bonner re production of Labor Detail reports; scope of same; review LDRs in relativity and as prepared for production to Thornton and approve same.	Trial and Pretrial Preparation
12/14/2023	Mark Johnson	0.6	\$1,150	\$690	calls and emails w/ G Wallace re affirmative duty to supplement production of documents; scope of docs for which supplementation should be sought;	Trial and Pretrial Preparation
12/14/2023	Mark Johnson	2.3	\$1,150	\$2,645	review document production and update master overview list of all docs produced; email to SW team re same	Trial and Pretrial Preparation
12/14/2023	Rachel Steyer	0.2	\$750	\$150	reviewing email from MTJ outlining revised list of categories of docs for supplementation	Discovery (Non-Deposition)
12/14/2023	Rachel Steyer	5.1	\$750	\$3,825	ongoing review of production for RFAs	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/14/2023	Rachel Steyer	0.2	\$750	\$150	call with GBW to discuss shift report documents for RFAs	Discovery (Non-Deposition)
12/14/2023	Rachel Steyer	0.2	\$750	\$150	reviewing chart from MTJ summarizing production status	Discovery (Non-Deposition)
12/14/2023	Travis Close	1.0	\$850	\$850	Review and analyze communications between our firm and Brookdale residents that have been uploaded in BKD productions	Case Organization, Planning and Strategy
12/14/2023	Travis Close	0.4	\$850	\$340	Call with GBW re: schedule for RFAs submissions this week & next	Case Organization, Planning and Strategy
12/14/2023	Travis Close	0.3	\$850	\$255	Email to MTJ re: analysis of community norms spreadsheet	Case Organization, Planning and Strategy
12/14/2023	Travis Close	1.2	\$850	\$1,020	Review and analyze docs labeled "Hot" after initial review for inclusion in RFA chart -- BKD0005114-BKD0264207	Discovery (Non-Deposition)
12/14/2023	Travis Close	0.9	\$850	\$765	Review and analyze docs labeled "Hot" after initial review for inclusion in RFA chart -- BKD0264207-BKD1628006	Discovery (Non-Deposition)
12/14/2023	Travis Close	1.4	\$850	\$1,190	Analysis of ED call agendas for inclusion in RFA authentication chart	Discovery (Non-Deposition)
12/14/2023	Travis Close	1.3	\$850	\$1,105	Review and analyze communications between plaintiffs' firms and residence that have been received by Brookdale residents or employees, for inclusion in RFA chart	Discovery (Non-Deposition)
12/14/2023	Travis Close	1.4	\$850	\$1,190	Review and analyze records from Bernie Jestrabek-Hart (Pltfs' production) for important docs to include in RFA chart	Discovery (Non-Deposition)
12/14/2023	Travis Close	0.4	\$850	\$340	Email to team re: progress on RFAs authentication document review and issues	Trial and Pretrial Preparation
12/14/2023	Travis Close	1.6	\$850	\$1,360	Analyze exhibits from GBW Reply declaration for inclusion in RFA chart (Exhs. 1-75)	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/15/2023	Guy Wallace	0.5	\$1,350	\$675	preparation for meeting with co-counsel re discovery tasks; expert discovery schedule; motions to compel; supplemental responses and disclosures	Discovery (Non-Deposition)
12/15/2023	Guy Wallace	0.8	\$1,350	\$1,080	zoom with GCG; JY; BBK; AX; AS; MTJ; JAU; TCC; RLS re discovery; supplemental responses and disclosures; motions to compel; discovery schedule	Discovery (Non-Deposition)
12/15/2023	Guy Wallace	0.6	\$1,350	\$810	legal research and analysis re proportionality standard re discovery; com's with MTJ re same and impact on pending discovery disputes	Discovery (Non-Deposition)
12/15/2023	Guy Wallace	0.4	\$1,350	\$540	com's with opposing counsel; MTJ re discovery disputes, meet and confer, expert disclosure deadlines, conference with MJ Beeler	Discovery (Non-Deposition)
12/15/2023	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ; RLS; RAB re Defendants' production of emergency evacuation materials that identify residents who use mobility devices	Discovery (Non-Deposition)
12/15/2023	Guy Wallace	0.4	\$1,350	\$540	review and analysis of second set of RFAs re authenticity; com's with TCC re same	Discovery (Non-Deposition)
12/15/2023	Guy Wallace	3.4	\$1,350	\$4,590	revise and edit draft of opposition to Defendants' second MTS	Other Motions
12/15/2023	Guy Wallace	2.7	\$1,350	\$3,645	revise and edit draft opposition to Defendants' second motion to strike; sections re statements objected to in Umpierre, Grunfeld and Wallace Reply Declarations	Other Motions
12/15/2023	Guy Wallace	0.5	\$1,350	\$675	review and analysis of draft brief re motion for sanctions; com's with AS and RBGG re same	Other Motions
12/15/2023	Guy Wallace	0.7	\$1,350	\$945	preparation and drafting of further arguments for opposition to Defendants' second MTS	Other Motions
12/15/2023	Jennifer Bybee	0.7	\$925	\$648	Zoom meeting with co-counsel re discovery etc.	Case Organization, Planning and Strategy
12/15/2023	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re drafting Opp. to MTS	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/15/2023	Mark Johnson	0.4	\$1,150	\$460	draft email to opposing counsel re delays in getting D section of letter brief on benchmark formula, failure to respond to inquiry re reciprocal depositions of declarants, meeting and conferring on contention that rogs served seek wholly immaterial information, review docs and past communications for same	Discovery (Non-Deposition)
12/15/2023	Mark Johnson	0.2	\$1,150	\$230	draft emails to Opposing counsel re proposal for discovery conference, expert disclosure dates	Discovery (Non-Deposition)
12/15/2023	Mark Johnson	4.3	\$1,150	\$4,945	research, draft and finalize P section of joint letter brief re exceeding 25 interrogatories for Stiner and Carlson rogs	Other Motions
12/15/2023	Mark Johnson	0.1	\$1,150	\$115	emails w/ J Thornton and Ryan Bonner re production of weekly Labor Detail reports and format of same	Trial and Pretrial Preparation
12/15/2023	Mark Johnson	0.2	\$1,150	\$230	call w/ T Close re June Kailes expert disclosures and trial testimony, documents related to same.	Trial and Pretrial Preparation
12/15/2023	Mark Johnson	0.8	\$1,150	\$920	review docs on Relativity for additional authentication / supplementation requests, including emergency evacuation documents, staffing reports, etc.; coms w/ SW colleagues re same.	Trial and Pretrial Preparation
12/15/2023	Rachel Steyer	0.6	\$750	\$450	zoom with RBGG co-counsel, JUB, MTJ, GBW, TCC to review and discuss outstanding tasks and assignments	Case Organization, Planning and Strategy
12/15/2023	Rachel Steyer	4.8	\$750	\$3,600	ongoing review of named plaintiff files and gathering for RFAs	Discovery (Non-Deposition)
12/15/2023	Rachel Steyer	0.2	\$750	\$150	call with GBW to review and discuss outstanding RFA related questions	Discovery (Non-Deposition)
12/15/2023	Rachel Steyer	0.2	\$750	\$150	reviewing draft Ps section of joint disc letter brief circulated by MTJ re ROGs	Discovery (Non-Deposition)
12/15/2023	Rachel Steyer	0.2	\$750	\$150	reviewing draft of plaintiffs response to motion for sanctions shared by RBGG	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/15/2023	Travis Close	0.2	\$850	\$170	Email to team re: draft RFAs, set two, for review	Case Organization, Planning and Strategy
12/15/2023	Travis Close	0.3	\$850	\$255	Review and analyze draft opposition to (second) motion for sanctions	Case Organization, Planning and Strategy
12/15/2023	Travis Close	0.3	\$850	\$255	Call to MTJ re: emergency evacuation testimony at trial	Case Organization, Planning and Strategy
12/15/2023	Travis Close	2.2	\$850	\$1,870	Finish preparing RFAs, Set Two, and serve on defendants	Discovery (Non-Deposition)
12/15/2023	Travis Close	2.4	\$850	\$2,040	Review, analyze, and compile exhibits from GBW Reply Decl. into discovery chart for RFAs, set two	Discovery (Non-Deposition)
12/15/2023	Travis Close	0.7	\$850	\$595	Team meeting re: strategy for remaining discovery, expert disclosures, trial prep	Trial and Pretrial Preparation
12/15/2023	Travis Close	0.6	\$850	\$510	Review and analyze def's emergency evacuation evidence submitted in opposing pltf's motion for class cert for purpose of planning testimony at trial	Trial and Pretrial Preparation
12/16/2023	Guy Wallace	0.3	\$1,350	\$405	review and analysis of list of issues to be addressed in discovery conference; com's with MTJ re same	Discovery (Non-Deposition)
12/16/2023	Guy Wallace	1.6	\$1,350	\$2,160	revise and edit draft of opposition brief re Defendants' second MTS	Other Motions
12/16/2023	Guy Wallace	0.7	\$1,350	\$945	review and analysis of further draft of opposition to Defendants' second motion to strike; revise and edit same; com's with JAU re same	Other Motions
12/16/2023	Jennifer Bybee	4.2	\$925	\$3,885	Draft Opp. to MTS	Other Motions
12/16/2023	Jennifer Bybee	0.1	\$925	\$93	Draft email to co-counsel enclosing draft Opp. to MTS	Other Motions
12/16/2023	Mark Johnson	2.5	\$1,150	\$2,875	research legal entity relationships and information for six facilities in anticipation of ownership arguments at trial; draft memo re same.	Trial and Pretrial Preparation
12/16/2023	Rachel Steyer	0.8	\$750	\$600	reviewing JUB draft opposition to def's motion to strike	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/17/2023	Guy Wallace	1.5	\$1,350	\$2,025	legal research and analysis re proportionality and potential impact on scope of discovery; schedule; need for discovery conference re multiple issues with MJ Beeler	Discovery (Non-Deposition)
12/17/2023	Jennifer Bybee	0.2	\$925	\$185	Review Amended MTS	Other Motions
12/17/2023	Jennifer Bybee	0.2	\$925	\$185	Review and incorporate RLS edits into draft Opp. Decl.	Other Motions
12/17/2023	Jennifer Bybee	0.1	\$925	\$93	Review J. Yelin edits to brief	Other Motions
12/17/2023	Mark Johnson	1.2	\$1,150	\$1,380	review and propose edits to opposition to mtn to strike Umpierre declaration iso mtn for leave	Other Motions
12/17/2023	Mark Johnson	0.6	\$1,150	\$690	finalize memo re legal relationships w/r/t six facilities for trial.	Trial and Pretrial Preparation
12/17/2023	Rachel Steyer	1.7	\$750	\$1,275	ongoing review of name plaintiff files for RFAs	Discovery (Non-Deposition)
12/17/2023	Travis Close	0.2	\$850	\$170	Email to MTJ re: 2017 letter from Stacia about barriers in her room	Case Organization, Planning and Strategy
12/17/2023	Travis Close	1.3	\$850	\$1,105	Review and analyze results for resident council minutes at Hemet facility (missing)	Case Organization, Planning and Strategy
12/17/2023	Travis Close	1.3	\$850	\$1,105	Review and analyze resident council minutes for San Ramon facility for inclusion in RFA chart	Trial and Pretrial Preparation
12/18/2023	Guy Wallace	0.7	\$1,350	\$945	review and analysis of documents re named plaintiffs' resident files; RFA's re same; com's with TCC; RLS re same	Discovery (Non-Deposition)
12/18/2023	Guy Wallace	0.4	\$1,350	\$540	analysis of key discovery materials not yet produced by Brookdale; impact on case schedule	Discovery (Non-Deposition)
12/18/2023	Guy Wallace	3.3	\$1,350	\$4,455	review and analysis of further draft of opposition to Defendants' second MTS; revise and edit same; com's with JAU re same (.9)	Other Motions
12/18/2023	Guy Wallace	0.5	\$1,350	\$675	review and analysis of draft request for discovery conference with MJ Beeler; com's with MTJ re same	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/18/2023	Guy Wallace	0.6	\$1,350	\$810	review and analysis of Defendants' MTS amended declaration of Umpierre; com's with JAU re same	Other Motions
12/18/2023	Jennifer Bybee	1.0	\$925	\$925	Incorporate RBGG and MTJ edits into draft Opposition to MTS	Other Motions
12/18/2023	Jennifer Bybee	0.3	\$925	\$278	Com's with GBW re Opp. to MTS and Opp. to MTS 2	Other Motions
12/18/2023	Jennifer Bybee	0.1	\$925	\$93	Email enclosing MTS 1 and 2 for compare to LEC and TBS	Other Motions
12/18/2023	Jennifer Bybee	0.7	\$925	\$648	Review compare document of MTS 1 and MTS 2	Other Motions
12/18/2023	Jennifer Bybee	1.2	\$925	\$1,110	Draft outline of differences among MTS 1 and MTS 2	Other Motions
12/18/2023	Jennifer Bybee	0.4	\$925	\$370	Review and edit TOC / TOA	Other Motions
12/18/2023	Jennifer Bybee	0.3	\$925	\$278	Finalize and circulate draft Opp. to MTS	Other Motions
12/18/2023	Jennifer Bybee	0.3	\$925	\$278	Com's with GBW re statement of the issues	Other Motions
12/18/2023	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re Opp. to MTS Amended Umpierre Decl.	Other Motions
12/18/2023	Mark Johnson	0.6	\$1,150	\$690	review D supplemental response to BJH rog re access improvements; coms w/ R Steyer re analysis of same; review docs and summary of same for analysis of whether to demand actual responses instead of references to documents.	Discovery (Non-Deposition)
12/18/2023	Mark Johnson	0.4	\$1,150	\$460	call w/ G Wallace re additional RFAs re authenticity; review list of docs for third set for RFAs and email coms re same.	Discovery (Non-Deposition)
12/18/2023	Mark Johnson	1.0	\$1,150	\$1,150	review and analyze revised Ds section of joint letter brief re staffing benchmarks and revised declaration iso same; draft email to Thornton and Marks seeking input re same.	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/18/2023	Mark Johnson	4.7	\$1,150	\$5,405	draft request for discovery case management conference; research prior communications w/ opposing counsel and pleadings for same; review edits from R Steyer and finalize	Other Motions
12/18/2023	Rachel Steyer	1.0	\$750	\$750	reviewing categories of documents and summarizing findings in response to ROGs to GBW and MTJ	Discovery (Non-Deposition)
12/18/2023	Rachel Steyer	3.2	\$750	\$2,400	completing review of name plaintiff files and records, identifying for RFAs	Discovery (Non-Deposition)
12/18/2023	Rachel Steyer	0.8	\$750	\$600	review of DSS citation exhibits and preparing list for GBW	Discovery (Non-Deposition)
12/18/2023	Rachel Steyer	0.3	\$750	\$225	reviewing MTJ draft request for discovery CMC	Discovery (Non-Deposition)
12/18/2023	Rachel Steyer	0.5	\$750	\$375	beginning to compile BKD expert materials for RFAs	Discovery (Non-Deposition)
12/18/2023	Rachel Steyer	0.2	\$750	\$150	reviewing MTJ memo summarizing ownership status of six facilities	Misc. Research
12/18/2023	Rachel Steyer	0.5	\$750	\$375	reviewing class member declarations and compiling facts re potential wrongful death	Misc. Research
12/18/2023	Travis Close	0.6	\$850	\$510	Emails to GBW re: progress and strategy on RFAs, Set Three	Case Organization, Planning and Strategy
12/18/2023	Travis Close	2.3	\$850	\$1,955	Review and analyze Fire Drill reports for Brookhurst, Fountaingrove, San Ramon, Scotts Valley, Tracy facilities, for inclusion in RFAs	Discovery (Non-Deposition)
12/18/2023	Travis Close	1.7	\$850	\$1,445	Review and analyze emails marked "Privileged & Confidential" for inclusion in authentication RFAs	Discovery (Non-Deposition)
12/18/2023	Travis Close	0.5	\$850	\$425	Emails to RLS re: assignments for authentication RFAs & docs to include	Discovery (Non-Deposition)
12/18/2023	Travis Close	2.1	\$850	\$1,785	Review, analyze, and organize emergency evacuation forms for plaintiffs' facilities for inclusion in RFAs	Discovery (Non-Deposition)
12/18/2023	Travis Close	1.2	\$850	\$1,020	Review, analyze, and propose revisions for opposition to motion to strike	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/18/2023	Travis Close	0.5	\$850	\$425	Legal research on FRCP 56(c), (e), and Local Rule 7-5(b), for info on proper content for attorney decarations	Pleadings and Motions Re: Pleadings
12/18/2023	Travis Close	0.6	\$850	\$510	Review and analyze DSS regulations for emergency evacuation requirements & forms	Trial and Pretrial Preparation
12/19/2023	Guy Wallace	0.7	\$1,350	\$945	review and analysis of draft supplemental interrogatory responses; com's with JY; MTJ re same	Discovery (Non-Deposition)
12/19/2023	Guy Wallace	1.4	\$1,350	\$1,890	com's with MTJ re preparation for meet and confer with Defendants' re discovery issues; conference with MJ Beeler; case schedule	Discovery (Non-Deposition)
12/19/2023	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of draft request for discovery conference with MJ Beeler; revise and edit same	Other Motions
12/19/2023	Guy Wallace	0.5	\$1,350	\$675	review and analysis of MTC re class list re transportation class; com's with BBK re same	Other Motions
12/19/2023	Guy Wallace	3.8	\$1,350	\$5,130	revise and edit draft request for discovery conference; com's with MTJ re same (.7)	Other Motions
12/19/2023	Guy Wallace	0.4	\$1,350	\$540	review and analysis of Defendants' portion of letter brief re benchmark formula; com's with MTJ re potential further information from Schroyer	Other Motions
12/19/2023	Guy Wallace	0.3	\$1,350	\$405	review and analysis of Defendants' administrative motion re schedule on motions to strike and for sanctions	Other Motions
12/19/2023	Guy Wallace	0.5	\$1,350	\$675	com's with JY; JAU re revisions to draft of Plaintiffs' opposition to amended MTS declaration of Umpierre	Other Motions
12/19/2023	Guy Wallace	0.5	\$1,350	\$675	review and analysis of draft MTC re limit on interrogatories; com's with JY; MTJ; RLS re same	Other Motions
12/19/2023	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re Opp to Amended MTD	Other Motions
12/19/2023	Jennifer Bybee	3.2	\$925	\$2,960	Draft Opp. to MTD Amended Umpierre Decl.	Other Motions
12/19/2023	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re format of Opp. to MTS 2	Other Motions
12/19/2023	Jennifer Bybee	0.9	\$925	\$833	Draft revised version of Opp. to Amended MTS	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/19/2023	Mark Johnson	1.2	\$1,150	\$1,380	call w/ G Wallace re strategy on various discovery issues, including meet and confer call w/ OC on authenticity of documents; request for discovery case mgmt conference, inspections or stipulation re modifications to property, depositions, impact on case schedule of outstanding discovery and moving discovery cut-off date.	Discovery (Non-Deposition)
12/19/2023	Mark Johnson	1.8	\$1,150	\$2,070	revise draft of request for discovery case management conference, including edits from G Wallace and RBGG and to adjust for emails from OC	Discovery (Non-Deposition)
12/19/2023	Mark Johnson	0.5	\$1,150	\$575	review and analyze D section of brief on transportation class list contact information and 6 declarations supporting same; email B Bien Kahn and G Wallace re thoughts about same	Other Motions
12/19/2023	Mark Johnson	0.6	\$1,150	\$690	email exchanges and call w/ G Wallace, B Bien-Kahn re letter brief on transportation class list, review potential additional exhibits re same	Other Motions
12/19/2023	Mark Johnson	1.5	\$1,150	\$1,725	review Bertino email re position on excess interrogatories; draft revisions to P section of joint ltr brief to reflect same, coms w/ Wallace, Yelin, Steyer re same.	Other Motions
12/19/2023	Mark Johnson	2.4	\$1,150	\$2,760	work on gathering documents and information for Stacy Stiner trial prep and supplementing discovery responses	Trial and Pretrial Preparation
12/19/2023	Rachel Steyer	0.5	\$750	\$375	reviewing draft supplemental ROG responses for Ps	Discovery (Non-Deposition)
12/19/2023	Rachel Steyer	1.5	\$750	\$1,125	preparing and updating master exhibit list	Discovery (Non-Deposition)
12/19/2023	Rachel Steyer	0.2	\$750	\$150	reviewing and calculating total of D's ROGS served	Discovery (Non-Deposition)
12/19/2023	Rachel Steyer	0.2	\$750	\$150	reviewing revised portion of disocvery letter brief circulated by MTJ re interrogatory limit	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/19/2023	Rachel Steyer	2.1	\$750	\$1,575	reviewing staffing expert docs and preparing list for third set of RFAs	Experts (Including Retention)
12/19/2023	Rachel Steyer	0.4	\$750	\$300	reviewing defendants portion of joint discovery letter brief and exhibits re transportation list/class info	Other Motions
12/19/2023	Rachel Steyer	0.3	\$750	\$225	reviewing and editing GBW revisions to request for discovery conference	Other Motions
12/19/2023	Rachel Steyer	0.5	\$750	\$375	reviewing JUB draft MTS amended Umpierre declaration	Other Motions
12/19/2023	Rachel Steyer	0.2	\$750	\$150	reviewing defendants motion to accelerate hearing on sanctions/MTS	Other Motions
12/19/2023	Travis Close	0.3	\$850	\$255	Review and analyze draft joint letter brief re: production of transportation class list	Case Organization, Planning and Strategy
12/19/2023	Travis Close	0.4	\$850	\$340	Review, analyze, & propose revisions for draft joint letter brief re: request for case management conference	Case Organization, Planning and Strategy
12/19/2023	Travis Close	0.5	\$850	\$425	Review, analyze, and organize raw staffing/assessment/move out data relied upon by staffing experts for RFA authentication	Case Organization, Planning and Strategy
12/19/2023	Travis Close	0.5	\$850	\$425	Prepare draft of Set 3 of RFAs - authentication of documents	Discovery (Non-Deposition)
12/19/2023	Travis Close	0.8	\$850	\$680	Review and analyze transportation-related emails produced for Brookhurst facility for incorporation into RFA authentication chart	Trial and Pretrial Preparation
12/19/2023	Travis Close	0.7	\$850	\$595	Review and analyze transportation-related emails produced for Hemet facility for incorporation into RFA authentication chart	Trial and Pretrial Preparation
12/19/2023	Travis Close	0.8	\$850	\$680	Review and analyze transportation-related emails produced for Fountaingrove facility for incorporation into RFA authentication chart	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/19/2023	Travis Close	0.6	\$850	\$510	Review and analyze transportation-related emails produced for Scotts Valley facility for incorporation into RFA authentication chart	Trial and Pretrial Preparation
12/19/2023	Travis Close	0.7	\$850	\$595	Review and analyze transportation-related emails produced for San Ramon facility for incorporation into RFA authentication chart	Trial and Pretrial Preparation
12/19/2023	Travis Close	0.2	\$850	\$170	Emails to GBW re: updates on RFA assignment progress	Trial and Pretrial Preparation
12/19/2023	Travis Close	1.5	\$850	\$1,275	Review and analyze declarations of Belson, Jones, and Kennedy, for BKD-produced docs to be incorporated into RFA authentication chart	Trial and Pretrial Preparation
12/19/2023	Travis Close	1.3	\$850	\$1,105	Draft summary of categories of docs included in RFAs for authentication	Trial and Pretrial Preparation
12/20/2023	Guy Wallace	0.7	\$1,350	\$945	review and analysis of emails from Rutner; Bertino re various discovery issues	Discovery (Non-Deposition)
12/20/2023	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of materials for which Plaintiffs seek supplementation; com's with MTJ; RLS re same	Discovery (Non-Deposition)
12/20/2023	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ; TCC; RLS re RFA's re authenticity	Discovery (Non-Deposition)
12/20/2023	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of types of documents that Defendants have not produced since 2021; com's with RLS re same	Discovery (Non-Deposition)
12/20/2023	Guy Wallace	1.7	\$1,350	\$2,295	review and analysis of draft supplemental interrogatory responses re Algarme; revise and edit same	Discovery (Non-Deposition)
12/20/2023	Guy Wallace	0.5	\$1,350	\$675	legal research and analysis re Ninth Circuit decision re Langer v. Kiser; scope of standing in access cases	Misc. Research
12/20/2023	Guy Wallace	0.5	\$1,350	\$675	legal research and analysis re remedies available under the Unruh Act	Misc. Research
12/20/2023	Jennifer Bybee	0.7	\$925	\$648	Finalize draft of Reply brief	Other Motions
12/20/2023	Jennifer Bybee	0.1	\$925	\$93	Incorporate GBW redline	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/20/2023	Rachel Steyer	0.5	\$750	\$375	call with GBW to review and discuss various tasks and assignments pertaining to discovery, trial prep	Case Organization, Planning and Strategy
12/20/2023	Rachel Steyer	0.2	\$750	\$150	call with GBW to review and discuss outstanding tasks and assignments	Case Organization, Planning and Strategy
12/20/2023	Rachel Steyer	3.6	\$750	\$2,700	preparing and updating revised master exhibit list	Discovery (Non-Deposition)
12/20/2023	Rachel Steyer	0.2	\$750	\$150	call with GBW to review and discuss outstanding categories of documents list	Discovery (Non-Deposition)
12/20/2023	Rachel Steyer	1.1	\$750	\$825	reviewing list of category of documents for supplementation and checking recent productions, adding in notes	Discovery (Non-Deposition)
12/20/2023	Rachel Steyer	0.7	\$750	\$525	reviewing JUB revised draft oppositon to MTS	Other Motions
12/20/2023	Travis Close	2.7	\$850	\$2,295	Draft Pltfs' RFAs, Set three	Discovery (Non-Deposition)
12/20/2023	Travis Close	0.8	\$850	\$680	Prepare & format RFAs, set three (authentication) and serve on Defendants	Discovery (Non-Deposition)
12/20/2023	Travis Close	1.4	\$850	\$1,190	Review and analyze resident complaints re: emergency evacuation at pltfs' facilities in Issue Registers	Discovery (Non-Deposition)
12/20/2023	Travis Close	0.4	\$850	\$340	Call with GBW re: finalizing and completeness of RFAs, Set Three (authentication)	Discovery (Non-Deposition)
12/20/2023	Travis Close	0.4	\$850	\$340	Review, analyze, and propose revisions for draft opposition to MTS amended Decl. of Umpierre	Discovery (Non-Deposition)
12/20/2023	Travis Close	0.6	\$850	\$510	Draft outline for tomorrow's call with June Kailes re: trial prep/schedule/strategy	Experts (Including Retention)
12/20/2023	Travis Close	1.7	\$850	\$1,445	Review and analyze resident complaints re: emergency evacuation at pltfs' facilities in emails produced by Brookdale	Trial and Pretrial Preparation
12/21/2023	Guy Wallace	0.9	\$1,350	\$1,215	com's with OC; BBK; MTJ re Defendants' Fleet Safety Policy (FSP) and discovery and MTC re same	Discovery (Non-Deposition)
12/21/2023	Guy Wallace	0.8	\$1,350	\$1,080	com's with Kailes re expert report; TCC	Discovery (Non-Deposition)
12/21/2023	Guy Wallace	0.4	\$1,350	\$540	com's with RLS re analysis of Defendants' Rule 30(b)(6) testimony and authentication of documents	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/21/2023	Guy Wallace	1.2	\$1,350	\$1,620	com's with OC; MTJ re Defendants' responses re discovery issues and MTC's re same	Discovery (Non-Deposition)
12/21/2023	Guy Wallace	0.9	\$1,350	\$1,215	com's with MTJ re Defendants' proposed stipulation re site inspections; analysis of Defendants' draft of same and problems re same; com's with OC re same	Discovery (Non-Deposition)
12/21/2023	Guy Wallace	0.4	\$1,350	\$540	com's with JAU re opposition to Defendants' MTS re Amended Umpierre Declaration	Other Motions
12/21/2023	Jennifer Bybee	1.2	\$925	\$1,110	Edit and revise draft Opp. to Amended MTS	Other Motions
12/21/2023	Rachel Steyer	0.2	\$750	\$150	reviewing defendants' revisions to joint discovery letter brief re production of transportation class contact info	Discovery (Non-Deposition)
12/21/2023	Rachel Steyer	5.7	\$750	\$4,275	review of 30b6 witness chart, creating separate chart specifically for authentication of exhibit issues	Discovery (Non-Deposition)
12/21/2023	Rachel Steyer	0.3	\$750	\$225	reviewing defendants brief re discovery conference	Discovery (Non-Deposition)
12/21/2023	Rachel Steyer	0.2	\$750	\$150	call with GBW to review and discuss chart re witnesses and authentication of docs	Trial and Pretrial Preparation
12/21/2023	Travis Close	0.3	\$850	\$255	Review and analyze filed version of joint letter brief re: staffing algorithms & Def's exhibits re: burden	Discovery (Non-Deposition)
12/21/2023	Travis Close	0.3	\$850	\$255	Review and analyze def's request for discovery conference & nine exhibits	Discovery (Non-Deposition)
12/21/2023	Travis Close	1.2	\$850	\$1,020	Call with June Kailes, GBW re: trial planning, rule 26 reports	Experts (Including Retention)
12/21/2023	Travis Close	1.7	\$850	\$1,445	Legal research on content, format, and common issues for litigation in rule 26 expert reports	Experts (Including Retention)
12/21/2023	Travis Close	1.3	\$850	\$1,105	Research prior cases in which Kailes, J. has provided expert testimony for expert report examples	Experts (Including Retention)
12/21/2023	Travis Close	1.3	\$850	\$1,105	Analyze & gather updated emergency plans from six facilities for June Kailes	Experts (Including Retention)
12/21/2023	Travis Close	0.4	\$850	\$340	Review and analyze revised ver of second MTN to strike, with comments	Pleadings and Motions Re: Pleadings
12/21/2023	Travis Close	0.3	\$850	\$255	Email to team de-briefing today's call with experts	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/22/2023	Guy Wallace	1.3	\$1,350	\$1,755	review and analysis of draft MTC re site inspections	Other Motions
12/22/2023	Jennifer Bybee	0.3	\$925	\$278	Com's with GBW re class certification and expert inspections	Class Certification
12/22/2023	Mark Johnson	0.6	\$1,150	\$690	review Bowman 30b6 depo testimony re transportation and fleet safety policy; email to G Wallace summarizing same	Discovery (Non-Deposition)
12/22/2023	Mark Johnson	1.8	\$1,150	\$2,070	email communications with Co counsel re draft mtn re new inspections; revise section of joint letter brief base on input and own review; call w/ J Yelin re decision and strategy (.3); draft email to Ds with draft ltr brief	Other Motions
12/22/2023	Rachel Steyer	0.3	\$750	\$225	reviewing MTJ draft joint letter brief to compel Rule 34 inspection of facilities	Discovery (Non-Deposition)
12/22/2023	Rachel Steyer	0.2	\$750	\$150	reviewing defendants' portion of joint letter brief re fleet safety policy	Discovery (Non-Deposition)
12/22/2023	Rachel Steyer	0.7	\$750	\$525	completing review of 30b6 witness chart for document authentication issues	Trial and Pretrial Preparation
12/22/2023	Rachel Steyer	2.6	\$750	\$1,950	ongoing work on master exhibit list	Trial and Pretrial Preparation
12/22/2023	Travis Close	0.4	\$850	\$340	Review, analyze, and propose revisions for draft joint letter brief re: updated facility inspections	Case Organization, Planning and Strategy
12/22/2023	Travis Close	0.7	\$850	\$595	Review, analyze, and collect emails discussing evacuation concerns at Brookhurst facility	Experts (Including Retention)
12/22/2023	Travis Close	0.7	\$850	\$595	Review, analyze, and collect emails discussing evacuation concerns at Fountaingrove facility	Experts (Including Retention)
12/22/2023	Travis Close	1.6	\$850	\$1,360	Review, analyze, and organize client files related to evacuation at plaintiffs' facilities	Trial and Pretrial Preparation
12/23/2023	Guy Wallace	0.7	\$1,350	\$945	preparation of plan re Rule 26 experts disclosures and reports & schedule re same	Experts (Including Retention)
12/23/2023	Guy Wallace	1.1	\$1,350	\$1,485	legal research and analysis re enforceability of Defendants' purported pre-litigation jury trial waivers in the Residency Agreements	Misc. Research

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/23/2023	Guy Wallace	1.7	\$1,350	\$2,295	legal research and analysis re standing for injunctive relief based on facts at time of complaint and deterrence from returning to facility for purposes of visiting and/or determining compliance with ADA	Misc. Research
12/23/2023	Guy Wallace	0.6	\$1,350	\$810	review and analysis of discovery Order from MJ Beeler	Other Motions
12/23/2023	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re response to MJ Beeler Order of 12/22/23	Other Motions
12/26/2023	Rachel Steyer	7.3	\$750	\$5,475	ongoing work on preparing master class cert. exhibit list	Trial and Pretrial Preparation
12/26/2023	Travis Close	1.3	\$850	\$1,105	Review and analyze national fire prevention association's guidance for evacuation plans for ppl with disabilities	Case Organization, Planning and Strategy
12/26/2023	Travis Close	0.8	\$850	\$680	Analysis of Kailes' prior opinions in case to determine extent of updates required	Case Organization, Planning and Strategy
12/26/2023	Travis Close	1.6	\$850	\$1,360	Review and analyze info from City of Santa Rosa re: evacuations during Tubbs Fire	Case Organization, Planning and Strategy
12/26/2023	Travis Close	0.8	\$850	\$680	Begin drafting outline for expert report by Kailes, J.	Case Organization, Planning and Strategy
12/26/2023	Travis Close	1.6	\$850	\$1,360	Review and analyze FEMA's emergency evacuation resources for people with disabilities	Case Organization, Planning and Strategy
12/26/2023	Travis Close	0.8	\$850	\$680	Review and analyze recent facility evaluation and complaint investigation reports issued for Danville, Central Whittier, Sylvan Ranch, Scotts Valley, Paulin Creek, Kettleman Lane, Lodi, and San Marcos facilities	Case Organization, Planning and Strategy
12/26/2023	Travis Close	0.7	\$850	\$595	Legal research on federal guidance, rules, and regs for procuring accessible transportation during emergency events	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/26/2023	Travis Close	0.5	\$850	\$425	Review and analyze draft supplemental responses to ROGs to ensure consistency among plaintiffs	Discovery (Non-Deposition)
12/27/2023	Guy Wallace	0.6	\$1,350	\$810	com's with JY; MTJ re response re MJ Beeler's Order of 12/22/23; analysis of same	Discovery (Non-Deposition)
12/27/2023	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ re further discovery issues to be addressed in meet and confer	Discovery (Non-Deposition)
12/27/2023	Guy Wallace	3.2	\$1,350	\$4,320	analysis of further discovery needed re six facilities; emergency evacuation issues; staffing issues; analysis of standing issues re Algarne and Ninth Circuit precedent re same and discovery responses re same; analysis of documents that need to be supplemented	Discovery (Non-Deposition)
12/27/2023	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ re com's with MJ Beeler and Order of 12/22; com's with OC re schedule	Discovery (Non-Deposition)
12/27/2023	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of documents and categories of documents that require supplementation	Discovery (Non-Deposition)
12/27/2023	Guy Wallace	1.2	\$1,350	\$1,620	further review and analysis of documents and categories of documents that require supplementation by Defendants	Discovery (Non-Deposition)
12/27/2023	Mark Johnson	0.4	\$1,150	\$460	call with J Yelin, joined by G Wallace re strategy for seeking clarification from Judge Beeler re discovery dispute resolution and motion practice.	Discovery (Non-Deposition)
12/27/2023	Mark Johnson	0.4	\$1,150	\$460	follow-up call w G Wallace re seeking clarification on discovery order and outstanding discovery disputes.	Discovery (Non-Deposition)
12/27/2023	Mark Johnson	0.2	\$1,150	\$230	email exchanges w/ J Yellin re plan for seeking clarification on discovery order and discovery disputes.	Discovery (Non-Deposition)
12/27/2023	Mark Johnson	0.1	\$1,150	\$115	review and respond to E Rutner email re clarification of Judge Beeler's order re discovery disputes	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/27/2023	Mark Johnson	0.8	\$1,150	\$920	review and analyze Ds reply briefs iso mtn for sanctions and mtn to strike portions of attorney declaration iso mtn for leave.	Other Motions
12/27/2023	Rachel Steyer	1.2	\$750	\$900	reviewing draft plaintiffs' ROGS circulated by JSY	Discovery (Non-Deposition)
12/27/2023	Rachel Steyer	0.4	\$750	\$300	reviewing defendants response to motion for sanctions and motion to strike	Other Motions
12/27/2023	Rachel Steyer	0.8	\$750	\$600	completing master class cert. motions exhibit list	Trial and Pretrial Preparation
12/27/2023	Travis Close	2.2	\$850	\$1,870	Review, analyze, and organize docs related to the 2020 CZU fires for Santa Cruz/Scotts Valley facility	Discovery (Non-Deposition)
12/27/2023	Travis Close	1.9	\$850	\$1,615	Review, analyze, and organize docs explaining the evacuations at Brookdale's Sonoma County facilities during the 2017 Tubbs fire	Discovery (Non-Deposition)
12/27/2023	Travis Close	0.8	\$850	\$680	Review and analyze emails related emergency evacuation and preparedness for Tracy facility	Discovery (Non-Deposition)
12/27/2023	Travis Close	0.7	\$850	\$595	Review and analyze emails related emergency evacuation and preparedness for San Ramon facility	Discovery (Non-Deposition)
12/27/2023	Travis Close	2.1	\$850	\$1,785	Continue drafting outline of opinions for Kaile's rule 26 expert report	Experts (Including Retention)
12/27/2023	Travis Close	0.4	\$850	\$340	Review and analyze def's reply iso motion to strike improper attorney declarations	Pleadings and Motions Re: Pleadings
12/27/2023	Travis Close	0.3	\$850	\$255	Review and analyze Def's reply iso motion for sanctions	Pleadings and Motions Re: Pleadings
12/28/2023	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ re depositions; ESI search terms and custodians; impact of discovery schedule	Discovery (Non-Deposition)
12/28/2023	Guy Wallace	0.9	\$1,350	\$1,215	preparation of revised list re documents and categories of documents to be supplemented; com's with MTJ; TCC; RLS re same	Discovery (Non-Deposition)
12/28/2023	Guy Wallace	0.5	\$1,350	\$675	review and analysis of joint request for clarification to MJ Beeler; revise and edit; com's with ER; JY; MTJ; LEC re same	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/28/2023	Rachel Steyer	0.2	\$750	\$150	reviewing letter from MTJ previously sent to OC re discovery ESI search terms	Discovery (Non-Deposition)
12/28/2023	Rachel Steyer	0.4	\$750	\$300	reviewing defendants' reply re motion to strike amended BSU declaration	Other Motions
12/28/2023	Travis Close	1.2	\$850	\$1,020	Analyze Brookdale's transportation policies & trainings for info on purported justifications for riding-in-wheelchair prohibitions	Case Organization, Planning and Strategy
12/28/2023	Travis Close	1.1	\$850	\$935	Review and analyze emails discussing insurance policy issues related to accessible transportation of residents	Case Organization, Planning and Strategy
12/28/2023	Travis Close	1.5	\$850	\$1,275	Draft summary for GBW on Brookdale's evidence/justifications for prohibiting riding on scooters in buses	Case Organization, Planning and Strategy
12/28/2023	Travis Close	1.2	\$850	\$1,020	Review, analyze, and collect exemplars of documents from categories to seek supplementation from Defs'	Case Organization, Planning and Strategy
12/28/2023	Travis Close	0.9	\$850	\$765	Review and analyze emails produced from Hemet and Brookhurst facilities for evidence of evacuations during class period	Case Organization, Planning and Strategy
12/28/2023	Travis Close	1.4	\$850	\$1,190	Analyze deposition testimony on subject of fleet safety policy for info on Defs justification for same	Class Certification
12/28/2023	Travis Close	0.4	\$850	\$340	Review and analyze Def's pleadings related to fleet safety policy (Opps. to class cert, motions to strike) for info on company justifications for prohibition on riding scooters on bus	Pleadings and Motions Re: Pleadings
12/29/2023	Guy Wallace	1.3	\$1,350	\$1,755	prepare for and participate in team zoom with GG; JY; BU; MTJ; JAU; TCC re discovery cut offs, discovery tasks, motion practice	Discovery (Non-Deposition)
12/29/2023	Guy Wallace	1.8	\$1,350	\$2,430	review and analysis of documents and categories of documents for which Plaintiffs need supplementation from Defendants; com's with MTJ; TCC; RLS re same	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/29/2023	Guy Wallace	0.8	\$1,350	\$1,080	analysis of expert reports; com's with BU; MTJ; JAU; TCC re same	Experts (Including Retention)
12/29/2023	Guy Wallace	0.3	\$1,350	\$405	com's with PK; LP; RLS re preparation of Rule 26 expert report	Experts (Including Retention)
12/29/2023	Jennifer Bybee	0.6	\$925	\$555	Review Brookdale's Reply to Motion to Strike Improper Attorney Declarations	Other Motions
12/29/2023	Jennifer Bybee	0.1	\$925	\$93	Review Defendant's Reply to MTS Umpierre Decl.	Other Motions
12/29/2023	Mark Johnson	1.0	\$1,150	\$1,150	zoom call w/ Wallace, Yelin, Bybee, Umpierre, Close, others re status of discovery disputes, expert reports, proposed mtn to extend time for discovery cut-off, necessary depositions, document production, meet and confer w/ OC	Case Organization, Planning and Strategy
12/29/2023	Mark Johnson	2.0	\$1,150	\$2,300	Team mtg to review and discuss examples of categories of documents requiring supplementation.	Discovery (Non-Deposition)
12/29/2023	Mark Johnson	2.7	\$1,150	\$3,105	review and revise search terms and custodians from prior document ESI production; review docs in Relativity and conduct searches to inform revisions.	Discovery (Non-Deposition)
12/29/2023	Mark Johnson	0.5	\$1,150	\$575	review and analyze Order from Judge Beeler re discovery letters, procedure going forward; review and revise list of topics for meet and confer on Tuesday with opposing counsel.	Other Motions
12/29/2023	Rachel Steyer	3.2	\$750	\$2,400	ongoing review and preparing named plaintiffs resident file analysis	Discovery (Non-Deposition)
12/29/2023	Rachel Steyer	0.2	\$750	\$150	Call with GBW to review work re rule 26 expert reports and review of categories of documents	Discovery (Non-Deposition)
12/29/2023	Travis Close	1.8	\$850	\$1,530	Legal research re: scope of opinions necessary for disclosure under Rule 26	Case Organization, Planning and Strategy
12/29/2023	Travis Close	1.1	\$850	\$935	Meeting with team & co-counsel re: pre-trial prep, upcoming motions to compel, for extra depositions, & to move the date for expert reports	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/29/2023	Travis Close	0.4	\$850	\$340	Review and analyze depo testimony of Marie Harris for info on evacuations due to CZU fire	Case Organization, Planning and Strategy
12/29/2023	Travis Close	1.4	\$850	\$1,190	Meeting with MTJ, GBW reviewing list of docs for supplementation	Case Organization, Planning and Strategy
12/30/2023	Guy Wallace	1.1	\$1,350	\$1,485	legal research and analysis re transportation claim re Fleet Safety Policy; Defendants' justifications for same; com's with MTJ; JAU re same	Discovery (Non-Deposition)
12/30/2023	Guy Wallace	1.1	\$1,350	\$1,485	revise and edit draft supplemental interrogatory responses re Algarne	Discovery (Non-Deposition)
12/30/2023	Guy Wallace	0.9	\$1,350	\$1,215	preparation of revised summary of documents and categories of documents that should be supplemented by Defendants and relevance of same to claims and defenses	Discovery (Non-Deposition)
12/30/2023	Guy Wallace	1.7	\$1,350	\$2,295	legal research and analysis re Algarne and standing for injunctive relief re barrier removal; Supreme Court and Ninth Circuit cases	Misc. Research
12/30/2023	Guy Wallace	0.9	\$1,350	\$1,215	legal research and analysis re 49 C.F.R. section 37.165(e) and individual decision to transfer from wheelchair	Misc. Research
12/30/2023	Guy Wallace	0.7	\$1,350	\$945	review and analysis of Order from MJ Beeler re request for clarification	Other Motions
12/31/2023	Guy Wallace	2.8	\$1,350	\$3,780	analysis and identification of documents and categories of documents that Defendants must supplement and relevance of same to the parties claims and defenses	Discovery (Non-Deposition)
12/31/2023	Guy Wallace	0.8	\$1,350	\$1,080	com's with GG; JY; MTJ re Order from MJ Beeler and response re same; motion re discovery cut offs; meet and confer issues with Defendants re discovery; analysis of same	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/31/2023	Guy Wallace	0.5	\$1,350	\$675	review and analysis of Order from MJ Beeler of 12/30/23; issues raised in Plaintiffs' submission, ECF No. 688	Discovery (Non-Deposition)
12/31/2023	Guy Wallace	0.3	\$1,350	\$405	review and analysis of email from MTJ re ESI search terms and custodians; potential additional custodians	Discovery (Non-Deposition)
1/1/2024	Guy Wallace	0.9	\$1,350	\$1,215	com's with GG; MTJ re MJ Beeler Order of 12/30/23; motion re discovery cut offs; motions to compel	Discovery (Non-Deposition)
1/1/2024	Guy Wallace	1.5	\$1,350	\$2,025	preparation of outline of points re admin motion re discovery cut offs; com's with MTJ re same	Other Motions
1/1/2024	Guy Wallace	2.3	\$1,350	\$3,105	preparation and drafting of outline of motion to extend the discovery cut offs; com's with MTJ re same	Other Motions
1/1/2024	Mark Johnson	0.5	\$1,150	\$575	call from G Wallace re Judge Beeler's order, refiling letter briefs as motions, mtn to extend discovery deadline; key discovery disputes to raise	Discovery (Non-Deposition)
1/1/2024	Mark Johnson	0.5	\$1,150	\$575	conference call w/ G Wallace and G Grunfeld re Judge Beeler's Order and strategy for seeking extension of discovery cut-offs, filing motions, letter briefs v motions; meeting and conferring with Defendants.	Discovery (Non-Deposition)
1/1/2024	Mark Johnson	0.2	\$1,150	\$230	follow-up call w/ G Wallace re mtns to compel, timing, mtn for extension of discovery deadlines.	Discovery (Non-Deposition)
1/1/2024	Mark Johnson	0.3	\$1,150	\$345	locate and review prior motions for leave to exceed 25 deposition limit and share w/ Co Counsel	Other Motions
1/2/2024	Guy Wallace	1.5	\$1,350	\$2,025	meet and confer with ER; JB; Jacobsen; BBK; MTJ; TCC re discovery issues and potential stipulation re discovery cut offs	Communications With Opposing Counsel
1/2/2024	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ re preparation for meet and confer with Defendants re discovery and discovery cut off issues	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/2/2024	Guy Wallace	1.5	\$1,350	\$2,025	review and analysis of Defendants' letter brief re the Fleet Safety Policy (FSP); review and analysis of FSP; com's with BBK; MTJ; TCC re same	Discovery (Non-Deposition)
1/2/2024	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re results of meet and confer with Defendants and next steps re same	Discovery (Non-Deposition)
1/2/2024	Guy Wallace	2.1	\$1,350	\$2,835	preparation and drafting of detailed outline of motion re discovery cut offs	Other Motions
1/2/2024	Guy Wallace	1.9	\$1,350	\$2,565	preparation and drafting of motion re discovery cut offs	Other Motions
1/2/2024	Mark Johnson	1.5	\$1,150	\$1,725	telephonic meet and confer with Opposing counsel Rutner, Bertino, Jacobson and COC Wallace, Bien-Kahn, Close re multiple discovery issues, schedule, motions	Communications With Opposing Counsel
1/2/2024	Mark Johnson	0.7	\$1,150	\$805	call w/ G Wallace re issues to be addressed on meet and confer call re discovery; arguments re doc production and depos concerning fleet safety policy.	Discovery (Non-Deposition)
1/2/2024	Mark Johnson	0.9	\$1,150	\$1,035	post meet and confer call with G Wallace re next steps, Fleet Safety Policy, further inspections of facilities, mtn to compel benchmark formulas	Discovery (Non-Deposition)
1/2/2024	Mark Johnson	0.5	\$1,150	\$575	review and analyze notes from T Close and B Bien Kahn re meet and confer session; email co-counsel re same and proposed call.	Discovery (Non-Deposition)
1/2/2024	Mark Johnson	0.7	\$1,150	\$805	review previously served rogs and email to G Wallace re rogs concerning Fleet Safety Policy.	Discovery (Non-Deposition)
1/2/2024	Mark Johnson	0.2	\$1,150	\$230	call w/ J Thornton re time needed to prepare staffing analysis of 6 facilities; discovery and expert disclosure deadlines; preparation of Weekly labor analysis and Jones expert testimony.	Experts (Including Retention)
1/2/2024	Mark Johnson	0.1	\$1,150	\$115	call w/ GBW re staffing data, timing issues, expert disclosure cutoff	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/2/2024	Mark Johnson	0.2	\$1,150	\$230	follow-up call w/ G Wallace re staffing data analysis; expert disclosures; jones expert report and weekly reports re staffing	Trial and Pretrial Preparation
1/2/2024	Travis Close	1.7	\$850	\$1,445	Review, analyze, and organize files related to JJ Keller & Associates' contractual relationship with Brookdale regarding resident transportation & vehicle fleet	Case Organization, Planning and Strategy
1/2/2024	Travis Close	1.3	\$850	\$1,105	Draft attachment to subpoena to JJ Keller listing relevant documents to request	Case Organization, Planning and Strategy
1/2/2024	Travis Close	1.4	\$850	\$1,190	Analysis of search terms used to gather ESI re: fleet safety policy enforcement through 2020	Case Organization, Planning and Strategy
1/2/2024	Travis Close	0.3	\$850	\$255	Email to BBK re: search terms and ESI for fleet safety policy enforcement	Case Organization, Planning and Strategy
1/2/2024	Travis Close	0.2	\$850	\$170	Email to GBW, MTJ re: 2019 and 2020 versions of fleet safety policy	Case Organization, Planning and Strategy
1/2/2024	Travis Close	0.7	\$850	\$595	Research agent for service of process to JJ Keller & Associates	Case Organization, Planning and Strategy
1/2/2024	Travis Close	0.2	\$850	\$170	Email to team re: notes from today's m/c with defendants	Case Organization, Planning and Strategy
1/2/2024	Travis Close	1.5	\$850	\$1,275	Meet and confer with Defendants re: outstanding discovery issues	Discovery (Non-Deposition)
1/2/2024	Travis Close	0.4	\$850	\$340	Email to MTJ, GBW re: draft list of items for JJ Keller subpoena	Pleadings and Motions Re: Pleadings
1/3/2024	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ; TCC re written discovery propounded by Plaintiffs, assessment of need re further written discovery	Discovery (Non-Deposition)
1/3/2024	Guy Wallace	0.3	\$1,350	\$405	com's with JAU re MTC re discovery re Defendants' Fleet Safety Policy; draft admin motion re discovery cut offs	Discovery (Non-Deposition)
1/3/2024	Guy Wallace	3.9	\$1,350	\$5,265	preparation and drafting of admin motion re discovery cut offs	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/3/2024	Guy Wallace	0.5	\$1,350	\$675	review and analysis of Defendants' portion of MTC re site inspections; com's with MTJ re response to same	Other Motions
1/3/2024	Guy Wallace	0.5	\$1,350	\$675	com's with GG; MTJ re proposed stipulation re case schedule	Other Motions
1/3/2024	Guy Wallace	0.9	\$1,350	\$1,215	revise and edit draft administrative motion re cut offs; incorporate edits from JAU; com's with MTJ re same	Other Motions
1/3/2024	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of MTC re site inspections of San Ramon and Scotts Valley facilities; revise and edit same; com's with MTJ re same	Other Motions
1/3/2024	Jennifer Bybee	0.7	\$925	\$648	Review com's with co-counsel and letter briefs re discovery issues	Discovery (Non-Deposition)
1/3/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re research re discovery behind FSP	Discovery (Non-Deposition)
1/3/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re editing letter brief	Discovery (Non-Deposition)
1/3/2024	Jennifer Bybee	1.6	\$925	\$1,480	Research re reasons behind policy are discoverable	Misc. Research
1/3/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re research and reviewing document re discovery	Misc. Research
1/3/2024	Jennifer Bybee	1.4	\$925	\$1,295	Review and edit request to extend discovery cut off	Other Motions
1/3/2024	Travis Close	0.3	\$850	\$255	Email to GBW re: updating discovery tracking spreadsheet	Discovery (Non-Deposition)
1/3/2024	Travis Close	2.3	\$850	\$1,955	Analyze def's responses to RFP, Set Nine and update in discovery tracking spreadsheet	Discovery (Non-Deposition)
1/3/2024	Travis Close	2.6	\$850	\$2,210	Analyze def's responses to RFP, Set Ten and update in discovery tracking spreadsheet	Discovery (Non-Deposition)
1/3/2024	Travis Close	0.4	\$850	\$340	Review and analyze filed version of Administrative motion to seal, Decl. of michael jacobson, and associated exhibits	Discovery (Non-Deposition)
1/3/2024	Travis Close	0.5	\$850	\$425	Review and analyze court's order & opinions with respect to the transportation class certified to compare to Def's responses in recent RFPS	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/4/2024	Guy Wallace	1.5	\$1,350	\$2,025	com's with GG; JY; MTJ; JAU re proposed extension of discovery cut offs and com's from Defendants re same	Case Organization, Planning and Strategy
1/4/2024	Guy Wallace	0.5	\$1,350	\$675	review and analysis of Defendants' recently produced transportation policy documents; com's with MTJ re same	Discovery (Non-Deposition)
1/4/2024	Guy Wallace	0.4	\$1,350	\$540	com's with Marks re staffing analysis re six facilities	Experts (Including Retention)
1/4/2024	Guy Wallace	0.3	\$1,350	\$405	com's with JAU re legal research re challenges to written policies and scope of same	Other Motions
1/4/2024	Jennifer Bybee	0.1	\$925	\$93	Review emails with GBW and MTJ re admin motion to extend discovery deadline	Discovery (Non-Deposition)
1/4/2024	Jennifer Bybee	0.1	\$925	\$93	Email to GBW re discovery research re FSP	Discovery (Non-Deposition)
1/4/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re discovery research	Discovery (Non-Deposition)
1/4/2024	Jennifer Bybee	3.0	\$925	\$2,775	Research re discovery about FSP	Misc. Research
1/4/2024	Mark Johnson	1.8	\$1,150	\$2,070	search for and review all copies of Transportation Resource Guide and custodians of same; draft email re results of findings, custodians	Discovery (Non-Deposition)
1/4/2024	Mark Johnson	4.5	\$1,150	\$5,175	work on draft declaration iso admin mtn for extending discovery deadlines, com w/ G Wallace re same	Other Motions
1/4/2024	Travis Close	0.5	\$850	\$425	Analysis of status of discovery requests re: staffing algorithms and related queries/data	Case Organization, Planning and Strategy
1/4/2024	Travis Close	0.4	\$850	\$340	Email to Doug Cross scheduling time for call to discuss rule 26 reports and trial	Case Organization, Planning and Strategy
1/4/2024	Travis Close	0.9	\$850	\$765	Calculate total number of ROGs and RFPs served by plaintiffs, categorized by plaintiff and total	Discovery (Non-Deposition)
1/4/2024	Travis Close	0.4	\$850	\$340	Analysis of status of discovery requests re: list and contacted info of members of certified transportation class	Discovery (Non-Deposition)
1/4/2024	Travis Close	0.6	\$850	\$510	Review, analyze, and propose revisions for revised draft joint letter brief re: inspections	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/4/2024	Travis Close	0.5	\$850	\$425	Analysis of status of discovery requests re: facility alterations and building modifications	Discovery (Non-Deposition)
1/4/2024	Travis Close	0.7	\$850	\$595	Analysis of status of discovery requests re: facility capital expenditure plans	Discovery (Non-Deposition)
1/4/2024	Travis Close	0.3	\$850	\$255	Email to Mr. Cross re: next steps and scheduling time for call	Experts (Including Retention)
1/5/2024	Guy Wallace	0.5	\$1,350	\$675	review and analysis of Rutner email re discovery cut offs and Defendants' proposal re same; com's with MTJ re same	Discovery (Non-Deposition)
1/5/2024	Guy Wallace	0.6	\$1,350	\$810	prepare for and participate in zoom with ER; JB; MJ; GG; MTJ re proposed stipulation re case schedule and discovery cut offs	Discovery (Non-Deposition)
1/5/2024	Guy Wallace	0.5	\$1,350	\$675	com's with BU re Defendants' proposals re case schedule and discovery cut offs	Discovery (Non-Deposition)
1/5/2024	Guy Wallace	0.8	\$1,350	\$1,080	further com's with ER re issue of follow-up discovery and potential stipulation re discovery and case schedule	Discovery (Non-Deposition)
1/5/2024	Guy Wallace	0.7	\$1,350	\$945	review and analysis of cert petition in Langer v. Kiser; implications re standing and disability access	Misc. Research
1/5/2024	Guy Wallace	0.4	\$1,350	\$540	review and analysis of draft MTJ declaration re motion to extend discovery cut offs	Other Motions
1/5/2024	Guy Wallace	0.5	\$1,350	\$675	review and analysis of Defendants' portion of letter re site inspections; com's with MTJ re same	Other Motions
1/5/2024	Guy Wallace	0.6	\$1,350	\$810	com's with GG re Defendants' proposals re case schedule and discovery cut offs	Other Motions
1/5/2024	Guy Wallace	0.8	\$1,350	\$1,080	com's with MTJ re Defendants' proposals re case schedule and discovery cut offs	Other Motions
1/5/2024	Guy Wallace	0.4	\$1,350	\$540	review and analysis of draft motion re class list; com's with BBK re same	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/5/2024	Guy Wallace	0.4	\$1,350	\$540	com's with GG; BBK re form of request for change to case schedule and discovery cut offs	Other Motions
1/5/2024	Jennifer Bybee	2.8	\$925	\$2,590	Research re entitled to discovery re FSP	Discovery (Non-Deposition)
1/5/2024	Mark Johnson	0.4	\$1,150	\$460	call w G Wallace re OC proposed language for stip extending time for discovery cut off	Case / Document Administration
1/5/2024	Mark Johnson	0.2	\$1,150	\$230	review and analyze email proposal from OC Rutner re stip to extend deadlines, email G Wallace re same	Other Motions
1/5/2024	Mark Johnson	0.5	\$1,150	\$575	conference call w/ OC Rutner, Jacobsen, and w/ Wallace, Grunfeld, Yelln re parties' competing positions on language for proposed stip to extend discovery deadlines	Pleadings and Motions Re: Pleadings
1/5/2024	Mark Johnson	0.3	\$1,150	\$345	follow up call w Wallace and Grunfeld re position to take on language for proposed stip to extend discovery deadline	Pleadings and Motions Re: Pleadings
1/5/2024	Mark Johnson	1.7	\$1,150	\$1,955	multiple calls (x8) w/ G Wallace re back-and-and forth proposals on stip for extension of discovery deadlines, explanations re same and discussions of how they would play out in various scenarios; risks of filing motion instead of stip	Pleadings and Motions Re: Pleadings
1/5/2024	Mark Johnson	0.3	\$1,150	\$345	review and draft alternative language for stip extending discovery deadlines	Pleadings and Motions Re: Pleadings
1/5/2024	Travis Close	0.3	\$850	\$255	Draft email to team re: notice of inspection for purposes of emergency evacuation	Case Organization, Planning and Strategy
1/5/2024	Travis Close	0.8	\$850	\$680	Review and analyze recently produced logs re: emergency evacuation work for Tracy facility	Case Organization, Planning and Strategy
1/5/2024	Travis Close	1.2	\$850	\$1,020	Review prior communications between parties re: search terms and analyze status of dispute for joint letter brief	Case Organization, Planning and Strategy
1/5/2024	Travis Close	0.8	\$850	\$680	Review and analyze emails discussing emergency evacuation & planning at Brookhurst facility	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/5/2024	Travis Close	1.3	\$850	\$1,105	Review, analyze, and organize community resident evacuation ability forms produced for the six plaintiff facilities	Discovery (Non-Deposition)
1/5/2024	Travis Close	1.3	\$850	\$1,105	Review and analyze documents produced today (BKD3030430 - BKD3030486) for completeness with RFPs, Set 9 and 10	Discovery (Non-Deposition)
1/5/2024	Travis Close	1.7	\$850	\$1,445	Review and analyze emails discussing emergency evacuation & planning at the Tracy facility	Experts (Including Retention)
1/5/2024	Travis Close	0.4	\$850	\$340	meeting with GBW and co-counsel re: stipulation to extend discovery, inspections, etc	Trial and Pretrial Preparation
1/6/2024	Guy Wallace	2.4	\$1,350	\$3,240	revise and edit draft stipulation and proposed order re schedule; declaration of GBW re same; com's with team re same	Other Motions
1/6/2024	Guy Wallace	1.3	\$1,350	\$1,755	revise and edit draft proposed stipulation and supporting declaration of GBW; com's with MTJ re same	Other Motions
1/6/2024	Guy Wallace	1.1	\$1,350	\$1,485	revise and edit draft motion to compel class list re transportation class	Other Motions
1/6/2024	Jennifer Bybee	0.9	\$925	\$833	Draft email re research re entitlement to discovery about FSP	Discovery (Non-Deposition)
1/6/2024	Mark Johnson	0.3	\$1,150	\$345	review revised draft stip and supporting declaration extending time for discovery cut-off; send email w/ comments re same to G Wallace	Other Motions
1/6/2024	Mark Johnson	0.4	\$1,150	\$460	call w/ G Wallace re edits to proposed stip to extend discovery cut-off and declaration iso stipulation	Other Motions
1/7/2024	Guy Wallace	1.1	\$1,350	\$1,485	revise and edit draft motion to compel re transportation class list; review and analysis of legal research from JAU re consideration of lawfulness of policies without consideration of their application to the class members; com's with BBK re same	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/7/2024	Jennifer Bybee	0.6	\$925	\$555	Draft email re research re entitlement to discovery about FSP	Discovery (Non-Deposition)
1/8/2024	Guy Wallace	0.5	\$1,350	\$675	review and analysis of motions to compel filed by Plaintiffs; com's with MTJ re same and further MTC's to be filed	Discovery (Non-Deposition)
1/8/2024	Guy Wallace	0.4	\$1,350	\$540	com's with PK; LP; RLS re preparation of Rule 26 report	Experts (Including Retention)
1/8/2024	Guy Wallace	0.5	\$1,350	\$675	legal research and analysis re Ninth Circuit standards re standing for injunctive relief in access cases, and use of facts in complaint re same	Misc. Research
1/8/2024	Guy Wallace	2.3	\$1,350	\$3,105	revise and edit draft stipulation and proposed order re case schedule; supporting declaration of GBW re same; com's with ER; JY; MTJ re same	Other Motions
1/8/2024	Guy Wallace	0.5	\$1,350	\$675	review and analysis of draft MTC re transportation class list; com's with BBK re same	Other Motions
1/8/2024	Mark Johnson	0.3	\$1,150	\$345	review doc production emails to confirm production of LDR and Kronos data and verify transmission to experts; review production in Relativity for same; coms w/ R Steyer and R. Bonner re same.	Discovery (Non-Deposition)
1/8/2024	Mark Johnson	1.7	\$1,150	\$1,955	review Ds responses to 8 sets of interrogatories and 11th set of document requests and draft memo/email for file/COC summarizing same and rogs	Discovery (Non-Deposition)
1/8/2024	Mark Johnson	1.0	\$1,150	\$1,150	review and make final revisions, corrections to draft letter brief re site inspections	Other Motions
1/8/2024	Mark Johnson	0.7	\$1,150	\$805	coms w/ L Castro re exhibits to draft ltr re site inspections; review exhibits; email exchanges w OC Rutner re letter and exhibits.	Other Motions
1/8/2024	Mark Johnson	0.4	\$1,150	\$460	call w/ G Wallace reviewing and conferring re D proposed edits to stipulation to extend discovery deadlines	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/8/2024	Mark Johnson	0.2	\$1,150	\$230	review and analyze email from OC re issues with draft declaration iso stipulation to extend discovery deadlines, call w GBW re same.	Other Motions
1/8/2024	Mark Johnson	3.8	\$1,150	\$4,370	work on mtn to compel Benchmark formula	Other Motions
1/8/2024	Rachel Steyer	0.3	\$750	\$225	follow up call with Wendy DeMello to provide case status update	Class Outreach and Contact
1/8/2024	Rachel Steyer	0.3	\$750	\$225	reviewing email thread between GBW and OC concerning proposed stipulation and points to modification of discovery and case schedule	Communications With Opposing Counsel
1/8/2024	Rachel Steyer	0.2	\$750	\$150	reviewing TCC notes of meet and confer with defendants	Discovery (Non-Deposition)
1/8/2024	Rachel Steyer	0.2	\$750	\$150	reviewing defendants portion of joint discovery letter brief re additional site inspections	Discovery (Non-Deposition)
1/8/2024	Rachel Steyer	0.5	\$750	\$375	reviewing BBK drafts of motion to compel class list/info, draft order	Discovery (Non-Deposition)
1/8/2024	Rachel Steyer	0.2	\$750	\$150	reviewing draft joint stipulation re modified case schedule	Discovery (Non-Deposition)
1/8/2024	Rachel Steyer	1.1	\$750	\$825	reviewing defendants' interrogatory responses	Discovery (Non-Deposition)
1/8/2024	Rachel Steyer	0.3	\$750	\$225	call with GBW, and Patrick Kennedy and staff to discuss preliminary review and preparation for Rule 26 expert report and materials needed	Experts (Including Retention)
1/8/2024	Rachel Steyer	1.2	\$750	\$900	gathering and preparing documents for Dr. Kennedy Rule 26 report	Experts (Including Retention)
1/8/2024	Rachel Steyer	0.6	\$750	\$450	reviewing draft motion, declaration, and proposed order for sealing motion	Other Motions
1/8/2024	Rachel Steyer	0.2	\$750	\$150	reviewing BBK revised and updated draft MTC productino of class list	Other Motions
1/8/2024	Travis Close	0.8	\$850	\$680	Review and analyze latest edits to draft stipulation and extension of fact discovery; compare to current scheduling order and verify compliance with local rules	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/8/2024	Travis Close	2.6	\$850	\$2,210	Continue drafting outline of Kailes' rule 26 report using evidence from Brookdale-produced documents	Case Organization, Planning and Strategy
1/8/2024	Travis Close	1.4	\$850	\$1,190	Research background, important dates, locations affected related to CZU Fire in 2020	Case Organization, Planning and Strategy
1/8/2024	Travis Close	0.5	\$850	\$425	Review and analyze Brookdale's internal audits of its emergency evacuations for CZU fire	Case Organization, Planning and Strategy
1/8/2024	Travis Close	2.3	\$850	\$1,955	Review, analyze, & organize testimony from plaintiffs and resident declarants at pltf's facilities re: emergency evacuation concerns	Experts (Including Retention)
1/8/2024	Travis Close	0.6	\$850	\$510	Review, analyze, and provide additions to draft motion to compel list of members of certified class	Pleadings and Motions Re: Pleadings
1/9/2024	Guy Wallace	0.3	\$1,350	\$405	com's with DTM; JT; BU; MTJ re further staffing analyses re six facilities used by the named Plaintiffs	Discovery (Non-Deposition)
1/9/2024	Guy Wallace	1.3	\$1,350	\$1,755	zoom with MTJ; JAU; TCC; RLS re remaining discovery; potential motions to compel; preparation of expert reports	Discovery (Non-Deposition)
1/9/2024	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ; RAB re analysis of Defendants' recent productions since November 20, 2023; coding of overall production; documents re California staffing regulation; FSP; wheelchair restraints	Discovery (Non-Deposition)
1/9/2024	Guy Wallace	0.4	\$1,350	\$540	review and analysis of Cross declarations re class certification	Experts (Including Retention)
1/9/2024	Guy Wallace	0.6	\$1,350	\$810	review and analysis of potential further motions to compel; com's with MTJ re same	Other Motions
1/9/2024	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of FSP; documents that should be produced and/or updated re FSP and transportation services	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/9/2024	Guy Wallace	0.7	\$1,350	\$945	review and analysis of draft MTC re transportation documents (ESI); com's with BBK; MTJ re inclusion of issues re additional categories of transportation documents that have not been produced	Other Motions
1/9/2024	Guy Wallace	0.4	\$1,350	\$540	com's with TCC re preparation for trial and analysis of remaining areas of discovery and preparation re transportation and emergency evacuation	Trial and Pretrial Preparation
1/9/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re Rule 26 disclosures	Discovery (Non-Deposition)
1/9/2024	Mark Johnson	1.2	\$1,150	\$1,380	draft memo for team re motions to compel and potential motions to compel; document analysis, info/demands we need to provide to defendants	Case Organization, Planning and Strategy
1/9/2024	Mark Johnson	1.5	\$1,150	\$1,725	team call w/ Wallace, Close, Bybee, Steyer re motions to compel, analysis of documents produced and documents for which follow up and supplementation is necessary, focus on transportation / fleet safety documents	Discovery (Non-Deposition)
1/9/2024	Mark Johnson	0.5	\$1,150	\$575	video conference w/ G Wallace, R Bonner re searches to be conducted, coding, explanations for gaps in production on Relativity, assignment of document reviewer	Discovery (Non-Deposition)
1/9/2024	Mark Johnson	3.0	\$1,150	\$3,450	review all document requests and responses to identify requests for which no production was offered or only after meet and confer and for which no docs may have been produced; prepare consolidated spreadsheet identifying same.	Discovery (Non-Deposition)
1/9/2024	Mark Johnson	1.5	\$1,150	\$1,725	draft email to SW team and Bien-Kahn identifying all document requests seeking docs related to transportation and fleet safety policy.	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/9/2024	Mark Johnson	0.2	\$1,150	\$230	review order from court granting stip re extension of discovery deadlines and trial date; confer w/ G Wallace re same and re decision to abide by provisions of stip not included in order.	Other Motions
1/9/2024	Mark Johnson	0.4	\$1,150	\$460	review revised draft of ltr brief from B Bien-Kahn re Fleet Safety docs; call w/ G Wallace re pros and cons of letter brief vs. broader noticed motion seeking all categories of transportation and fleet safety documents.	Other Motions
1/9/2024	Mark Johnson	0.7	\$1,150	\$805	begin legal research on contention interrogatories for mtn to compel responses to Ps rogs.	Other Motions
1/9/2024	Rachel Steyer	1.5	\$750	\$1,125	meeting with GBW, MTJ, TCC, JUB to review and discuss outstanding discovery tasks and assignments	Discovery (Non-Deposition)
1/9/2024	Rachel Steyer	1.1	\$750	\$825	reviewing latest productions and memoranda, preparing more detailed discovery tracking spreadsheet	Discovery (Non-Deposition)
1/9/2024	Rachel Steyer	0.2	\$750	\$150	reviewing revised portion of plaintiffs' joint letter brief re ESI for fleet safety policy as circulated by BBK	Discovery (Non-Deposition)
1/9/2024	Rachel Steyer	3.9	\$750	\$2,925	reviewing latest productions and updating detailed tracking spreadsheet	Discovery (Non-Deposition)
1/9/2024	Rachel Steyer	0.4	\$750	\$300	preparing, looking for, and gathering documents for Dr. Kennedy	Experts (Including Retention)
1/9/2024	Travis Close	1.6	\$850	\$1,360	Meeting with MTJ, GBW, RLS, JUB re: follow-up discovery (motions to compel and requests to supplement)	Case Organization, Planning and Strategy
1/9/2024	Travis Close	0.7	\$850	\$595	Call with GBW re: follow-up on discovery related to transportation policies and enforcement	Case Organization, Planning and Strategy
1/9/2024	Travis Close	2.4	\$850	\$2,040	Draft compendium of evidence for June Kailes' rule 26 expert reports	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/9/2024	Travis Close	1.6	\$850	\$1,360	Analysis of discovery requests bearing on transportation issues/services	Case Organization, Planning and Strategy
1/9/2024	Travis Close	0.8	\$850	\$680	Review and analyze responses to Pltf's RFPs and ROGs served yesterday evening	Discovery (Non-Deposition)
1/9/2024	Travis Close	1.0	\$850	\$850	Research scope, timing, and extent of Kincade Fire (2019) affecting Paulin Creek facility	Experts (Including Retention)
1/10/2024	Guy Wallace	3.3	\$1,350	\$4,455	review and analysis of spreadsheet from MTJ re status of Defendants' production of documents and non-produced categories	Discovery (Non-Deposition)
1/10/2024	Guy Wallace	0.8	\$1,350	\$1,080	com's with MTJ; RLS; RAB re deficiencies in Defendants' production of documents and analysis of same; potential motions to compel	Discovery (Non-Deposition)
1/10/2024	Guy Wallace	0.4	\$1,350	\$540	com's with DREDF re Defendants' Fleet Safety Policy and issues re safety	Misc. Research
1/10/2024	Guy Wallace	0.5	\$1,350	\$675	com's with BBK; MTJ; TCC re preparation of motion to compel re transportation documents	Other Motions
1/10/2024	Mark Johnson	0.3	\$1,150	\$345	review and analyze metadata output from last 4 post 11/20 production from defendants; email to G Wallace re same; research identity of custodian	Discovery (Non-Deposition)
1/10/2024	Mark Johnson	0.5	\$1,150	\$575	call w G Wallace re strategy for seeking to compel document production re transportation and fleet safety policy issues, assessment of documents that have been produced to date, review of metadata of documents recently produced.	Discovery (Non-Deposition)
1/10/2024	Mark Johnson	0.3	\$1,150	\$345	call w/ G Wallace re identification of transportation documents to meet and confer about with OC before MTC, review of document requests for same and for identifying categories for which supplementation should be demanded, prioritizing ESI production, supplementation and transportation depo.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/10/2024	Mark Johnson	0.4	\$1,150	\$460	draft emails to Thornton, Mastin, Waters re status and extension of expert deadlines	Experts (Including Retention)
1/10/2024	Rachel Steyer	0.2	\$750	\$150	call with GBW to review discovery tasks and assignments	Discovery (Non-Deposition)
1/10/2024	Travis Close	0.4	\$850	\$340	Call with GBW re: transportation policy assignment	Case Organization, Planning and Strategy
1/10/2024	Travis Close	1.8	\$850	\$1,530	Analysis of discovery propounded on defendants related to transportation of residents	Case Organization, Planning and Strategy
1/10/2024	Travis Close	1.9	\$850	\$1,615	Analyze status of completed discovery for transportation-related categories of docs created by GBW (#s 1-6)	Discovery (Non-Deposition)
1/10/2024	Travis Close	1.6	\$850	\$1,360	Review and analyze incidents related to resident injuries while using Brookdale's transportation	Discovery (Non-Deposition)
1/10/2024	Travis Close	1.8	\$850	\$1,530	Updates to compendium of evidence for June Kailes; email and share with team	Experts (Including Retention)
1/11/2024	Guy Wallace	1.9	\$1,350	\$2,565	review and analysis of Plaintiffs' RFPs, sets numbers 1-8; com's with MTJ re particular RFP's requiring supplementation by Defendants and potential motions to compel	Discovery (Non-Deposition)
1/11/2024	Mark Johnson	0.3	\$1,150	\$345	call w/ G Wallace re other outstanding discovery issues, motions to compel	Case Organization, Planning and Strategy
1/11/2024	Mark Johnson	0.5	\$1,150	\$575	review doc request and discuss w/ G Wallace to identify requests to include in demand for supplementation.	Discovery (Non-Deposition)
1/11/2024	Mark Johnson	1.1	\$1,150	\$1,265	continue review of doc requests w/ G Wallace by phone to identify request to include in demand for supplementation.	Discovery (Non-Deposition)
1/11/2024	Mark Johnson	0.2	\$1,150	\$230	email exchanges w/ OC Rutner and Bertino re impasse on interrogatories, status of supplementing staffing data production.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/11/2024	Mark Johnson	1.5	\$1,150	\$1,725	draft ltr re demand for supplementation incorporating list of specific rfps to be supplemented	Discovery (Non-Deposition)
1/11/2024	Mark Johnson	0.5	\$1,150	\$575	review email from J Bertino re new document production content; review and analyze metadata output of same, coms w R Bonner and G Wallace re same	Discovery (Non-Deposition)
1/11/2024	Mark Johnson	0.1	\$1,150	\$115	email to OC re status of production of ESI search terms and custodians used and updated information re mgmt personnel at SV and SR facilities.	Discovery (Non-Deposition)
1/11/2024	Mark Johnson	0.4	\$1,150	\$460	review spreadsheet from T Close re transportation related documents and production of same; review additional docs in folder re transportation and draft email to TC and GBW re same.	Discovery (Non-Deposition)
1/11/2024	Mark Johnson	1.7	\$1,150	\$1,955	legal research re production of proprietary data, source code for mtc re benchmark formula	Other Motions
1/11/2024	Mark Johnson	0.2	\$1,150	\$230	review and analyze draft letter brief to seek additional depositions.	Other Motions
1/11/2024	Mark Johnson	1.5	\$1,150	\$1,725	work on mtc benchmark formula.	Other Motions
1/11/2024	Travis Close	2.1	\$850	\$1,785	Analyze status of completed discovery for transportation-related categories of docs created by GBW (#s 7-12)	Case Organization, Planning and Strategy
1/11/2024	Travis Close	1.2	\$850	\$1,020	Review, analyze, and organize all versions of Brookdale's transportation policies related to resident safety and injuries/incident reporting	Case Organization, Planning and Strategy
1/11/2024	Travis Close	1.1	\$850	\$935	Analysis of copies of course material produced regarding transportation services	Case Organization, Planning and Strategy
1/11/2024	Travis Close	0.3	\$850	\$255	Email to GBW, MTJ re: analysis of transportation categories	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/11/2024	Travis Close	1.6	\$850	\$1,360	Review and analyze status of discovery requests marked for follow-up, meet/confer, and/or motions to compel	Discovery (Non-Deposition)
1/11/2024	Travis Close	0.4	\$850	\$340	Prep / notes before call with Doug Cross re: rule 26 reports and expert discovery needed, trial dates	Experts (Including Retention)
1/11/2024	Travis Close	1.6	\$850	\$1,360	Call with Doug Cross re: trial schedule, content of expert reports and rebuttal reports	Experts (Including Retention)
1/12/2024	Guy Wallace	0.6	\$1,350	\$810	review and analysis of draft letter from MTJ to Rutner re supplementation of document production	Communications With Opposing Counsel
1/12/2024	Guy Wallace	2.9	\$1,350	\$3,915	review and analysis of documents and categories of documents that need to be supplemented by Defendants; potential motion to compel production of documents re same; revise and edit draft letter from MTJ re same	Discovery (Non-Deposition)
1/12/2024	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of draft ESI search terms and proposed custodians from MTJ; revise and edit same; com's with MTJ re same	Discovery (Non-Deposition)
1/12/2024	Guy Wallace	1.4	\$1,350	\$1,890	revise and edit draft further list of documents and categories of documents that must be supplemented by Defendants; com's with MTJ re same	Discovery (Non-Deposition)
1/12/2024	Guy Wallace	1.1	\$1,350	\$1,485	team zoom with JY; BBK; AS; BU; MTJ; JAU; TCC; RLS re motions to compel; remaining discovery disputes with Defendants; motion for subclasses	Discovery (Non-Deposition)
1/12/2024	Guy Wallace	0.5	\$1,350	\$675	legal research and analysis re proportionality test and cases with small monetary amounts at issue, or only injunctive relief; issue re important of site inspections in ADA cases; com's with BBK re same	Misc. Research
1/12/2024	Guy Wallace	0.6	\$1,350	\$810	revise and edit draft MTC from BBK re additional depos	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/12/2024	Guy Wallace	0.4	\$1,350	\$540	revise and edit draft letter from MTJ to Defendants re ESI and custodians	Other Motions
1/12/2024	Jennifer Bybee	0.1	\$925	\$93	Review email communications with GBW, MTJ and co-counsel re discovery, motions to compel, and upcoming team call.	Discovery (Non-Deposition)
1/12/2024	Jennifer Bybee	0.9	\$925	\$833	Zoom call with co-counsel re discovery and motions to compel	Discovery (Non-Deposition)
1/12/2024	Mark Johnson	1.0	\$1,150	\$1,150	Zoom team mtg w Wallace, Yelin, Close, Steyer, Bybee, Edmundson, Umpierre, Siegel re motions to compel further document production, data and other information, supplementation, ESI, assignments re same, investigations and review of documentsf	Case Organization, Planning and Strategy
1/12/2024	Mark Johnson	1.5	\$1,150	\$1,725	Download and review D's responses to first set of requests for admission re 317 documents; draft email memo to SW team summarizing same	Discovery (Non-Deposition)
1/12/2024	Mark Johnson	2.3	\$1,150	\$2,645	revise and finish draft of letter to OC re doc request for which supplementation is required; review listed categories against spreadsheet of requests to verify need and make further revisions, incorporate edits from Co-counsel, finalize attachment, com w/ LEC re formatting.	Discovery (Non-Deposition)
1/12/2024	Mark Johnson	0.5	\$1,150	\$575	calls (x5) with G Wallace re discovery motions, supplementation and ESI	Discovery (Non-Deposition)
1/12/2024	Mark Johnson	1.1	\$1,150	\$1,265	draft ltr to OC re supplemental ESI, search terms and custodians, with attachments.	Discovery (Non-Deposition)
1/12/2024	Mark Johnson	0.4	\$1,150	\$460	review transportation docs pulled and saved by T Close	Discovery (Non-Deposition)
1/12/2024	Mark Johnson	0.6	\$1,150	\$690	review docs in relativity and online re potential custodian for supplemental ESI searches; email G Wallace re same and example email	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/12/2024	Mark Johnson	0.4	\$1,150	\$460	review revised ltr brief from B Bien-Kahn re transportation and Fleet Safety docs, comment on same.	Other Motions
1/12/2024	Mark Johnson	0.3	\$1,150	\$345	email to RBGG counsel re MTC responses to interrogatories, draft of same and suggested edits	Other Motions
1/12/2024	Rachel Steyer	0.9	\$750	\$675	weekly meeting with RBGG, BSU, JUB, TCC, MTJ, GBW to discuss and review outstanding tasks and assignments	Case Organization, Planning and Strategy
1/12/2024	Rachel Steyer	0.2	\$750	\$150	reviewing spreadsheet and notes tracking declarant contact info and facility locations for Feb. 1 hearing attendance	Class Outreach and Contact
1/12/2024	Rachel Steyer	0.2	\$750	\$150	call with declarant Miguel Mendoza to review and discuss logistics about attending Feb. 1 hearing	Class Outreach and Contact
1/12/2024	Rachel Steyer	0.3	\$750	\$225	call with San Ramon declarant Julie von Waldegg about attending Feb. 1 hearing	Class Outreach and Contact
1/12/2024	Rachel Steyer	0.2	\$750	\$150	call with declarant Mary Helm to discuss attendance at upcoming Feb. 1 hearing	Class Outreach and Contact
1/12/2024	Rachel Steyer	0.2	\$750	\$150	reviewing draft MTJ letter to OC re supplementation request	Communications With Opposing Counsel
1/12/2024	Rachel Steyer	0.2	\$750	\$150	reviewing BBK draft letter brief re additional depositions	Discovery (Non-Deposition)
1/12/2024	Rachel Steyer	0.2	\$750	\$150	reviewing BBK revisions to plaintiffs' portion of discovery letter brief re fleet safety policy	Discovery (Non-Deposition)
1/12/2024	Rachel Steyer	0.6	\$750	\$450	reviewing defendants response to RFAs	Discovery (Non-Deposition)
1/12/2024	Travis Close	0.3	\$850	\$255	Email to MTJ, GBW re: examples of transportation categories for supplementation	Case Organization, Planning and Strategy
1/12/2024	Travis Close	0.9	\$850	\$765	Meeting with GBW, RLS, MTJ, and co-counsel re: strategy for discovery briefs/MTC, next case conference in front of judge, experts	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/12/2024	Travis Close	0.7	\$850	\$595	Draft template PRA requests for info on transit agencies policies re: wheelchair securement and required transfers	Case Organization, Planning and Strategy
1/12/2024	Travis Close	0.5	\$850	\$425	Review, analyze, and propose edits for draft joint letter brief re: FSP and transportation docs supplementation	Case Organization, Planning and Strategy
1/12/2024	Travis Close	0.2	\$850	\$170	Email to GBW re: inclusiveness of current joint letter brief re transportation services	Case Organization, Planning and Strategy
1/12/2024	Travis Close	0.2	\$850	\$170	Email to LEC re: draft joint letter brief on plaintiffs' supplementation for finalizing	Case Organization, Planning and Strategy
1/12/2024	Travis Close	2.4	\$850	\$2,040	Analyze status of completed discovery for transportation-related categories of docs created by GBW (#s 13-22)	Discovery (Non-Deposition)
1/12/2024	Travis Close	1.4	\$850	\$1,190	Analyze, record, and organize 51 examples of transportation policies/forms/docs cited in categories for supplementation	Discovery (Non-Deposition)
1/12/2024	Travis Close	0.6	\$850	\$510	Review and analyze index of materials produced yesterday by Brookdale; follow up with transportation service-related docs	Discovery (Non-Deposition)
1/13/2024	Guy Wallace	1.4	\$1,350	\$1,890	legal research and analysis re Defendants' argument re Plaintiffs' discovery being disproportionate to the needs of the case	Misc. Research
1/13/2024	Guy Wallace	0.6	\$1,350	\$810	review and analysis of meet and confer letters from MTJ to Defendants re discovery; preparation for MTC's and com's with MTJ re same	Other Motions
1/13/2024	Mark Johnson	1.0	\$1,150	\$1,150	research additional potential custodians for doc searches and revise ltr to OC re proposed search terms and custodians	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/15/2024	Guy Wallace	0.5	\$1,350	\$675	review and analysis of further draft of MTC re transportation documents; com's with BBK; TCC re same	Other Motions
1/15/2024	Mark Johnson	0.3	\$1,150	\$345	review and comment on B Bien-Kahn revised draft letter brief to compel transportation documents	Other Motions
1/15/2024	Mark Johnson	6.8	\$1,150	\$7,820	draft letter brief for order compelling further 30b6 testimony re FSP and transportation; legal research for same, review deposition testimony for same.	Other Motions
1/15/2024	Mark Johnson	0.1	\$1,150	\$115	email exchange w/ James Thornton re data for expert staffing analysis, D's response re status of supplemental production.	Trial and Pretrial Preparation
1/15/2024	Rachel Steyer	0.3	\$750	\$225	reviewing BBK revised fleet safety policy letter brief statement	Discovery (Non-Deposition)
1/16/2024	Guy Wallace	2.7	\$1,350	\$3,645	preparation of MTC re site inspection of Brookhurst; legal research and analysis re same; review and analysis of Plaintiffs' Fourth Amended Complaint and Defendants' Answer	Other Motions
1/16/2024	Guy Wallace	0.8	\$1,350	\$1,080	revise and edit draft MTC re depositions; com's with BBK; MTJ re same	Other Motions
1/16/2024	Guy Wallace	2.3	\$1,350	\$3,105	preparation and drafting of MTC re site inspection of Brookhurst	Other Motions
1/16/2024	Rachel Steyer	0.2	\$750	\$150	reviewing MTJ draft portion of letter brief re additional 30b6 depo for fleet safety policy	Discovery (Non-Deposition)
1/16/2024	Rachel Steyer	0.2	\$750	\$150	reviewing BBK draft joint letter brief re additional depositions	Discovery (Non-Deposition)
1/16/2024	Rachel Steyer	0.2	\$750	\$150	reviewing defendants' response to RFAs Set 2	Discovery (Non-Deposition)
1/16/2024	Travis Close	1.5	\$850	\$1,275	finish analysis & updates to discovery response spreadsheet with Def's responses to ROGs 11-13	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/16/2024	Travis Close	1.6	\$850	\$1,360	Review and analyze Brookdale's latest production for info on issues related to resident accessible transportation	Case Organization, Planning and Strategy
1/16/2024	Travis Close	0.7	\$850	\$595	Review and analyze Def's responses to requests for admissions, sets 1 and 2	Case Organization, Planning and Strategy
1/16/2024	Travis Close	1.5	\$850	\$1,275	Review and analyze Brookdale's latest production for info on issues related to emergency evacuation and planning for residents	Discovery (Non-Deposition)
1/16/2024	Travis Close	1.3	\$850	\$1,105	research transit agency policies re: wheelchair securement and riding on the bus	Experts (Including Retention)
1/17/2024	Guy Wallace	0.5	\$1,350	\$675	review and analysis of email from Bertino re Plaintiffs' proposed custodians and search terms; com's with MTJ re response re same	Discovery (Non-Deposition)
1/17/2024	Guy Wallace	0.9	\$1,350	\$1,215	com's with MTJ; TCC; RLS re Defendants' response re ESI and potential approaches to narrowing Plaintiffs' proposal re ESI	Discovery (Non-Deposition)
1/17/2024	Guy Wallace	0.6	\$1,350	\$810	review and analysis of potential depositions that Plaintiffs should take, including but not limited to the issue of transportation	Discovery (Non-Deposition)
1/17/2024	Guy Wallace	0.7	\$1,350	\$945	legal research and analysis re Defendants' obligation to produce ESI in an individual case as opposed to a class case	Misc. Research
1/17/2024	Guy Wallace	2.6	\$1,350	\$3,510	preparation and drafting of motion to compel site inspection re Brookhurst facility; legal research and analysis re same; review and analysis of Algame testimony and allegations	Other Motions
1/17/2024	Guy Wallace	1.9	\$1,350	\$2,565	preparation and drafting of MTC re Brookhurst site inspection; sections re Algame allegations, responses to Defendants' objections; revise and edit same	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/17/2024	Guy Wallace	0.5	\$1,350	\$675	review and analysis of draft motion re additional depositions	Other Motions
1/17/2024	Mark Johnson	0.2	\$1,150	\$230	draft email to co-counsel re investigation into ED and HWD history at SR and Scotts Valley for purpose of requesting depositions.	Discovery (Non-Deposition)
1/17/2024	Mark Johnson	0.2	\$1,150	\$230	draft email to OC E Rutner and others following up on production of staffing related data.	Discovery (Non-Deposition)
1/17/2024	Mark Johnson	0.2	\$1,150	\$230	review email from Bertino re supplementation and ESI; call w/ G Wallace re issues raised and response to same.	Discovery (Non-Deposition)
1/17/2024	Mark Johnson	1.1	\$1,150	\$1,265	Teams call with G Wallace, R Steyer, T Close to review issue of search terms and custodians re supplemental ESI, plan for revising same and response to J Bertino email; mtn to compel depositions of declarants; review of recently produced documents in lieu of interrogatory responses re alterations.	Discovery (Non-Deposition)
1/17/2024	Mark Johnson	0.9	\$1,150	\$1,035	draft correspondence to opposing counsel responding to search terms for ESI and supplementation of document production; email to COC for review before sending.	Discovery (Non-Deposition)
1/17/2024	Mark Johnson	0.3	\$1,150	\$345	review G Wallace draft ltr brief P section iso request for inspection of Brookhurst facility. email re same	Other Motions
1/17/2024	Rachel Steyer	1.1	\$750	\$825	meeting with GBW, MTJ, TCC to review and discuss ESI search terms, outstanding assignments	Case Organization, Planning and Strategy
1/17/2024	Rachel Steyer	0.2	\$750	\$150	response to GBW about construction documents from Brookhurst	Discovery (Non-Deposition)
1/17/2024	Rachel Steyer	0.2	\$750	\$150	response to MTJ, GBW, TCC, RBGG re additional info and names of EDs and HWDs at Scotts Valley	Discovery (Non-Deposition)
1/17/2024	Rachel Steyer	2.5	\$750	\$1,875	ongoing review of latest productions and updating spreadsheet	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/17/2024	Rachel Steyer	2.5	\$750	\$1,875	reviewing happy camper declarants to identify additional declarants for transportation class	Discovery (Non-Deposition)
1/17/2024	Rachel Steyer	0.2	\$750	\$150	reviewing MTJ edits to joint letter brief re additional depos	Discovery (Non-Deposition)
1/17/2024	Rachel Steyer	0.2	\$750	\$150	reviewing GBW draft of joint letter brief re site inspection of Brookhurst	Discovery (Non-Deposition)
1/17/2024	Travis Close	0.4	\$850	\$340	Review, analyze, and propose revisions for draft joint letter brief re: further 30(b)(6) depo testimony on transportation services	Case Organization, Planning and Strategy
1/17/2024	Travis Close	1.8	\$850	\$1,530	Analyze plaintiffs' proposed search terms in Relativity to determine relevance/targets to current ESI produced	Case Organization, Planning and Strategy
1/17/2024	Travis Close	1.2	\$850	\$1,020	Meeting with RLS, MTJ, GBW to discuss alternative proposal for search terms	Case Organization, Planning and Strategy
1/17/2024	Travis Close	0.2	\$850	\$170	Email to team scheduling meeting to discuss further ESI search terms	Discovery (Non-Deposition)
1/17/2024	Travis Close	0.9	\$850	\$765	Draft analysis of proposed search terms to eliminate based on targeted results in Relativity	Discovery (Non-Deposition)
1/17/2024	Travis Close	1.2	\$850	\$1,020	Create chart of Def's proposed search terms from 12-17-20 and 12-31-20 for further group analysis on our proposed revisions	Discovery (Non-Deposition)
1/18/2024	Guy Wallace	0.6	\$1,350	\$810	initial preparation re hearing on motion for leave re subclasses; com's with MTJ re same	Class Certification
1/18/2024	Guy Wallace	1.3	\$1,350	\$1,755	review and analysis of list of Defendants' ESI search terms; revise and edit same; com's with MTJ; TCC; RLS re same	Discovery (Non-Deposition)
1/18/2024	Guy Wallace	0.7	\$1,350	\$945	review and analysis of Plaintiffs' requested categories of documents for supplementation	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/18/2024	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ; RAB; JM re Brookdale document analysis projects; documents re six facilities; documents re use of SA by the six facilities	Discovery (Non-Deposition)
1/18/2024	Guy Wallace	0.4	\$1,350	\$540	review and analysis of revised list of ESI custodians from MTJ	Discovery (Non-Deposition)
1/18/2024	Guy Wallace	0.5	\$1,350	\$675	revise and edit draft MTC re site inspection of Brookhurst facility; com's with co-counsel re same	Other Motions
1/18/2024	Guy Wallace	0.5	\$1,350	\$675	review and analysis of further draft of MTC re number of interrogatories; com's with co-counsel re same	Other Motions
1/18/2024	Guy Wallace	0.9	\$1,350	\$1,215	revise and edit draft MTC re inspection of Brookhurst; com's with JY; MTJ re same	Other Motions
1/18/2024	Guy Wallace	1.3	\$1,350	\$1,755	preparation of groupings of relevant documents that require supplementation; com's with MTJ re approach to meet and confer and assignments at SW re preparation of motion to compel re same	Other Motions
1/18/2024	Rachel Steyer	0.2	\$750	\$150	reviewing draft RBGG portion of joint letter brief re interrogatory dispute	Discovery (Non-Deposition)
1/18/2024	Rachel Steyer	0.2	\$750	\$150	reviewing email and list of documents for supplementation from GBW with respective assignments	Discovery (Non-Deposition)
1/18/2024	Rachel Steyer	0.2	\$750	\$150	reviewing revised RBGG section of joint letter brief re contention interrogatories	Discovery (Non-Deposition)
1/18/2024	Rachel Steyer	0.2	\$750	\$150	reviewing letter from PA Sen. Casey to Brookdale CEO re staffing data and info	Misc. Research
1/18/2024	Travis Close	0.3	\$850	\$255	Review and analyze draft email to Def's counsel re: ESI and search terms response	Case Organization, Planning and Strategy
1/18/2024	Travis Close	1.4	\$850	\$1,190	Legal research re: whether/when sub-parts of interrogatories count as objectionable "compound" ROGs	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/18/2024	Travis Close	0.4	\$850	\$340	Review, analyze, and propose revisions for draft joint letter brief re: brookhurst inspections	Discovery (Non-Deposition)
1/18/2024	Travis Close	0.4	\$850	\$340	Review, analyze, and propose revisions for draft joint letter brief re: additional interrogatories	Discovery (Non-Deposition)
1/18/2024	Travis Close	0.9	\$850	\$765	Additions and revisions to proposed search terms for ESI & other document supplementation re: fleet safety policy & other transportation policies	Discovery (Non-Deposition)
1/18/2024	Travis Close	0.7	\$850	\$595	Updates to list of search terms with new terms re: brookdale's transportation services	Discovery (Non-Deposition)
1/18/2024	Travis Close	1.3	\$850	\$1,105	Legal research on expense compensable/reimbursable for experts associated with attendance at trial, travel, and depo attendance	Experts (Including Retention)
1/18/2024	Travis Close	1.4	\$850	\$1,190	Legal research on required disclosure of communications between attorneys and experts hired as trial witnesses	Experts (Including Retention)
1/19/2024	Guy Wallace	1.0	\$1,350	\$1,350	initial preparation for hearing on motion for leave re subclasses	Class Certification
1/19/2024	Guy Wallace	0.7	\$1,350	\$945	com's with RLS; RAB re Defendants' productions and further analyses of same re date of documents produced, documents re six facilities	Discovery (Non-Deposition)
1/19/2024	Guy Wallace	0.8	\$1,350	\$1,080	com's with MTJ re Defendants' production of staffing data; information re residents and room assignments; ESI search terms; ESI custodians	Discovery (Non-Deposition)
1/19/2024	Guy Wallace	0.9	\$1,350	\$1,215	team zoom with GG; JY; BBK; AX; AS; KS; MTJ; JAU; TCC; RLS re motions to compel; supplementation of discovery responses (including re statutory damages for access violations); ESI; preparation for hearing on motion re subclasses	Discovery (Non-Deposition)
1/19/2024	Guy Wallace	0.5	\$1,350	\$675	revise and edit draft supplemental interrogatory responses re Algame	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/19/2024	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of revised ESI search terms and potential custodians; revise and edit same	Discovery (Non-Deposition)
1/19/2024	Jennifer Bybee	0.9	\$925	\$833	Zoom meeting with co-counsel re discovery, planning and hearing preparation	Discovery (Non-Deposition)
1/19/2024	Mark Johnson	2.7	\$1,150	\$3,105	further investigation and research of Linked In, discovery responses and doc mgmt system for information about potential custodians for supplemental ESI production; revise and reorganize list, com w/ G Wallace re same	Discovery (Non-Deposition)
1/19/2024	Mark Johnson	0.4	\$1,150	\$460	draft email to SW co-counsel re revised ESI custodian list and email to OC explaining same and inviting input, meet and confer demand	Discovery (Non-Deposition)
1/19/2024	Mark Johnson	2.8	\$1,150	\$3,220	review D's prior search terms and Ps proposal for supplemental ESI. work through proposed revisions and make recommendations, changes for each set of terms, research doc mgmt system for information re same, finalize and share with team.	Discovery (Non-Deposition)
1/19/2024	Mark Johnson	0.3	\$1,150	\$345	preliminary review of Ds response to third set of RFAs re authenticity, etc.	Discovery (Non-Deposition)
1/19/2024	Mark Johnson	1.3	\$1,150	\$1,495	com w/ Wallace re revised search terms and notes, make further revisions, reformat and finalize into version to be sent to Ds	Discovery (Non-Deposition)
1/19/2024	Mark Johnson	0.2	\$1,150	\$230	draft email to OC re follow up with search terms for ESI, need for input and to meet and confer	Discovery (Non-Deposition)
1/19/2024	Mark Johnson	0.1	\$1,150	\$115	review email from OC Rutner re multiple discovery ltr briefs and time for responding; com w/ G Wallace re same	Other Motions
1/19/2024	Mark Johnson	0.3	\$1,150	\$345	email exchange w/ A Xu and others re discovery letter concerning interrogatories; review revised version and comment on same.	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/19/2024	Mark Johnson	0.9	\$1,150	\$1,035	team zoom call w/ Wallace, Grunfeld, Steyer, Close, Yelin, Xu, Bien-kahn, Bybee, Spiegel, Edmundson re supplementing responses to interrogatories, issues re Unruh damages, motions to compel, Ds supplementation of discovery, resident move in data, prep for argument on motion for leave.	Trial and Pretrial Preparation
1/19/2024	Rachel Steyer	0.9	\$750	\$675	weekly meeting with GBW, TCC, MTJ, JUB, RBGG co-counsel to review and discuss outstanding tasks and assignments	Case Organization, Planning and Strategy
1/19/2024	Rachel Steyer	0.2	\$750	\$150	reviewing proposed MTJ email to OC re revised ESI search terms and accompanying list	Communications With Opposing Counsel
1/19/2024	Rachel Steyer	4.2	\$750	\$3,150	ongoing review of production and updating index	Discovery (Non-Deposition)
1/19/2024	Rachel Steyer	0.2	\$750	\$150	reviewing MTJ chart tracking extracted metadata of latest productions	Discovery (Non-Deposition)
1/19/2024	Rachel Steyer	0.2	\$750	\$150	gathering and transmitting name plaintiff depo summaries to KS, question re ADA transportation company re 02/01 hearing	Trial and Pretrial Preparation
1/19/2024	Travis Close	0.2	\$850	\$170	Email to GBW re: new search terms proposed for fleet safety policy	Case Organization, Planning and Strategy
1/19/2024	Travis Close	0.8	\$850	\$680	team meeting re: February hearing, motions to compel, and trial preparation	Case Organization, Planning and Strategy
1/19/2024	Travis Close	0.9	\$850	\$765	Draft section on relevance of resident assessment categories for supplementation to plaintiffs' claims	Case Organization, Planning and Strategy
1/19/2024	Travis Close	0.9	\$850	\$765	Review and analyze defendants' post-2021 productions of resident complaints and issue register data	Depositions
1/19/2024	Travis Close	0.6	\$850	\$510	Analysis of discovery served corresponding to remaining categories of docs needed for supplementation re: Personal Service Assessment & Evaluation	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/19/2024	Travis Close	0.4	\$850	\$340	Analysis of discovery served corresponding to remaining categories of docs needed for supplementation re: Emergency Manuals and Evacuation Plans and Materials	Discovery (Non-Deposition)
1/19/2024	Travis Close	0.6	\$850	\$510	Analysis of discovery served corresponding to remaining categories of docs needed for supplementation re: Complaints & Issue Register	Discovery (Non-Deposition)
1/19/2024	Travis Close	0.5	\$850	\$425	Analysis of discovery served corresponding to remaining categories of docs needed for supplementation re: Fleet Safety Policy & Transportation	Discovery (Non-Deposition)
1/19/2024	Travis Close	0.8	\$850	\$680	Review and analyze most recent examples of resident assessment documents produced which are dated 2022-2023	Discovery (Non-Deposition)
1/19/2024	Travis Close	1.1	\$850	\$935	Draft section on nature and quantity of transportation-related policy docs that have been produced to-date and missing updates of policies	Discovery (Non-Deposition)
1/19/2024	Travis Close	0.5	\$850	\$425	Review and analyze fire drills and other inspection logs produced for P facilities post-2021	Discovery (Non-Deposition)
1/20/2024	Guy Wallace	1.3	\$1,350	\$1,755	preparation for hearing on motion for leave re subclasses	Class Certification
1/21/2024	Mark Johnson	0.4	\$1,150	\$460	call w/ G Wallace re strategy and timing on mtn to compel supplementation and ESI	Other Motions
1/22/2024	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ; RAB; JM re analyses of Defendants' productions re six facilities; Service Alignment	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/22/2024	Guy Wallace	1.3	\$1,350	\$1,755	com's with MTJ; BU re motions to compel; Defendants' non-production of staffing data; ESI and supplementation; further meet and confer with Defendants' re same and implications for schedule; review and analysis of draft emails to opposing counsel re same & revise and edit same	Discovery (Non-Deposition)
1/22/2024	Guy Wallace	0.6	\$1,350	\$810	review and analysis of Defendants' non-responsive Rule 30(b)(6) testimony	Discovery (Non-Deposition)
1/22/2024	Guy Wallace	1.6	\$1,350	\$2,160	revise and edit draft supplemental interrogatory responses re Algarme; com's with co-counsel re same	Discovery (Non-Deposition)
1/22/2024	Guy Wallace	1.1	\$1,350	\$1,485	legal research and analysis re damages under Cal. Civ. Code section 55.56; CACI instruction re same; com's with Uzeta; MTJ re same	Misc. Research
1/22/2024	Guy Wallace	0.3	\$1,350	\$405	com's with RLS re preparation of MTC re happy camper resident files	Other Motions
1/22/2024	Guy Wallace	0.3	\$1,350	\$405	com's with RLS re preparation of MTC re happy camper resident files	Other Motions
1/22/2024	Mark Johnson	0.3	\$1,150	\$345	review email from Bertino and supplemental responses to Carlson rogs with IDs of HWDs and EDs and San Ramon and Scotts Valley; draft email in response re depo ltr brief and ESI custodians.	Discovery (Non-Deposition)
1/22/2024	Mark Johnson	0.1	\$1,150	\$115	email to B Bien-Kahn re position on depo ltr brief revisions based on new information re IDs of EDs and HWDs at San Ramon and Scott's Valley Facilities.	Discovery (Non-Deposition)
1/22/2024	Mark Johnson	0.8	\$1,150	\$920	Teams video conference w/ G Wallace, R Bonner, J Maher re strategy for completing document analysis of service alignment related to six facilities in which Plaintiffs resided.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/22/2024	Mark Johnson	2.2	\$1,150	\$2,530	draft proposed letter to OC for COC review re 4 categories of documents for which final position / production is necessary, preparation of mtns to compel and applicability of 2/8 deadline for same.	Discovery (Non-Deposition)
1/22/2024	Mark Johnson	0.1	\$1,150	\$115	call w/ G Wallace re proposed communication with OC to lay foundation for motion to compel further document production, ESI, supplementation and staffing data.	Other Motions
1/22/2024	Mark Johnson	0.7	\$1,150	\$805	review and analyze Defendants opposition to mtn to compel identities of members of transportation class	Other Motions
1/22/2024	Mark Johnson	0.2	\$1,150	\$230	review and stip from OC Jacobsen re redaction of exhibit to opp to mtn to compel class member identities; coms w/ A Xu re same	Other Motions
1/22/2024	Mark Johnson	3.0	\$1,150	\$3,450	work on declaration iso mtn to compel benchmarks and review potential exhibits for same.	Other Motions
1/22/2024	Mark Johnson	0.2	\$1,150	\$230	call w/ G Wallace re damages analysis and strategy for Unruh Act damages	Trial and Pretrial Preparation
1/22/2024	Rachel Steyer	0.2	\$750	\$150	reviewing defendants supplemental ROG responses	Discovery (Non-Deposition)
1/22/2024	Rachel Steyer	0.8	\$750	\$600	completing review of construction docs in index	Discovery (Non-Deposition)
1/22/2024	Rachel Steyer	0.2	\$750	\$150	call with JAM to discuss and review production indexing project	Discovery (Non-Deposition)
1/22/2024	Rachel Steyer	0.2	\$750	\$150	reviewing TCC portion of supplemental docs description/write up	Discovery (Non-Deposition)
1/22/2024	Rachel Steyer	0.2	\$750	\$150	response to GBW email re MTC resident files	Discovery (Non-Deposition)
1/22/2024	Rachel Steyer	4.4	\$750	\$3,300	drafting MTC/joint letter brief re resident files (also includes time spent doing legal research simultaneously)	Other Motions
1/22/2024	Rachel Steyer	0.6	\$750	\$450	reviewing defendants' opposition to MTC class member contact info	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/22/2024	Travis Close	0.4	\$850	\$340	Review and analyze Def's updated responses to Carlson ROGs; address edits to list of custodians sought	Case Organization, Planning and Strategy
1/22/2024	Travis Close	0.8	\$850	\$680	Legal research on emergency evacuation statutes & regs for assisted-living facilities; incorporate into discussion re: discovery deficiencies	Case Organization, Planning and Strategy
1/22/2024	Travis Close	1.2	\$850	\$1,020	Draft sections on relevance of additional production of complaints to each plaintiff's individual claims	Case Organization, Planning and Strategy
1/22/2024	Travis Close	0.9	\$850	\$765	Draft section on relevance of additional documents re: transportation/ FSP to claims of the plaintiffs and the certified class	Case Organization, Planning and Strategy
1/22/2024	Travis Close	1.6	\$850	\$1,360	Review, analyze, and summaries deficiencies in emergency evacuation policies/guidelines production to-date	Discovery (Non-Deposition)
1/22/2024	Travis Close	1.3	\$850	\$1,105	Further analysis of categories of docs to supplement, including status of production since 2021 and nature/quantity/burden on Ds to produce	Discovery (Non-Deposition)
1/22/2024	Travis Close	0.5	\$850	\$425	Draft email to JIK re: new deadlines for expert reports, rebuttals, trial schedule, and interim strategy	Experts (Including Retention)
1/22/2024	Travis Close	0.9	\$850	\$765	Legal research re CA civil jury instructions for damages re: physical access at public accommodation; send results to GBW	Trial and Pretrial Preparation
1/23/2024	Guy Wallace	2.4	\$1,350	\$3,240	review and analysis of sufficiency of testimony of Bowman and Defendants' Rule 30(b)(6) designees	Discovery (Non-Deposition)
1/23/2024	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re meet and confer emails with Defendants' and their position re 2/8 deadline re motions to compel and response re same	Discovery (Non-Deposition)
1/23/2024	Guy Wallace	1.2	\$1,350	\$1,620	review and analysis of Defendants' opposition re further inspection of Brookhurst facility; legal research and analysis re same; com's with MTJ re same	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/23/2024	Guy Wallace	0.7	\$1,350	\$945	review and analysis of Defendants' opposition re motion to produce class list; com's with BBK and MTJ re same	Other Motions
1/23/2024	Guy Wallace	0.5	\$1,350	\$675	review and analysis of Defendants' opposition re motion to compel further depositions; com's with MTJ re same	Other Motions
1/23/2024	Guy Wallace	0.4	\$1,350	\$540	review and analysis of Defendants' opposition to motion to compel re Fleet Safety Policy	Other Motions
1/23/2024	Guy Wallace	0.7	\$1,350	\$945	analysis of Defendants' oppositions to four discovery motions and themes therein; com's with MTJ re same and potential counterarguments	Other Motions
1/23/2024	Mark Johnson	0.4	\$1,150	\$460	make final changes to email correspondence to OC re 4 categories of unfinished document and data production and deadline for filing motion to compel, review response from OC re same; confer w/ G Wallace re same (.2)	Discovery (Non-Deposition)
1/23/2024	Mark Johnson	0.9	\$1,150	\$1,035	review cases cited by D in opp to mtn for class list and supporting ADA standing argument	Other Motions
1/23/2024	Mark Johnson	5.5	\$1,150	\$6,325	work on mtn to compel benchmark formula, including review of Flores expert declarations, testimony, D's mtn to strike Flores declarations based on alleged misunderstanding of formula	Other Motions
1/23/2024	Mark Johnson	1.3	\$1,150	\$1,495	review and analyze D sections of joint letter briefs re additional depositions, Brookhurst inspection, transportation class contact information.	Other Motions
1/23/2024	Mark Johnson	0.3	\$1,150	\$345	calls w/ G Wallace re Ds sections of letter briefs on Algarme standing for Brookhurst injunctive relief and caselaw re same	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/23/2024	Mark Johnson	0.4	\$1,150	\$460	email exchange w/ A Xu re mtn to compel remaining staffing data; locate, review and forward prior correspondence w/ OC and Thornton re data produced and data needed	Other Motions
1/23/2024	Rachel Steyer	0.3	\$750	\$225	reviewing GBW edits to revised draft supplemental Algarne ROG responses	Discovery (Non-Deposition)
1/23/2024	Rachel Steyer	0.5	\$750	\$375	reviewing defendants' portions of three joint discovery letter briefs re ESI, depositions, Brookhurst site inspection	Discovery (Non-Deposition)
1/23/2024	Rachel Steyer	0.2	\$750	\$150	gathering declaration for GBW for review of draft MTC resident files	Other Motions
1/23/2024	Travis Close	0.6	\$850	\$510	Review and analyze defendants' sections for three joint letter briefs -- brookhurst inspections, transportation policy docs, and additional depositions	Discovery (Non-Deposition)
1/23/2024	Travis Close	0.4	\$850	\$340	Review and analyze recent facility evaluation and complaint investigation reports issued for Chatsworth, Santa Monica, Brookhurst, and Folsom facilities	Discovery (Non-Deposition)
1/23/2024	Travis Close	0.5	\$850	\$425	Revisions to template public records act request to transit agencies for info re: bus policies re: scooter/wheelchair boarding and securement	Discovery (Non-Deposition)
1/23/2024	Travis Close	1.5	\$850	\$1,275	Draft PRA requests and send to: AC Transit, East Bay Paratransit, FAST Connect, Central Contra Costa Transit Authority, and Eastern Contra Costa Transit Authority	Discovery (Non-Deposition)
1/23/2024	Travis Close	0.5	\$850	\$425	Review and analyze defendants' opposition to motion to compel contact list of members of certified class	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/24/2024	Guy Wallace	3.7	\$1,350	\$4,995	review and analysis of Defendants' oppositions to motions to compel re transportation class list; inspection of Brookhurst; Fleet Safety Policy documents; legal research and analysis re same and preparation of reply arguments and points	Other Motions
1/24/2024	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of Defendants' opposition to Plaintiffs' MTC re documents pertaining to the Fleet Safety Policy; review and analysis of district court's order re class certification	Other Motions
1/24/2024	Guy Wallace	0.8	\$1,350	\$1,080	preparation of email to co-counsel re responsive points with respect to Defendants' oppositions to motions for transportation class list; Fleet Safety Policy documents; motion to exceed ten deposition limit	Other Motions
1/24/2024	Guy Wallace	0.9	\$1,350	\$1,215	zoom with GG; JY; BBK; AX; AS; BU; MTJ; TCC; RLS re preparation of further motions to compel re non-produced documents; ESI; deponents; Brookhurst site inspection; staffing data	Other Motions
1/24/2024	Guy Wallace	1.6	\$1,350	\$2,160	revise and edit joint letter brief re Brookhurst site inspection to respond to Defendants' arguments; review and analysis of 4AC	Other Motions
1/24/2024	Mark Johnson	0.2	\$1,150	\$230	review email from OC Rutner re outstanding production; draft email to G Wallace re same and recommendations for follow up	Discovery (Non-Deposition)
1/24/2024	Mark Johnson	0.3	\$1,150	\$345	coms w/ Thorton / Marks re status of staffing data production and analysis of same; com w/ R Bonner re same	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/24/2024	Mark Johnson	0.8	\$1,150	\$920	zoom mtg w/ Wallace, Grunfeld, Xu, Umpierre, Yelin, Close, Steyer, Siegal re Ds' sections of 4 letter briefs and responses to same; other discovery issues re data, ESI, supplementation.	Other Motions
1/24/2024	Rachel Steyer	0.8	\$750	\$600	meeting with RBGG co-counsel, BSU, GBW, MTJ, TCC to review and discuss responses to MTCS and outstanding discovery	Case Organization, Planning and Strategy
1/24/2024	Rachel Steyer	0.5	\$750	\$375	ongoing research for MTC resident files	Discovery (Non-Deposition)
1/24/2024	Rachel Steyer	1.2	\$750	\$900	re-reviewing defendants' ROG and RFP responses to try to identify description of construction/alteration documents	Discovery (Non-Deposition)
1/24/2024	Rachel Steyer	3.8	\$750	\$2,850	reviewing production and preparing category description of supplementation docs for GBW	Discovery (Non-Deposition)
1/24/2024	Travis Close	2.4	\$850	\$2,040	Legal research re: standards for production of class lists in (b)(2) vs. (b)(3) classes	Case Organization, Planning and Strategy
1/24/2024	Travis Close	0.8	\$850	\$680	Team meeting w, MTJ, RLS, GBW, and co-counsel re: responding to Def's revisions in joint letter briefs and other pre-trial preparation	Case Organization, Planning and Strategy
1/24/2024	Travis Close	1.5	\$850	\$1,275	Review, analyze, and organize recent articles on senior living industry elopement falls/deaths/understaffing	Discovery (Non-Deposition)
1/24/2024	Travis Close	1.3	\$850	\$1,105	Draft and send public records act requests to Eastern Contra Costa Transit Authority (Tri Delta Transit) and Golden Gate Bridge, Highway and Transportation District	Discovery (Non-Deposition)
1/24/2024	Travis Close	0.7	\$850	\$595	Review, analyze, and collect earliest versions of the Fleet Safety Policy that have been produced by Brookdale	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/24/2024	Travis Close	0.9	\$850	\$765	Research guides to accessible transportation (including boarding and wheelchair securement) published by NADTC for info on best practices and interpretation of regs	Experts (Including Retention)
1/25/2024	Guy Wallace	1.0	\$1,350	\$1,350	preparation for hearing on motion re leave re subclasses	Class Certification
1/25/2024	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of Bowman deposition testimony as Rule 30(b)(6) designee re ADA compliance and re staffing; analysis of sufficiency of testimony	Discovery (Non-Deposition)
1/25/2024	Guy Wallace	2.1	\$1,350	\$2,835	preparation of notes re subjects, questions and exhibits on which Bowman was an inadequate Rule 30(b)(6) designee	Misc. Research
1/25/2024	Guy Wallace	0.6	\$1,350	\$810	revise and edit MTC re Brookhurst and com's with MTJ re same	Other Motions
1/25/2024	Guy Wallace	0.5	\$1,350	\$675	review and analysis of draft MTC re depositions; com's with BBK; RLS re same	Other Motions
1/25/2024	Guy Wallace	3.1	\$1,350	\$4,185	review and analysis of sufficiency of Bowman's Rule 30(b)(6) testimony; com's with MTJ re MTC re same	Other Motions
1/25/2024	Mark Johnson	0.5	\$1,150	\$575	review prior emails re staffing related data; draft email to Thornton with same and summaries; com w/ B Umpierre, J Thornton re scheduling a mtg.	Discovery (Non-Deposition)
1/25/2024	Mark Johnson	0.5	\$1,150	\$575	review revised draft of Brookhurst inspection joint letter brief; email to G Wallace with proposed edits.	Other Motions
1/25/2024	Mark Johnson	7.5	\$1,150	\$8,625	work on mtn to compel production of benchmark formula; legal research and review of testimony, pleadings for same; coms w/ G Wallace re Bowman 30(b)(6) testimony for same.	Other Motions
1/25/2024	Rachel Steyer	0.2	\$750	\$150	reviewing updated GBW draft MTC Brookhurst site inspection	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/25/2024	Rachel Steyer	4.2	\$750	\$3,150	review of RFA responses, tallying and analyzing admissions and objections	Discovery (Non-Deposition)
1/25/2024	Rachel Steyer	0.4	\$750	\$300	reviewing BBK edits to MTC additional depositions	Discovery (Non-Deposition)
1/25/2024	Rachel Steyer	0.2	\$750	\$150	reviewing BBK revised draft portion of MTC FSP ESI	Discovery (Non-Deposition)
1/25/2024	Rachel Steyer	0.3	\$750	\$225	call with GBW to discuss review of witness statements and RFAs	Misc. Research
1/25/2024	Travis Close	2.3	\$850	\$1,955	Review and analyze recent DSS complaint investigation & facility evaluation reports from Plaintiff facilities to determine dates of tenure for EDs	Case Organization, Planning and Strategy
1/25/2024	Travis Close	0.2	\$850	\$170	Email to RLS re: question about Def's RFA responses	Case Organization, Planning and Strategy
1/25/2024	Travis Close	0.4	\$850	\$340	Email to team re: admissions from Def's opposition to motion to compel class list	Case Organization, Planning and Strategy
1/25/2024	Travis Close	0.9	\$850	\$765	Legal research re: FRCP rules regarding discretion to grant addition depositions	Depositions
1/25/2024	Travis Close	1.6	\$850	\$1,360	Create spreadsheet/table of documents sought in RFAs, Sets 1-3	Discovery (Non-Deposition)
1/25/2024	Travis Close	0.4	\$850	\$340	Review, analyze, and propose revisions for draft joint letter brief re: additional depositions	Discovery (Non-Deposition)
1/25/2024	Travis Close	0.4	\$850	\$340	Review, analyze, and propose revisions for joint letter brief re: additional inspections at Brookhurst facility	Discovery (Non-Deposition)
1/26/2024	Guy Wallace	1.0	\$1,350	\$1,350	preparation for hearing on motion for leave re subclasses; com's with JAU re same	Class Certification
1/26/2024	Guy Wallace	0.9	\$1,350	\$1,215	preparation of summary of key areas on which Defendants' Rule 30(b)(6) designees lacked knowledge and were inadequate; analysis of same	Depositions
1/26/2024	Guy Wallace	1.1	\$1,350	\$1,485	com's with DTM; JGT; BP; BU; MTJ re deficiencies in Defendants' production of data	Discovery (Non-Deposition)
1/26/2024	Guy Wallace	2.2	\$1,350	\$2,970	revise and edit draft MTC re resident files	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/26/2024	Guy Wallace	1.2	\$1,350	\$1,620	com's with BBK; AX; MTJ; RLS re motion to compel re Defendants' inadequate Rule 30(b)(6) deposition testimony re various topics and exhibits	Other Motions
1/26/2024	Guy Wallace	0.9	\$1,350	\$1,215	zoom with GG; BBK; AX; AS; KS; BU; MTJ; JAU; TCC; RLS re motions to compel	Other Motions
1/26/2024	Jennifer Bybee	0.5	\$925	\$463	Zoom meeting with co-counsel re discovery	Discovery (Non-Deposition)
1/26/2024	Mark Johnson	1.1	\$1,150	\$1,265	video conference w/ Wallace, Thornton, Marks, Peters, Umpierre re status / completeness of production of staffing data; review numbers showing problems with same, scope of additional production; timing of staffing analyses.	Experts (Including Retention)
1/26/2024	Mark Johnson	0.2	\$1,150	\$230	draft email to B Peters re time periods for staffing analysis for each of 5 facilities	Experts (Including Retention)
1/26/2024	Mark Johnson	2.7	\$1,150	\$3,105	work on mtn and declaration in support of motion for benchmark formula	Other Motions
1/26/2024	Mark Johnson	1.0	\$1,150	\$1,150	video conference w/ A Xu, G Wallace, R Steyer, B Bien-Kahn re strategy on mtn to compel additional 30(b)(6) testimony based on inadequate testimony from Bowman on multiple issues, including discussion of testimony, priorities by topic	Other Motions
1/26/2024	Mark Johnson	0.7	\$1,150	\$805	zoom team call w/ Wallace, Xu, Bybee, Stilber, Steyer, Grunfeld, Umpierre, Close, Bien-Kahn, Edmundson, Spiegel re status and strategy on multiple motions to compel, communications with OC	Other Motions
1/26/2024	Mark Johnson	0.8	\$1,150	\$920	review final versions of letter briefs on additional depositions and Brookhurst inspection for filing; coms w/ L Castro re same; additional coms re filing of corrected versions.	Other Motions
1/26/2024	Mark Johnson	1.8	\$1,150	\$2,070	work on mtn to compel benchmark formula	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/26/2024	Mark Johnson	1.1	\$1,150	\$1,265	calls w/ G Wallace (x6) re staffing data, mtn to compel inspection of Brookhurst, Mtn to compel additional depos, analysis of 30(b)(6) testimony, ltr brief re additional 30(b)(6) examination re FSP	Other Motions
1/26/2024	Mark Johnson	0.5	\$1,150	\$575	review and draft responses to emails from Bertino, Rutner re unwillingness to prepare D section of ltr brief re additional 30b6 testimony on FSP, argument re entitlement to discovery on "facial challenge" to FSP	Other Motions
1/26/2024	Mark Johnson	0.1	\$1,150	\$115	review and comment on draft email from A Xu to OC re filing redacted documents	Other Motions
1/26/2024	Mark Johnson	0.2	\$1,150	\$230	draft emails to OC re final edits to letter briefs re Brookhurst inspections and additional depos, sign off on same.	Other Motions
1/26/2024	Mark Johnson	0.2	\$1,150	\$230	review G Wallace summary of IDK responses on categories of 30b6 topics.	Other Motions
1/26/2024	Rachel Steyer	0.5	\$750	\$375	weekly meeting with RBGG co-counsel, BSU, GBW, TCC, MTJ, JUB re ongoing tasks and assignments	Case Organization, Planning and Strategy
1/26/2024	Rachel Steyer	0.2	\$750	\$150	reviewing GBW compilation/summary of Bowman depo testimony/authentication issues	Depositions
1/26/2024	Rachel Steyer	0.7	\$750	\$525	reviewing defendants' revised portions to four letter briefs	Discovery (Non-Deposition)
1/26/2024	Rachel Steyer	1.6	\$750	\$1,200	ongoing review of defendants' response to RFAs, compiling spreadsheet tracking responses	Discovery (Non-Deposition)
1/26/2024	Rachel Steyer	0.9	\$750	\$675	meeting with AX, BBK, GBW, MTJ to discuss approach to additional 30b6 depos strategy/MTC	Discovery (Non-Deposition)
1/26/2024	Rachel Steyer	0.6	\$750	\$450	gathering relevant documents with 30b6 authentication issues, transmitting to AX, GBW, MTJ, BBK	Discovery (Non-Deposition)
1/26/2024	Rachel Steyer	0.6	\$750	\$450	reviewing and drafting/incorporating GBW edits into MTC resident files	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/26/2024	Rachel Steyer	0.2	\$750	\$150	email to GBW transmitting revised MTC and questions about docs	Discovery (Non-Deposition)
1/26/2024	Travis Close	0.8	\$850	\$680	collect recent DSS reports from Scotts Valley & email to team to supply evidence of facility EDs/BOMs	Case Organization, Planning and Strategy
1/26/2024	Travis Close	1.6	\$850	\$1,360	Legal research re: examples where court relied on class member testimony to demonstrate evidence of unlawfulness under (b)(2) class	Case Organization, Planning and Strategy
1/26/2024	Travis Close	1.3	\$850	\$1,105	Legal research re: whether courts rely on testimony from class members in certifying rule 23(b)(2) class actions	Case Organization, Planning and Strategy
1/26/2024	Travis Close	0.7	\$850	\$595	Draft public records act request & send to Livermore-Amador Valley Transit Authority ("Tri-Valley Wheels")	Case Organization, Planning and Strategy
1/26/2024	Travis Close	0.2	\$850	\$170	Email to AXU (co-counsel) re: question about EDs tenure at Scotts Valley facility	Case Organization, Planning and Strategy
1/26/2024	Travis Close	0.3	\$850	\$255	Email to team sharing findings of research re: 23(b)(2) classes and evidence from class members	Case Organization, Planning and Strategy
1/26/2024	Travis Close	1.3	\$850	\$1,105	Legal research re: whether claim preclusion as to later (b)(3) damages in (b)(2) injunctive relief class warrants notice to class members	Class Outreach and Contact
1/26/2024	Travis Close	0.6	\$850	\$510	Review and analyze revised versions of four joint letter briefs, shared today (ROG limits, Fleet safety policy, site inspections, and addition depos) for substantive changes and consistency	Discovery (Non-Deposition)
1/26/2024	Travis Close	0.6	\$850	\$510	Meeting with RLS, MTJ, GBW, JUB, and co-counsel re: discovery pending letter briefs to compel, expert data, def's responses to ROGs	Trial and Pretrial Preparation
1/27/2024	Guy Wallace	1.3	\$1,350	\$1,755	preparation for hearing on motion for leave re subclasses; com's with JAU re same	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/27/2024	Guy Wallace	0.8	\$1,350	\$1,080	analysis of and com's with MTJ; JAU re preparation for hearing re motion for leave re subclasses; consumer fraud subclasses	Class Certification
1/27/2024	Guy Wallace	0.6	\$1,350	\$810	legal research and analysis re class list issue and (b)(2) cases; com's with MTJ; BBK re same	Other Motions
1/27/2024	Jennifer Bybee	1.1	\$925	\$1,018	Review Motion for Leave and Motion to Strike Motion for Leave	Class Certification
1/27/2024	Jennifer Bybee	0.2	\$925	\$185	Search for example motions for reconsideration on server and review same	Class Certification
1/27/2024	Jennifer Bybee	0.8	\$925	\$740	Com's with GBW re motion for reconsideration / subclasses	Class Certification
1/27/2024	Jennifer Bybee	0.1	\$925	\$93	Draft email to GBW re summary of conversation re hearing	Class Certification
1/27/2024	Mark Johnson	0.7	\$1,150	\$805	call w/ G Wallace re strategy on oral argument on mtn for leave w/r/t staffing claims and Lytle, bifurcation, suspension of ruling on staffing claims	Other Motions
1/27/2024	Mark Johnson	0.3	\$1,150	\$345	pull Willits decision from Judge Larson re class list and discuss same w/ G Wallace re mtn to compel class list in B2 context	Other Motions
1/28/2024	Guy Wallace	5.6	\$1,350	\$7,560	preparation of argument notes for hearing on motion for leave re subclasses	Class Certification
1/29/2024	Guy Wallace	4.6	\$1,350	\$6,210	preparation of argument notes re hearing on motion for leave re subclasses	Class Certification
1/29/2024	Guy Wallace	0.6	\$1,350	\$810	com's with Bertino; JY; BBK; MTJ re Defendants' proposed additional deposition	Discovery (Non-Deposition)
1/29/2024	Guy Wallace	0.6	\$1,350	\$810	review and analysis of Defendants' further revisions re MTC re FSP; com's with co-counsel re same	Other Motions
1/29/2024	Guy Wallace	1.4	\$1,350	\$1,890	review and analysis of further drafts of reply brief re motion to compel class list re transportation class; com's with JY; BBK; AS re same	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/29/2024	Jennifer Bybee	0.2	\$925	\$185	Email to GBW re quote re Gilliam said we could ask for access subclasses.	Class Certification
1/29/2024	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW re strategy on reply iso discovery of Transportation class class list, prep for oral argument on mtn for leave to certify subclasses, mtns to strike and sanctions mts, including position on deferring ruling on staffing-related classes	Case Organization, Planning and Strategy
1/29/2024	Mark Johnson	0.6	\$1,150	\$690	call w/ Rita Stiner re billing, interaction with Brookdale staff, visits to facility, Stacy's complaints, supplemental document production, deposition.	Discovery (Non-Deposition)
1/29/2024	Mark Johnson	0.2	\$1,150	\$230	email exchange w/ Blake Peters re range for staffing data; review docs re same	Experts (Including Retention)
1/29/2024	Mark Johnson	0.1	\$1,150	\$115	review Jacobson email re filing redacted versions of pleadings	Other Motions
1/29/2024	Mark Johnson	0.1	\$1,150	\$115	review and analyze E Rutner email re relevance of 30b6 transportation depo	Other Motions
1/29/2024	Mark Johnson	0.1	\$1,150	\$115	review D edits to draft letter brief re mtn to compel documents related to transportation, FSP	Other Motions
1/29/2024	Mark Johnson	1.3	\$1,150	\$1,495	review and propose edits to reply iso mtn for class contact information; draft email with comments	Other Motions
1/29/2024	Mark Johnson	0.2	\$1,150	\$230	review and draft response to email from OC Rutner re position on 30b6 depo on FSP in event court rules on other mtn re FSP docs in their favor.	Other Motions
1/29/2024	Mark Johnson	0.5	\$1,150	\$575	call w G Wallace re argument on mtn for leave to seek subclasses, potential position / questions from court, arguments to be made in response on staffing/damages issues.	Other Motions
1/29/2024	Mark Johnson	0.8	\$1,150	\$920	review and edit draft letter brief section re additional interrogatories.	Other Motions
1/29/2024	Mark Johnson	2.7	\$1,150	\$3,105	work on mtn to compel benchmark formula	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/29/2024	Rachel Steyer	0.2	\$750	\$150	call with Tina Howard to provide update about case	Class Outreach and Contact
1/29/2024	Rachel Steyer	0.2	\$750	\$150	reviewing defendants' revised portion of MTC FSP docs	Discovery (Non-Deposition)
1/29/2024	Rachel Steyer	0.2	\$750	\$150	chat on teams with RAB, NT, JAM concerning work on discovery index and review	Discovery (Non-Deposition)
1/29/2024	Rachel Steyer	0.2	\$750	\$150	call with RAB to review and discuss completing index and reviewing latest productions	Discovery (Non-Deposition)
1/29/2024	Rachel Steyer	0.4	\$750	\$300	reviewing billing documents for Stacia Stiner in newer productions for discount info	Discovery (Non-Deposition)
1/29/2024	Rachel Steyer	0.2	\$750	\$150	reviewing AX edits to MTC re interrogatory limit	Discovery (Non-Deposition)
1/29/2024	Rachel Steyer	3.1	\$750	\$2,325	reviewing additional productions and updating index	Discovery (Non-Deposition)
1/29/2024	Rachel Steyer	0.5	\$750	\$375	reviewing draft reply MTC transportation class contact info	Other Motions
1/29/2024	Rachel Steyer	0.7	\$750	\$525	conducting legal cite check to BBK reply brief re MTC transportation class info	Other Motions
1/29/2024	Travis Close	1.6	\$850	\$1,360	Review and analyze DSS complaint investigation and facility evaluation reports at plaintiffs' facilities (Brookhurst, Hemet, Fountaingrove) related to emergency evac & planning concerns	Case Organization, Planning and Strategy
1/29/2024	Travis Close	1.4	\$850	\$1,190	Review and analyze DSS complaint investigation and facility evaluation reports at plaintiffs' facilities (Tracy, Scotts Valley, San Ramon) related to emergency evac & planning concerns	Case Organization, Planning and Strategy
1/29/2024	Travis Close	0.3	\$850	\$255	Review and analyze Def's revisions to joint letter brief re: fleet safety policy	Discovery (Non-Deposition)
1/29/2024	Travis Close	1.3	\$850	\$1,105	Analyze cases provided by GBW for argument that (b)(2) class actions require proof from class members to prevail at trial	Discovery (Non-Deposition)
1/29/2024	Travis Close	0.8	\$850	\$680	Review, analyze, and provide revisions for Pltf's reply iso motion to compel class member contact info	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/29/2024	Travis Close	0.6	\$850	\$510	Review and analyze def's production of job descriptions for positions related to service alignment	Discovery (Non-Deposition)
1/29/2024	Travis Close	0.9	\$850	\$765	Analyze cases cited by Defendants for proposition that production of class member contact info in (b)(2) class would require decertification	Pleadings and Motions Re: Pleadings
1/29/2024	Travis Close	1.4	\$850	\$1,190	Cite checks & revisions (pages 7-12) to draft reply iso motion to compel class contact information	Pleadings and Motions Re: Pleadings
1/30/2024	Guy Wallace	3.2	\$1,350	\$4,320	preparation of argument notes re class certification; preparation for moot re 2/1/24 hearing	Class Certification
1/30/2024	Guy Wallace	1.1	\$1,350	\$1,485	zoom with GG; JY; BU; MTJ; JAU re preparation for 2/1 oral argument	Class Certification
1/30/2024	Guy Wallace	0.4	\$1,350	\$540	com's with BU re preparation for 2/1 oral argument	Class Certification
1/30/2024	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ re Defendants' arguments re burden and further certification; commonality issues re resident rooms	Class Certification
1/30/2024	Guy Wallace	0.3	\$1,350	\$405	com's with JAU re preparation for hearing on motion re subclasses	Class Certification
1/30/2024	Guy Wallace	1.5	\$1,350	\$2,025	analysis of results of moot court re 2/1 hearing re subclasses; preparation of notes re same	Class Certification
1/30/2024	Guy Wallace	1.5	\$1,350	\$2,025	review and analysis of notes from GG re hearing preparation; analysis of Waters and Mastin reports re barriers in resident rooms & com's with MTJ re same	Class Certification
1/30/2024	Guy Wallace	0.6	\$1,350	\$810	com's with Waters re preparation for hearing on motion re subclasses	Experts (Including Retention)
1/30/2024	Guy Wallace	0.6	\$1,350	\$810	com's with BBK; MTJ; TCC re Fleet Safety Policy and discovery and expert testimony issues	Other Motions
1/30/2024	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ; BU re motion to compel re non-produced staffing data	Other Motions
1/30/2024	Jennifer Bybee	1.1	\$925	\$1,018	Moot of GBW's argument re Motion for Leave and Motion to Strike	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/30/2024	Mark Johnson	0.3	\$1,150	\$345	review and participate in email exchanges w/ T Close and B Bien Kahn analyzing regs bearing on legality of Fleet Safety Policy, regulatory history and purpose; relevance of fleet size / vehicle size.	Case Organization, Planning and Strategy
1/30/2024	Mark Johnson	1.4	\$1,150	\$1,610	moot court for oral argument on motion for leave to seek subclasses, mtn to strike and mtns for sanctions	Class Certification
1/30/2024	Mark Johnson	1.4	\$1,150	\$1,610	review analysis from experts of missing staffing data for six facilities; revise and reformat summary for transmission to opposing counsel.	Discovery (Non-Deposition)
1/30/2024	Mark Johnson	0.2	\$1,150	\$230	call w/ J Thornton re audit of Def Supplemental data production and sharing same w/ OC	Discovery (Non-Deposition)
1/30/2024	Mark Johnson	1.5	\$1,150	\$1,725	review briefing on mtn for leave to seek subclasses in prep for moot court on argument	Other Motions
1/30/2024	Mark Johnson	3.4	\$1,150	\$3,910	assist G Wallace in prep for oral argument on mtn for leave to seek access subclasses, including review and analysis of stip re typicality of inspected units, com re same; review and analysis of Waters / Mastin declarations and barrier reports for purpose of comparing types of barriers among resident rooms within facilities to show commonality; draft memo summarizing same.	Other Motions
1/30/2024	Mark Johnson	0.4	\$1,150	\$460	preliminary review of Umpierre draft of mtn to compel staffing data; email exchange re same and proposed addition.	Other Motions
1/30/2024	Mark Johnson	0.7	\$1,150	\$805	calls (x3) with G Wallace re prep for argument on mtn for leave to seek subclass certification, access subclasses.	Other Motions
1/30/2024	Mark Johnson	0.3	\$1,150	\$345	review further revised section of ltr brief re FSP and offer additional proposed edits to B Bien Kahn for same.	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/30/2024	Mark Johnson	0.2	\$1,150	\$230	email exchange w/ A Xu re edits to ltr brief re interrogatories and approach to exhibits.	Other Motions
1/30/2024	Mark Johnson	0.4	\$1,150	\$460	email exchanges w/ Bertino and Rutner re incomplete staffing data and need to move to compel complete data.	Other Motions
1/30/2024	Rachel Steyer	0.2	\$750	\$150	reviewing MTJ email to OC identifying deficiencies in staffing produced data	Communications With Opposing Counsel
1/30/2024	Rachel Steyer	5.9	\$750	\$4,425	reviewing and updating discovery index	Discovery (Non-Deposition)
1/30/2024	Rachel Steyer	0.2	\$750	\$150	reviewing email from TCC summarizing history behind transfer rule	Misc. Research
1/30/2024	Travis Close	0.2	\$850	\$170	Email to RLS re: today's moot session to prep for Thursday's hearing	Case Organization, Planning and Strategy
1/30/2024	Travis Close	0.7	\$850	\$595	Draft analysis to team re: coverage requirements and for DOT/DOJ regulations affecting the fleet safety policy	Case Organization, Planning and Strategy
1/30/2024	Travis Close	0.4	\$850	\$340	Email to BBK re: accessibility regulations and minimum fleet size	Case Organization, Planning and Strategy
1/30/2024	Travis Close	1.5	\$850	\$1,275	Legal research on basis for DOJ's decision to prohibit mandatory transfers on transit buses	Case Organization, Planning and Strategy
1/30/2024	Travis Close	2.4	\$850	\$2,040	Legal research on provisions in 49 CFR Part 37 requiring different levels of accessibility depending on fleet size or bus size	Case Organization, Planning and Strategy
1/30/2024	Travis Close	1.2	\$850	\$1,020	Draft analysis to team responding to Brookdale's anticipated argument re: size of fleet and FSP	Case Organization, Planning and Strategy
1/31/2024	Guy Wallace	0.7	\$1,350	\$945	preparation for hearing on motion for subclasses; com's with MTJ re same	Class Certification
1/31/2024	Guy Wallace	4.5	\$1,350	\$6,075	preparation and drafting of argument notes re hearing on motion for leave re subclasses	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/31/2024	Guy Wallace	2.1	\$1,350	\$2,835	preparation for argument re subclasses motion; revise affirmative argument; review and analysis of Evenflo decision and inference of overpayment	Class Certification
1/31/2024	Guy Wallace	2.0	\$1,350	\$2,700	analysis of and com's with MTJ; TCC' RLS re motions to compel re supplementation and resident files	Other Motions
1/31/2024	Jennifer Bybee	0.1	\$925	\$93	Email to GBW re moot of argument re MFL	Class Certification
1/31/2024	Mark Johnson	0.4	\$1,150	\$460	further conference w/ G Wallace re certification of facility based access claims commonality of barriers across units within facilities.	Other Motions
1/31/2024	Mark Johnson	0.4	\$1,150	\$460	Teams call w Wallace, Close, Steyer re ltr brief re supplementation and ESI	Other Motions
1/31/2024	Mark Johnson	0.3	\$1,150	\$345	call w/ B Umpierre re ltr brief iso mtn to compel staffing data, declaration re same.	Other Motions
1/31/2024	Mark Johnson	1.5	\$1,150	\$1,725	review and propose edits to ltr brief and dec iso ltr brief to compel complete staffing data; email coms w/ COC Umpierre re same	Other Motions
1/31/2024	Mark Johnson	6.0	\$1,150	\$6,900	work on letter brief and declaration iso of letter brief to compel supplementation of doc production and ESI; review prior email communications, summaries of document production and other materials re same; coms w/ R Bonner and R Steyer re analysis of past productions, emails and dates of production for same.	Other Motions
1/31/2024	Mark Johnson	3.5	\$1,150	\$4,025	assist G Wallace in preparation for argument on mtn for leave to seek subclasses, mtn to strike and for sanctions, including calls re arguments and strategy x 6 (1.9), look up and send facts for argument	Other Motions
1/31/2024	Mark Johnson	0.2	\$1,150	\$230	call w/ G re need for mtc supplementation of document production; best approach for same.	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/31/2024	Rachel Steyer	0.5	\$750	\$375	meeting with GBW, MTJ, TCC to review and discuss putting together letter brief re supplementation	Discovery (Non-Deposition)
1/31/2024	Rachel Steyer	0.2	\$750	\$150	response to MTJ re Brookdale ROG re construction docs	Discovery (Non-Deposition)
1/31/2024	Rachel Steyer	0.5	\$750	\$375	revising MTC declarant resident files	Discovery (Non-Deposition)
1/31/2024	Rachel Steyer	0.2	\$750	\$150	reviewing portion circulated by TCC of letter brief re supplementation and GBW outline	Discovery (Non-Deposition)
1/31/2024	Rachel Steyer	0.2	\$750	\$150	reviewing BSU draft MTC missing staffing data	Discovery (Non-Deposition)
1/31/2024	Rachel Steyer	0.2	\$750	\$150	reviewing MTJ additions to draft MTC document supplementation	Discovery (Non-Deposition)
1/31/2024	Rachel Steyer	0.2	\$750	\$150	reviewing notes for response re supplementation of docs language	Discovery (Non-Deposition)
1/31/2024	Rachel Steyer	0.4	\$750	\$300	reviewing and tallying partial productions post 2021	Discovery (Non-Deposition)
1/31/2024	Rachel Steyer	0.7	\$750	\$525	drafting and transmitting paragraph to TCC, GBW, MTJ re supplementation of docs	Discovery (Non-Deposition)
1/31/2024	Rachel Steyer	1.8	\$750	\$1,350	updating and reviewing index of recent prodcutions	Discovery (Non-Deposition)
1/31/2024	Rachel Steyer	0.2	\$750	\$150	reviewing and transmitting depo excerpt for GBW	Misc. Research
1/31/2024	Rachel Steyer	0.3	\$750	\$225	call with GBW to reivew and discuss barriers and edits to draft MTC resident files	Other Motions
1/31/2024	Rachel Steyer	1.3	\$750	\$975	reviewing and compiling declaration excerpts for GBW	Other Motions
1/31/2024	Travis Close	0.4	\$850	\$340	Review, analyze, and propose revisions to revised draft joint letter brief re: additional documents related to the fleet safety policy enforcement	Case Organization, Planning and Strategy
1/31/2024	Travis Close	0.9	\$850	\$765	Meet with MTJ, GBW, RLS re: joint letter brief on supplementation of doc categories	Case Organization, Planning and Strategy
1/31/2024	Travis Close	0.8	\$850	\$680	Legal research re: deliberative process privilege in public records act litigation	Case Organization, Planning and Strategy
1/31/2024	Travis Close	1.2	\$850	\$1,020	Edits to assigned section of joint letter brief re: supplementation of document categories	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/31/2024	Travis Close	2.4	\$850	\$2,040	draft my assigned section of joint letter brief re: supplementation	Discovery (Non-Deposition)
1/31/2024	Travis Close	1.8	\$850	\$1,530	Analyze categories of document for supplementation to match to document requests served by Pltfs	Discovery (Non-Deposition)
1/31/2024	Travis Close	0.8	\$850	\$680	Review and analyze fourth amended complaint to determine categories of claims made by each individual plaintiff	Pleadings and Motions Re: Pleadings
2/1/2024	Guy Wallace	0.6	\$1,350	\$810	preparation of notes re oral argument on Plaintiffs' motion for leave re subclasses	Class Certification
2/1/2024	Guy Wallace	2.4	\$1,350	\$3,240	preparation for hearing on motion for leave re subclasses	Class Certification
2/1/2024	Guy Wallace	1.6	\$1,350	\$2,160	prepare for and attend oral argument re hearing on motion for subclasses	Class Certification
2/1/2024	Guy Wallace	1.1	\$1,350	\$1,485	com's with GG; JY; BU; MTJ; JAU; RLS re results of hearing re motion for leave re subclasses	Class Certification
2/1/2024	Guy Wallace	1.1	\$1,350	\$1,485	revise and edit draft MTC letters re transportation depo; supplementation and MTJ draft declaration re same; resident files; com's with MTJ; RLS re same	Other Motions
2/1/2024	Jennifer Bybee	0.4	\$925	\$370	Com's with GBW re hearing on MFL re subclasses	Class Certification
2/1/2024	Mark Johnson	0.6	\$1,150	\$690	calls w/ G Wallace re hearing on mtn for leave to seek certification of subclasses, possible outcome and ramifications of same, follow up.	Class Certification
2/1/2024	Mark Johnson	1.0	\$1,150	\$1,150	attend hearing on mtn for leave to seek certification of subclasses	Other Motions
2/1/2024	Mark Johnson	1.1	\$1,150	\$1,265	meet w/ COC and clients at courthouse before and after hearing on mtn for leave to seek certification of subclasses.	Other Motions
2/1/2024	Mark Johnson	0.4	\$1,150	\$460	review and analyze D section of ltr brief re further 30(b))6 depo testimony on FSP; coms /w COC & G Wallace re same (.1)	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/1/2024	Mark Johnson	0.5	\$1,150	\$575	review and analyze statistics on data production and ESI from R Bonner for mtn to compel supplementation and coms re same.	Other Motions
2/1/2024	Mark Johnson	3.0	\$1,150	\$3,450	continue drafting dec iso mtn for supplementation and ESI; review prior coms and other material for same; revise draft letter and share both with COC	Other Motions
2/1/2024	Mark Johnson	1.6	\$1,150	\$1,840	work on revisions to P section of ltr brief re futher 30b6 testimony on FSP; coms w/ G Wallace re same; incorporate edits, email transmitting same to OC	Other Motions
2/1/2024	Mark Johnson	1.4	\$1,150	\$1,610	continue work on ltr brief and supporting dec re supplementation of docs and ESI; incorporate suggested edits to ltr, draft email to COC transmitting draft of ltr	Other Motions
2/1/2024	Mark Johnson	0.3	\$1,150	\$345	call w T Close re contribution of information to draft dec iso ltr brief seeking order compelling supplementation and ESI	Other Motions
2/1/2024	Rachel Steyer	0.3	\$750	\$225	reviewing defendants portion of 30b6 depo MTC	Communications With Opposing Counsel
2/1/2024	Rachel Steyer	0.3	\$750	\$225	reviewing JSY edits and incorporating into draft MTC declarant resident files	Discovery (Non-Deposition)
2/1/2024	Rachel Steyer	0.4	\$750	\$300	reviewing and editing MTJ draft declaration and MTC supplemental production of docs	Discovery (Non-Deposition)
2/1/2024	Rachel Steyer	0.5	\$750	\$375	drafting paragraphs for MTJ declaration for supplementation	Discovery (Non-Deposition)
2/1/2024	Rachel Steyer	0.3	\$750	\$225	re-doing JSY and incorporating GBW edits to MTC resident files	Discovery (Non-Deposition)
2/1/2024	Rachel Steyer	0.2	\$750	\$150	transmitting draft MTC resident files to OC, RBGG co-counsel, BSU, GBW, MTJ, TCC	Discovery (Non-Deposition)
2/1/2024	Rachel Steyer	1.0	\$750	\$750	attended hearing for motion for leave for certification of subclasses	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/1/2024	Travis Close	0.8	\$850	\$680	Review and analyze declaration excerpts from class members who were impacted by Brookdale's transportation policies	Case Organization, Planning and Strategy
2/1/2024	Travis Close	0.4	\$850	\$340	Call with MTJ re: edits needed to joint letter brief re: supplementation	Case Organization, Planning and Strategy
2/1/2024	Travis Close	1.6	\$850	\$1,360	Edits to declaration of MTJ iso joint letter brief re: supplementation	Case Organization, Planning and Strategy
2/1/2024	Travis Close	1.6	\$850	\$1,360	Legal research re: extent of supplementation required after denial of class certification	Case Organization, Planning and Strategy
2/1/2024	Travis Close	1.6	\$850	\$1,360	Analysis of docs categories requested in supplementation vs. categories requested in RFPs 9 & 10	Case Organization, Planning and Strategy
2/1/2024	Travis Close	0.4	\$850	\$340	Further revisions to draft joint letter brief re: supplementation	Case Organization, Planning and Strategy
2/1/2024	Travis Close	0.4	\$850	\$340	Review, analyze, and propose revisions for draft joint letter brief re: resident files of residents who submitted declarations for defendants	Case Organization, Planning and Strategy
2/1/2024	Travis Close	0.2	\$850	\$170	Email to RLS re: categories for supplementation vs. docs produced recently	Case Organization, Planning and Strategy
2/2/2024	Guy Wallace	0.8	\$1,350	\$1,080	com's with BBK; AX; MTJ; RLS re discovery issues and motions to compel	Discovery (Non-Deposition)
2/2/2024	Guy Wallace	0.7	\$1,350	\$945	review and analysis of draft Declaration of MTJ re status of document production and ESI; revise and edit same; com's with MTJ re same	Discovery (Non-Deposition)
2/2/2024	Guy Wallace	0.8	\$1,350	\$1,080	zoom with JY; BBK; AX; AS; BU; MTJ; JAU; RLS re preparation of motions to compel and status of meet and confer efforts	Discovery (Non-Deposition)
2/2/2024	Guy Wallace	0.4	\$1,350	\$540	com's with Rutner; Bertino; MTJ; RLS re resident files and meet and confer re same	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/2/2024	Guy Wallace	0.5	\$1,350	\$675	revise and edit Plaintiffs' portion of draft letter re Rule 30(b)(6) designee testimony re transportation; com's with MTJ re same; review and analysis of Defendants' citation to Allred case	Other Motions
2/2/2024	Mark Johnson	0.6	\$1,150	\$690	team Zoom mtg w/ Wallace, Steyer, Xu, Stilber, Umpierre, Spiegel, Bien-Kahn, Edmundson, Yelin re pending motions to compel and status of same, strategy on remaining ones, staffing data, supplementation, 30b6 depositions	Case Organization, Planning and Strategy
2/2/2024	Mark Johnson	1.4	\$1,150	\$1,610	calls w/ G Wallace (x12) re motions to compel, dec iso supplementation mtn, hearing on renewed class cert mtn; strategy for seeking relief for other units; summary judgment strategy on access issues, proof of barriers, inadequacy of answer to complaint re same, expert reports re access, additional inspectors.	Case Organization, Planning and Strategy
2/2/2024	Mark Johnson	1.2	\$1,150	\$1,380	review and analysis of J Bertino email identifying alleged mistakes in P expert findings re missing staffing data; coms w/ Peters, Thornton, Marks, Wallace re same; draft response to Bertino re data and timing of ltr brief re same.	Discovery (Non-Deposition)
2/2/2024	Mark Johnson	0.2	\$1,150	\$230	email exchanges w/ J Bertino re deposition of Rita Stiner, subpoena, timing, duration, location	Discovery (Non-Deposition)
2/2/2024	Mark Johnson	0.1	\$1,150	\$115	email to OC Bertino re complete production of Stiner docs	Discovery (Non-Deposition)
2/2/2024	Mark Johnson	0.2	\$1,150	\$230	com w/ R Bonner re additional stats re document production of supplementation mtn, review same.	Other Motions
2/2/2024	Mark Johnson	2.7	\$1,150	\$3,105	continue working on dec iso mtn to compel supplementation of docs, research for same	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/2/2024	Mark Johnson	0.7	\$1,150	\$805	review and analyze D additional edits to section of joint letter brief to compel additional FSP deposition testimony, com w/ G Wallace re same and distinguishing new authority; make revisions to our section and email to OC re same.	Other Motions
2/2/2024	Mark Johnson	1.8	\$1,150	\$2,070	finalize MTJ dec iso mtn to compel supplementation of docs, pull and format/print exhibits; com w/ OC re same	Other Motions
2/2/2024	Rachel Steyer	0.7	\$750	\$525	weekly meeting with RBGG co-counsel, BSU, GBW, MTJ, TCC, JUB to review and discuss tasks and assignments	Case Organization, Planning and Strategy
2/2/2024	Rachel Steyer	0.4	\$750	\$300	reviewing AX notes re 30b6 depo testimony	Discovery (Non-Deposition)
2/2/2024	Rachel Steyer	0.3	\$750	\$225	reviewing updated MTC 30b6 depo testimony re transportaiton	Discovery (Non-Deposition)
2/2/2024	Rachel Steyer	0.3	\$750	\$225	reviewing and updating MTJ draft declaration ISO MTC supplementation	Discovery (Non-Deposition)
2/2/2024	Rachel Steyer	2.5	\$750	\$1,875	further review and analysis of defendants responses to Plaintiffs' RFA	Discovery (Non-Deposition)
2/2/2024	Travis Close	0.4	\$850	\$340	Review and analyze summary of bowman testimony that was inadequate for purposes of 30(b)(6) deposition	Case Organization, Planning and Strategy
2/2/2024	Travis Close	1.7	\$850	\$1,445	Legal research re: whether leave of court is required to seek further 30(b)(6) depo testimony	Case Organization, Planning and Strategy
2/2/2024	Travis Close	1.5	\$850	\$1,275	Legal research re: equivalent facilitation in context of accessible transportation under DOT regulation	Case Organization, Planning and Strategy
2/2/2024	Travis Close	0.4	\$850	\$340	Revisions to declaration of MTJ in support of motion to compel supplementation of previously produced documentse	Case Organization, Planning and Strategy
2/2/2024	Travis Close	0.5	\$850	\$425	Review and analyze draft motion to compel additional ESI & exhibits	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/2/2024	Travis Close	2.4	\$850	\$2,040	Research on publicly available databases showing injuries to wheelchair users on public transit	Experts (Including Retention)
2/3/2024	Mark Johnson	0.6	\$1,150	\$690	open and review data production from Ds, 3 spreadsheets of assessment data, for date ranges and facilities, lines of data, searches for plaintiffs	Discovery (Non-Deposition)
2/3/2024	Mark Johnson	0.2	\$1,150	\$230	review email from Blake Peters re data analysis, draft response to same.	Experts (Including Retention)
2/3/2024	Mark Johnson	1.2	\$1,150	\$1,380	review, add to and edit letter brief re supplementation of documents to conform to declaration, insert exhibit numbers, shorten	Other Motions
2/3/2024	Mark Johnson	0.1	\$1,150	\$115	email OC Rutner and others re revisions to letter brief on supplementation of document production	Other Motions
2/4/2024	Guy Wallace	1.7	\$1,350	\$2,295	legal research and analysis re individual standing to seek barrier removal regarding other resident units	Misc. Research
2/4/2024	Mark Johnson	0.2	\$1,150	\$230	review and analyze 3 discovery orders from MJ Beeler	Other Motions
2/4/2024	Mark Johnson	0.7	\$1,150	\$805	calls (x4) w/ G Wallace re discovery orders and ramifications of same; planning and issues to discuss w/ opposing counsel during meet and confer.	Other Motions
2/5/2024	Guy Wallace	0.6	\$1,350	\$810	prepare for and participate in meet and confer with Rutner; Bertino; Jacobsen; RLS re resident files; MJ Beeler's Orders of 2/4	Discovery (Non-Deposition)
2/5/2024	Guy Wallace	0.8	\$1,350	\$1,080	com's with MTJ; RLS re results of meet and confer; further issues for meet and confer; approach re MJ Beeler's Order re briefs to be submitted and format of same	Discovery (Non-Deposition)
2/5/2024	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ re further motions to compel	Discovery (Non-Deposition)
2/5/2024	Guy Wallace	0.7	\$1,350	\$945	preparation of list of issues re meet and confer; further motions to compel and revisions to existing draft motions to compel	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/5/2024	Guy Wallace	0.3	\$1,350	\$405	com's with TCC; RLS re further work by Doug Cross; analysis of Defendants' responses to Plaintiffs' RFA's	Discovery (Non-Deposition)
2/5/2024	Guy Wallace	0.4	\$1,350	\$540	review and analysis of MJ Beeler's Standing Order re discovery motions	Other Motions
2/5/2024	Guy Wallace	0.5	\$1,350	\$675	review and analysis of MJ Beeler's Orders of 2/2/24 re motions to compel	Other Motions
2/5/2024	Guy Wallace	0.4	\$1,350	\$540	review and analysis of email from Rutner re proposed motion for clarification; com's with BBK; MTJ re same	Other Motions
2/5/2024	Mark Johnson	0.7	\$1,150	\$805	calls w/ G Wallace (x6) re pending and planned motions to compel, meeting and conferring w/ OC re same; strategies for potential proposals to resolve inspection dispute	Case Organization, Planning and Strategy
2/5/2024	Mark Johnson	0.1	\$1,150	\$115	review and draft response to OC Rutner re proposed mtn to clarify discovery order	Communications With Opposing Counsel
2/5/2024	Mark Johnson	0.7	\$1,150	\$805	zoom call w/ Wallace, Steyer re results of meet and confer w/ OC Rutner, Bertino, Jacobsen re going forward on motions to compel including residents depositions and docs, 30b6 on transportation, supplementation, further meeting and conferring.	Discovery (Non-Deposition)
2/5/2024	Mark Johnson	0.2	\$1,150	\$230	calls w/ G Wallace before meet and confer w Opposing counsel	Discovery (Non-Deposition)
2/5/2024	Mark Johnson	1.7	\$1,150	\$1,955	review exemplar docs related to transportation and fleet safety policy and draft detailed description of topics	Discovery (Non-Deposition)
2/5/2024	Mark Johnson	0.3	\$1,150	\$345	draft email to OC Rutner, Bertino re meeting and conferring, position on 30b6 transportation depo and combining same with Johnson depo; review info re FSP for same	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/5/2024	Mark Johnson	0.2	\$1,150	\$230	review and respond to email from OC Bertino re recent production of data, mtn to compel remaining data	Discovery (Non-Deposition)
2/5/2024	Mark Johnson	0.1	\$1,150	\$115	email exchange w/ Thornton re analysis of recently produced data	Experts (Including Retention)
2/5/2024	Mark Johnson	4.5	\$1,150	\$5,175	work on mtn to compel labor benchmark formula	Other Motions
2/5/2024	Rachel Steyer	0.2	\$750	\$150	attended meet and confer with GBW and opposing counsel to review resident files dispute and other outstanding discovery disputes	Discovery (Non-Deposition)
2/5/2024	Rachel Steyer	0.7	\$750	\$525	zoom with GBW and MTJ to review and discuss outstanding discovery and tasks	Discovery (Non-Deposition)
2/5/2024	Rachel Steyer	0.3	\$750	\$225	reviewing PRA docs circulated by TCC	Discovery (Non-Deposition)
2/5/2024	Rachel Steyer	2.3	\$750	\$1,725	completing review of defendants' RFA responses and objections (extra formatting of spreadsheet)	Discovery (Non-Deposition)
2/5/2024	Rachel Steyer	0.5	\$750	\$375	reviewing documents/search for Michael Johnson in production	Discovery (Non-Deposition)
2/5/2024	Rachel Steyer	0.3	\$750	\$225	email to GBW summarizing RFA analysis	Discovery (Non-Deposition)
2/5/2024	Travis Close	0.5	\$850	\$425	Email to co-counsel list of transit agencies contacted for PRA requests & productions received	Case Organization, Planning and Strategy
2/5/2024	Travis Close	0.6	\$850	\$510	Updates to tracking spreadsheet for transit agency PRA requests	Case Organization, Planning and Strategy
2/5/2024	Travis Close	0.8	\$850	\$680	Review and analyze docs provided by Fairfield & Suisin transit re: policies for wheelchair riding and securement on bus	Case Organization, Planning and Strategy
2/5/2024	Travis Close	1.5	\$850	\$1,275	Send public records act requests for wheelchair boarding & securement policies to: Marin Transit, Napa Valley Transportation Authority, Petaluma Transit, Rio Vista Delta Breeze, SamTrans	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/5/2024	Travis Close	0.8	\$850	\$680	Review and analyze docs provided by Emery Go Round in response to PRA request for wheelchair/securement policies	Discovery (Non-Deposition)
2/5/2024	Travis Close	1.1	\$850	\$935	Draft email to doug cross re: updates on rule 26 schedule, anticipated defense, PRA requests	Experts (Including Retention)
2/6/2024	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re discovery and motions to compel	Discovery (Non-Deposition)
2/6/2024	Guy Wallace	1.4	\$1,350	\$1,890	zoom with JY; BBK; AX; AS; BU; MTJ; JAU; TCC; RLS re preparation for meet and confer with Defendants; motions to compel; potential compromise approaches re ESI	Discovery (Non-Deposition)
2/6/2024	Guy Wallace	0.7	\$1,350	\$945	review and analysis of com's from BBK re documents sought re transportation; MTJ further draft of Rule 30(b)(6) topic re Fleet Safety Policy; revise and edit same	Discovery (Non-Deposition)
2/6/2024	Guy Wallace	0.3	\$1,350	\$405	review and analysis of Defendants' motion for leave for reconsideration	Other Motions
2/6/2024	Jennifer Bybee	1.2	\$925	\$1,110	Zoom call with co-counsel re discovery and meet & confer call tomorrow	Discovery (Non-Deposition)
2/6/2024	Jennifer Bybee	0.1	\$925	\$93	Review Motion to File Leave for Motion for Reconsideration	Other Motions
2/6/2024	Mark Johnson	0.1	\$1,150	\$115	review and respond to OC email re appearance by zoom at hearing on mtn to compel	Communications With Opposing Counsel
2/6/2024	Mark Johnson	0.2	\$1,150	\$230	review and draft response to OC Rutner re agenda for discovery meet and confer	Communications With Opposing Counsel
2/6/2024	Mark Johnson	1.5	\$1,150	\$1,725	Zoom video team call w/ Wallace, Xu, Yelin, Bien-Kahn, Spiegel, Seyer, Bybee, Close, Umpierre, Edmunson re outstanding and planed motions to compel, meet and confer strategy re same for video call with OC	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/6/2024	Mark Johnson	0.4	\$1,150	\$460	review expert analysis of recent data production from Defendants for staffing analysis	Discovery (Non-Deposition)
2/6/2024	Mark Johnson	0.1	\$1,150	\$115	draft email to OC Bertino re analysis of latest data production.	Discovery (Non-Deposition)
2/6/2024	Mark Johnson	0.1	\$1,150	\$115	review Wallace edits to proposed description of 30b6 transportation topics.	Discovery (Non-Deposition)
2/6/2024	Mark Johnson	0.2	\$1,150	\$230	review D mtn for leave to file mtn for reconsideration	Other Motions
2/6/2024	Mark Johnson	3.0	\$1,150	\$3,450	work on mtn to compel benchmark formula and declaration iso of same	Other Motions
2/6/2024	Mark Johnson	3.0	\$1,150	\$3,450	work on mtn to compel benchmarks and review, compiling of exhibits; research additional cases re proportionality, burden	Other Motions
2/6/2024	Rachel Steyer	1.5	\$750	\$1,125	meeting with RBGG co-counsel, BSU, GBW, MTJ, TCC to review and discuss outstanding discovery items in prep for meet and confer	Case Organization, Planning and Strategy
2/6/2024	Rachel Steyer	0.3	\$750	\$225	reviewing highlighted portions of Kelly Rubin depo transcript circulated by TCC	Depositions
2/6/2024	Rachel Steyer	5.4	\$750	\$4,050	ongoing review and updating discovery index	Discovery (Non-Deposition)
2/6/2024	Travis Close	0.8	\$850	\$680	Revisions to draft regulatory analysis to Doug Cross & email	Case Organization, Planning and Strategy
2/6/2024	Travis Close	0.4	\$850	\$340	Review and analyze Def's motion for reconsideration re: 30(b)(6) depositions	Case Organization, Planning and Strategy
2/6/2024	Travis Close	1.5	\$850	\$1,275	Meeting with GBW, MTJ, RLS, and co-counsel re: tomorrow's meet/confer, joint letter briefs, depositions, and inspections	Case Organization, Planning and Strategy
2/6/2024	Travis Close	0.2	\$850	\$170	Email to team & co-counsel re: 2018 depo of kelly rubin	Case Organization, Planning and Strategy
2/6/2024	Travis Close	0.5	\$850	\$425	Analyze testimony in Kelly Rubin depo from 2018 re: service alignment and staffing platform at Brookdale	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/6/2024	Travis Close	0.5	\$850	\$425	Review, analyze, and propose revisions to draft 30b6 transportation topic for further deposition	Discovery (Non-Deposition)
2/6/2024	Travis Close	1.7	\$850	\$1,445	Review and analyze compendium of transportation-related documents for additional docs to include in 30b6 depo	Discovery (Non-Deposition)
2/6/2024	Travis Close	0.8	\$850	\$680	Review and analyze recently issued facility evaluation and complaint investigation reports for South Tarzana, Santa Monica, Nohl Ranch, Folsom, Tracy, Redwood City, San Jose, Chanate facilities	Discovery (Non-Deposition)
2/6/2024	Travis Close	0.7	\$850	\$595	Review and analyze wheelchair boarding & securement policies produced by Emery Go Round	Discovery (Non-Deposition)
2/7/2024	Guy Wallace	1.6	\$1,350	\$2,160	zoom with ER; Bertino; Jacobsen; Launey; BBK; AX; MTJ; TCC re discovery issues; motion re subclasses and schedule re same	Discovery (Non-Deposition)
2/7/2024	Guy Wallace	0.9	\$1,350	\$1,215	zoom with GG; JY; BBK; AX; BU; MTJ; JAU; TCC; RLS re preparation of motion re subclasses; discovery; motions to compel	Discovery (Non-Deposition)
2/7/2024	Guy Wallace	0.6	\$1,350	\$810	review and analysis of Order re Plaintiffs' motion for leave re subclasses	Other Motions
2/7/2024	Guy Wallace	0.5	\$1,350	\$675	com's with Waters re preparation of declaration re motion for leave re access subclasses	Other Motions
2/7/2024	Guy Wallace	0.1	\$1,350	\$135	com's with Mastin re declaration for motion re access subclasses	Other Motions
2/7/2024	Guy Wallace	2.3	\$1,350	\$3,105	preparation of argument and further points re motion for disability access subclasses	Other Motions
2/7/2024	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ re motion re access subclasses; discovery issues; motions to compel	Other Motions
2/7/2024	Guy Wallace	2.2	\$1,350	\$2,970	revise and edit draft of MTC re benchmark formula and documents re same; com's with MTJ; BU re same	Other Motions
2/7/2024	Jennifer Bybee	0.2	\$925	\$185	Review Order re Subclasses & Motions to Strike	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/7/2024	Jennifer Bybee	0.2	\$925	\$185	Review emails with co-counsel re Motion for Subclasses	Class Certification
2/7/2024	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re revising access expert declarations	Class Certification
2/7/2024	Jennifer Bybee	0.5	\$925	\$463	Create redline draft of Mastin Decl. iso Motion to Certify Subclasses	Class Certification
2/7/2024	Jennifer Bybee	0.7	\$925	\$648	Zoom call with co-counsel re motion for certification of subclasses and discovery	Class Certification
2/7/2024	Mark Johnson	0.6	\$1,150	\$690	call w/ G Wallace re follow up to meet and confer w/ OC, inspection timing and case schedule, arguments on class cert of 6 access caeses	Case Organization, Planning and Strategy
2/7/2024	Mark Johnson	1.2	\$1,150	\$1,380	zoom call with COC Wallace, Steyer, Close, Bybee, Edmundson, Umpierre, Grunfeld, re discovery, motions to compel, filing subclass motion.	Case Organization, Planning and Strategy
2/7/2024	Mark Johnson	1.2	\$1,150	\$1,380	meet and confer re multiple discovery issues and motions w/ OC Rutner, Bertino, Launey, Jacobsen and COC Wallace, Xu, Close, Bien-Kahn	Communications With Opposing Counsel
2/7/2024	Mark Johnson	7.5	\$1,150	\$8,625	continue working on drafting mtn to compel benchmark formula, dec iso of mtn, gathering and reviewing exhibits, integrate edits from Wallace, Umpierre, coms re same w/ COC	Other Motions
2/7/2024	Rachel Steyer	0.2	\$750	\$150	reviewing TCC notes from meet and confer with OC	Discovery (Non-Deposition)
2/7/2024	Rachel Steyer	0.2	\$750	\$150	email to GBW, MTJ, TCC re analysis of declarants (breakdown of staffing vs. disability)	Discovery (Non-Deposition)
2/7/2024	Rachel Steyer	1.8	\$750	\$1,350	reviewing Michael Johnson ESI	Discovery (Non-Deposition)
2/7/2024	Rachel Steyer	1.7	\$750	\$1,275	revising draft RLS declaration for motion for certification of subclasses	Other Motions
2/7/2024	Rachel Steyer	0.3	\$750	\$225	reading and reviewing court order re motion for leave for subclasses	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/7/2024	Rachel Steyer	1.2	\$750	\$900	zoom with RBGG co-counsel, BSU, GBW, MTJ, TCC to review and discuss prep for motion filing and outstanding discover	Other Motions
2/7/2024	Rachel Steyer	0.2	\$750	\$150	finalizing RLS declaration, transmitting to RBGG co-counsel, BSU, GBW, MTJ, TCC, JUB	Other Motions
2/7/2024	Rachel Steyer	0.2	\$750	\$150	reviewing JSY edits to GBW declaration	Other Motions
2/7/2024	Travis Close	0.3	\$850	\$255	Review and analyze court's order granting in part, denying in part, motion for leave to certify subclasses	Case Organization, Planning and Strategy
2/7/2024	Travis Close	0.9	\$850	\$765	Legal research re: connection with Rule 56(e) and attorney fact-based declarations, as indicated in local rules	Case Organization, Planning and Strategy
2/7/2024	Travis Close	0.4	\$850	\$340	Review, analyze, and propose revisions to RLS declaration iso motion to certify subclasses	Case Organization, Planning and Strategy
2/7/2024	Travis Close	1.3	\$850	\$1,105	meeting with team & co-counsel re: motion to certify subclasses	Case Organization, Planning and Strategy
2/7/2024	Travis Close	0.4	\$850	\$340	Review and analyze revised declaration of RLS & supporting class member declarations in support of motion to certify subclasses	Class Certification
2/7/2024	Travis Close	0.3	\$850	\$255	Email to team re: preparing for today's m/c with defendants	Communications With Opposing Counsel
2/7/2024	Travis Close	1.6	\$850	\$1,360	Meet and confer call with defendants re: range of discovery topics, depositions, inspections, etc.	Communications With Opposing Counsel
2/7/2024	Travis Close	0.3	\$850	\$255	Finalize notes from today's call & send to defendants	Communications With Opposing Counsel
2/7/2024	Travis Close	0.6	\$850	\$510	Review and analyze transit accessibility policies for Vacaville City Coach	Discovery (Non-Deposition)
2/7/2024	Travis Close	1.1	\$850	\$935	Draft PRA requests & send to SFMTA, Sonoma County Transit, Solano County Transit, and Union City transit re: wheelchair boarding & securement policies	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/7/2024	Travis Close	0.5	\$850	\$425	Analyze the declarations of plaintiffs' architectural experts in support of motion to leave, to determine revisions necessary for next cert motion	Pleadings and Motions Re: Pleadings
2/8/2024	Guy Wallace	0.5	\$1,350	\$675	com's with Mastin re declaration re motion for access subclasses	Experts (Including Retention)
2/8/2024	Guy Wallace	2.2	\$1,350	\$2,970	preparation of motion for access subclasses	Other Motions
2/8/2024	Guy Wallace	0.9	\$1,350	\$1,215	com's with Waters re declaration re access subclasses; review and analysis of same	Other Motions
2/8/2024	Guy Wallace	0.4	\$1,350	\$540	com's with Mastin re declaration re access subclasses; review and analysis of same; com's with Waters re same	Other Motions
2/8/2024	Guy Wallace	0.4	\$1,350	\$540	com's with RLS re potential class representatives; Miguel Mendoza	Other Motions
2/8/2024	Guy Wallace	0.7	\$1,350	\$945	com's with BU re draft of declaration of Kennedy re access subclasses; review and analysis of same	Other Motions
2/8/2024	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of declaration of GBW re access subclasses	Other Motions
2/8/2024	Guy Wallace	0.5	\$1,350	\$675	zoom with GG; JY; BBK; AX; DE; MTJ; TCC re preparation of motion re formula re benchmarks; motion re access subclasses	Other Motions
2/8/2024	Guy Wallace	0.7	\$1,350	\$945	legal research and analysis re Ninth Circuit decision in Davis v. Laboratory Corp.; recent decisions re legal standard for commonality	Other Motions
2/8/2024	Guy Wallace	4.9	\$1,350	\$6,615	preparation and drafting of motion for access subclasses; com's with AX re same (.3)	Other Motions
2/8/2024	Mark Johnson	0.5	\$1,150	\$575	team call with co-counsel, Wallace, Xu, Bien-Kahn, Stilber, Close, others re status of tasks for filing mtn for certification of subclasses, mtn to compel production of benchmark source code	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/8/2024	Mark Johnson	0.3	\$1,150	\$345	call w/ B Umpierre re Schroyer declaration; review same for mtn to compel production of source code for benchmark formula	Other Motions
2/8/2024	Mark Johnson	9.0	\$1,150	\$10,350	continued and final work on mtn to compel benchmark formula and declaration iso mtn; redactions, filling in citations, coms w/ COC re sealing, filing	Other Motions
2/8/2024	Rachel Steyer	1.5	\$750	\$1,125	conducting edit and proofread of MTJ MTC benchmark formula	Other Motions
2/8/2024	Rachel Steyer	1.2	\$750	\$900	proofreading and editing MTJ decl. ISO MTC benchmark formula/discovery	Other Motions
2/8/2024	Rachel Steyer	0.2	\$750	\$150	reviewing proposed order granting subclasses for motion	Other Motions
2/8/2024	Rachel Steyer	0.8	\$750	\$600	reviewing and double checking declaration exhibit citations in MTJ MTC benchmark data brief	Other Motions
2/8/2024	Rachel Steyer	0.4	\$750	\$300	legal research for MTJ for waiver discovery objection authority for MTC brief	Other Motions
2/8/2024	Rachel Steyer	1.1	\$750	\$825	call with Miguel Mendoza to review and discuss possibility of him serving as name plaintiff	Other Motions
2/8/2024	Travis Close	0.3	\$850	\$255	Review and analyze revised joint letter brief re: further responses on interrogatories	Case Organization, Planning and Strategy
2/8/2024	Travis Close	0.6	\$850	\$510	Review and analyze wallace declaration iso motion for cert of subclasses for consistency with motion	Case Organization, Planning and Strategy
2/8/2024	Travis Close	0.4	\$850	\$340	Review and analyze judge beeler's prior orders re: content and form of discovery letter briefs	Case Organization, Planning and Strategy
2/8/2024	Travis Close	1.5	\$850	\$1,275	Legal research re: whether law of the case bars a district court from reconsidering its own prior decisions	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/8/2024	Travis Close	1.4	\$850	\$1,190	Review and analyze DSS complaint investigation reports archived from facilities for info re: transportation and Strategy issues	Case Organization, Planning and Strategy
2/8/2024	Travis Close	0.4	\$850	\$340	Review and analyze standing orders re: discovery briefing of magistrate judge beeler & northern district of california	Discovery (Non-Deposition)
2/8/2024	Travis Close	2.3	\$850	\$1,955	Draft stipulation and order re: full length briefing on ESI and document supplementation	Other Motions
2/8/2024	Travis Close	0.6	\$850	\$510	Review, analyze, & revise draft proposed order granting motion to certify subclasses; compare class definitions to those in court's order	Pleadings and Motions Re: Pleadings
2/9/2024	Guy Wallace	0.3	\$1,350	\$405	com's with Mastin re declaration in support of motion to certify access subclasses; review and analysis of draft of same	Experts (Including Retention)
2/9/2024	Guy Wallace	0.9	\$1,350	\$1,215	com's with Waters re declaration re access subclasses	Experts (Including Retention)
2/9/2024	Guy Wallace	0.5	\$1,350	\$675	com's with Mastin re declaration re access subclasses	Experts (Including Retention)
2/9/2024	Guy Wallace	5.2	\$1,350	\$7,020	preparation and drafting of motion for certification of access subclasses	Other Motions
2/9/2024	Guy Wallace	3.8	\$1,350	\$5,130	review and analysis of draft declarations of Waters and Mastin re motion for access subclasses; revise and edit same; com's with Waters; Mastin; MTJ; JAU re same (1.5)	Other Motions
2/9/2024	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ; JAU re preparation of declarations of Waters; Mastin re motion for access subclasses	Other Motions
2/9/2024	Guy Wallace	2.1	\$1,350	\$2,835	review and analysis of drafts of Waters declaration re access subclasses	Other Motions
2/9/2024	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of draft declarations from Mastin re motion for access subclasses	Other Motions
2/9/2024	Guy Wallace	1.5	\$1,350	\$2,025	review and analysis of draft declarations of PK; com's with PK; LP; BU re same	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/9/2024	Jennifer Bybee	0.6	\$925	\$555	Draft paragraph re visual impairments	Class Certification
2/9/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re Waters Declaration	Class Certification
2/9/2024	Jennifer Bybee	0.1	\$925	\$93	Review email com's re Waters Decl.	Class Certification
2/9/2024	Jennifer Bybee	4.2	\$925	\$3,885	Edit and update G. Waters Declaration	Class Certification
2/9/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with G. Waters re resident rooms	Class Certification
2/9/2024	Jennifer Bybee	0.2	\$925	\$185	Review com's with co-counsel re documents for filing	Class Certification
2/9/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re Waters Decl	Class Certification
2/9/2024	Jennifer Bybee	0.1	\$925	\$93	Review comments in Waters Decl	Class Certification
2/9/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW, MTJ, G. Waters re Waters Decl.	Class Certification
2/9/2024	Jennifer Bybee	0.8	\$925	\$740	Final review of Waters Decl.	Class Certification
2/9/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re Waters Decl.	Class Certification
2/9/2024	Mark Johnson	0.5	\$1,150	\$575	coms w/ R Bonner re devising search terms, draft sample search protocol re transportation	Discovery (Non-Deposition)
2/9/2024	Mark Johnson	1.0	\$1,150	\$1,150	review and propose edits to brief iso mtn to certify access sub classes	Other Motions
2/9/2024	Mark Johnson	0.5	\$1,150	\$575	review dec of G Wallace iso mtn to certify access subclasses, com w/ COC re same	Other Motions
2/9/2024	Mark Johnson	1.5	\$1,150	\$1,725	review new sections of G Waters declaration iso mtn to certify access subclasses; coms w/ G Wallace and J Bybee re problems w/ same	Other Motions
2/9/2024	Mark Johnson	1.8	\$1,150	\$2,070	review and propose edits to Mastin dec iso mtn to certify access subclasses, including new sections summarizing report findings,	Other Motions
2/9/2024	Mark Johnson	0.4	\$1,150	\$460	coms w Mastin, Bybee, Wallace re proposed edits to Mastin declaration and questions re same	Other Motions
2/9/2024	Mark Johnson	0.6	\$1,150	\$690	zoom mtg w/ Wallace, Bien-Kahn, Yellin, Adrienne, Edmundson, Yellin, Close, Xu re status of brief and supporting papers for mtn to certify access subclasses; remaining tasks	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/9/2024	Mark Johnson	0.8	\$1,150	\$920	further edits to Mastin declaration iso mtn to certify subclasses, coms w/ him re same and finalization of dec.	Other Motions
2/9/2024	Mark Johnson	1.8	\$1,150	\$2,070	review and compare draft Waters dec iso mtn to certify access subclasses to reports and email paragraphs from Waters; draft emails to Waters, Bybee, Wallace re findings	Other Motions
2/9/2024	Mark Johnson	1.1	\$1,150	\$1,265	calls w/ G Wallace (x 8) w/ Wallace and Mastin declarations iso mtn to certify access subclasses, brief, status of other elements of filing, legal issues re common proof	Other Motions
2/9/2024	Travis Close	1.3	\$850	\$1,105	Review, analyze, and propose revisions to MPA iso motion for certification of subclasses	Case Organization, Planning and Strategy
2/10/2024	Guy Wallace	2.2	\$1,350	\$2,970	legal research and analysis re certification of (b)(3) classes involving potential large statutory damages claims; superiority; Cal. Civ. Code section 55.56	Class Certification
2/12/2024	Guy Wallace	0.8	\$1,350	\$1,080	team zoom with GG; JY; BBK; BU; MTJ re preparation for 2/13 CMC	Case Management Conferences
2/12/2024	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ re discovery disputes re transportation documents and ESI; MTC re supplemental and ESI re all claims	Discovery (Non-Deposition)
2/12/2024	Guy Wallace	0.5	\$1,350	\$675	revise and edit draft letter to Defendants re proposed Rule 30(b)(6) deposition of Michael Johnson	Discovery (Non-Deposition)
2/12/2024	Guy Wallace	0.5	\$1,350	\$675	legal research and analysis re statutory damages claims and issues re predominance and superiority	Misc. Research
2/12/2024	Guy Wallace	0.5	\$1,350	\$675	revise and edit draft stipulation and order re MTC re supplementation and ESI; com's with MTJ; TCC re same	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/12/2024	Mark Johnson	0.8	\$1,150	\$920	zoom call w/ Yelin, Grunfeld, Wallace, Bien-Kahn Umpierre re case schedule and strategy for addressing issues at CMC	Case Organization, Planning and Strategy
2/12/2024	Mark Johnson	0.8	\$1,150	\$920	calls w G Wallace (x6) re CMC strategy, mtn to compel supplementation of documents, stipulation for mtn instead of letter brief, site inspections, case schedule, ltr re 30b6 depo and docs/ESI	Case Organization, Planning and Strategy
2/12/2024	Mark Johnson	0.2	\$1,150	\$230	review info re Fountaingrove and Hemet period of Brookdale operation; email to G Wallace re same.	Case Organization, Planning and Strategy
2/12/2024	Mark Johnson	3.7	\$1,150	\$4,255	draft ltr to OC re transportation 30b6 depo description, ESI custodians and search parameters re same; review of docs related to FSP and transportation for depo topic description; develop list of custodians and search terms	Discovery (Non-Deposition)
2/12/2024	Mark Johnson	0.5	\$1,150	\$575	coms w/ B Bien-Kahn and Wallace re proposed addition to letter re 30b6 depo on transportation / FSP and ESI to add categories of documents; incorporate edits and add other edits.	Discovery (Non-Deposition)
2/12/2024	Mark Johnson	0.7	\$1,150	\$805	review and revise proposed stip re mtn to supplement document production	Discovery (Non-Deposition)
2/12/2024	Mark Johnson	0.3	\$1,150	\$345	email coms w/ L Castro, R Steyer, R Bonner re preparing witness prep folder	Trial and Pretrial Preparation
2/12/2024	Rachel Steyer	0.5	\$750	\$375	call with Wendy DeMello to review and provide case status update	Class Outreach and Contact
2/12/2024	Rachel Steyer	0.2	\$750	\$150	reviewing draft MTJ letter to OC re FSP depo and docs/ESI	Communications With Opposing Counsel
2/12/2024	Rachel Steyer	0.2	\$750	\$150	reviewing defendants portion of letter brief re interrogatories	Discovery (Non-Deposition)
2/12/2024	Rachel Steyer	3.0	\$750	\$2,250	reviewing ESI for Michael Johnson	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/12/2024	Rachel Steyer	0.2	\$750	\$150	reviewing internal communications with RBGG co-counsel for finalizing brief for subclasses	Other Motions
2/12/2024	Travis Close	1.3	\$850	\$1,105	Legal research on damages available to assisted living facility residents under the Unruh Act	Case Organization, Planning and Strategy
2/12/2024	Travis Close	0.3	\$850	\$255	Emails to GBW re: damages available under Unruh Act and earlier memo on same	Case Organization, Planning and Strategy
2/12/2024	Travis Close	0.2	\$850	\$170	Review and analyze updated stip and order re: full-length briefing on ESI dispute	Case Organization, Planning and Strategy
2/12/2024	Travis Close	0.3	\$850	\$255	Review, analyze, and propose revisions for draft notice of deposition on 30b6 - fleet safety policy	Case Organization, Planning and Strategy
2/12/2024	Travis Close	0.2	\$850	\$170	Email to MTJ re: Q'Straint securement procedures policy	Case Organization, Planning and Strategy
2/12/2024	Travis Close	0.2	\$850	\$170	Email to AXU (co-counsel) re: Unruh Act damages available for plaintiffs	Case Organization, Planning and Strategy
2/13/2024	Guy Wallace	1.3	\$1,350	\$1,755	prepare for CMC re schedule on motion for subclasses	Case Management Conferences
2/13/2024	Guy Wallace	0.6	\$1,350	\$810	CMC with Judge Gilliam re access subclasses	Case Management Conferences
2/13/2024	Guy Wallace	0.7	\$1,350	\$945	com's with GG; BBK; MTJ re results of CMC with Judge Gilliam re schedule on motion to certify access subclasses	Case Management Conferences
2/13/2024	Guy Wallace	0.5	\$1,350	\$675	review and analysis of Order on schedule re briefing for access subclasses; com's with GG and MTJ re same	Case Management Conferences
2/13/2024	Guy Wallace	0.5	\$1,350	\$675	analysis of potential issues for reply on motion to certify access subclasses	Class Certification
2/13/2024	Mark Johnson	0.7	\$1,150	\$805	CMC re briefing schedule on mtn to certify subclasses	Case Management Conferences

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/13/2024	Mark Johnson	1.0	\$1,150	\$1,150	draft talking points for G Wallace for CMC re briefing schedule on class cert mtn on subclasses and related issues.	Case Management Conferences
2/13/2024	Mark Johnson	0.8	\$1,150	\$920	post CMC conference w/ Grunfeld, Bien-Kahn and Wallace re implications of briefing schedule on class motion, then with Wallace re same	Case Organization, Planning and Strategy
2/13/2024	Mark Johnson	0.2	\$1,150	\$230	com w/ S Stiner re class cert mtn for subclasses, briefing schedule, inspections, trial date	Class Certification
2/13/2024	Mark Johnson	0.5	\$1,150	\$575	review pleadings to check representations by counsel at CMC	Class Certification
2/13/2024	Mark Johnson	2.4	\$1,150	\$2,760	review D privilege log and photos produced by D experts; draft memo to COC re same	Discovery (Non-Deposition)
2/13/2024	Mark Johnson	0.1	\$1,150	\$115	email exchange w/ Rutner re proposed topics and docs for Rule 30(b)(6) depo	Discovery (Non-Deposition)
2/13/2024	Mark Johnson	0.2	\$1,150	\$230	email exchange w/ access experts re order re inspections.	Experts (Including Retention)
2/13/2024	Mark Johnson	0.3	\$1,150	\$345	review edits to proposed stip from OC re filing mtn for supplementation of doc production, ESI, com w G Wallace re same	Other Motions
2/13/2024	Travis Close	1.8	\$850	\$1,530	Review and analyze def's filings for info on emergency planning procedures for Kailes Rule 26 report	Case Organization, Planning and Strategy
2/13/2024	Travis Close	0.1	\$850	\$85	Review and analyze court's order resetting briefing schedule on class cert motion	Case Organization, Planning and Strategy
2/13/2024	Travis Close	1.4	\$850	\$1,190	Research damages available plaintiffs under Elder Abuse statute and CLRA	Case Organization, Planning and Strategy
2/13/2024	Travis Close	1.9	\$850	\$1,615	Review and analyze facility evacuation and complaint investigation reports at plaintiff facilities for info on emergency planning-related violations	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/14/2024	Guy Wallace	1.5	\$1,350	\$2,025	legal research and analysis re predominance standard and arguments re certification of (b)(3) classes re six facilities	Class Certification
2/14/2024	Guy Wallace	0.5	\$1,350	\$675	com's with AX; MTJ re meet and confer issues with Defendants	Discovery (Non-Deposition)
2/14/2024	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of BBK hearing notes; legal research and analysis re adverse impact and transportation claims; com's with BBK and MTJ re additional points re same	Other Motions
2/14/2024	Guy Wallace	0.2	\$1,350	\$270	review and analysis of Order from MJ Beeler re ECF No.'s 704 and 738	Other Motions
2/14/2024	Mark Johnson	0.3	\$1,150	\$345	email exchange w/ A Xu re strategy for deposition scheduling and coordinating with necessary document production.	Case Organization, Planning and Strategy
2/14/2024	Mark Johnson	0.4	\$1,150	\$460	email to R Bonner, J Maher re project involving analysis of D access expert photos and comparisons to P expert barrier descriptions for 4 facilities.	Case Organization, Planning and Strategy
2/14/2024	Mark Johnson	0.2	\$1,150	\$230	emails w/ J Thornton and follow up w/ J Bertino re status staffing data review.	Discovery (Non-Deposition)
2/14/2024	Mark Johnson	0.2	\$1,150	\$230	review e-memo from J Maher re reluctance to care docs, respond re same and re update of project status	Discovery (Non-Deposition)
2/14/2024	Mark Johnson	0.2	\$1,150	\$230	coms w/ R Steyer re production of declarant files and depos	Discovery (Non-Deposition)
2/14/2024	Mark Johnson	0.1	\$1,150	\$115	emails w/ J Yelin re deadline for reply iso class certification; stip re same	Other Motions
2/14/2024	Mark Johnson	0.2	\$1,150	\$230	review revisions to A Xu reply portion of briefing on interrogatory dispute, meeting and conferring re same.	Other Motions
2/14/2024	Mark Johnson	0.1	\$1,150	\$115	follow up email to OC re stip for full briefing on mtc supplemental docs	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/14/2024	Mark Johnson	0.2	\$1,150	\$230	call w/ B Bien-Kahn re prep and strategy for hearing on mtn to compel class member contact information.	Other Motions
2/14/2024	Mark Johnson	0.7	\$1,150	\$805	review B Bien-Kahn outline for argument on MTC class member contact information. send comments and additional points re same.	Other Motions
2/14/2024	Mark Johnson	0.7	\$1,150	\$805	begin drafting noticed motion re supplementation of documents	Other Motions
2/14/2024	Rachel Steyer	5.6	\$750	\$4,200	ongoing review of 30b6 Johnson documents	Discovery (Non-Deposition)
2/14/2024	Rachel Steyer	0.2	\$750	\$150	response to MTJ, GBW, TCC re status of resident declarant files	Discovery (Non-Deposition)
2/14/2024	Travis Close	0.2	\$850	\$170	Review and analyze def's revisions to draft stipulation re: full briefing on ESI and supplementation motions to compel	Case Organization, Planning and Strategy
2/14/2024	Travis Close	0.4	\$850	\$340	Review and analyze revised draft joint letter brief re: additional interrogatories	Discovery (Non-Deposition)
2/15/2024	Guy Wallace	0.9	\$1,350	\$1,215	legal research and analysis re predominance; issues re individual entitlement to or eligibility for damages do not defeat predominance	Class Certification
2/15/2024	Guy Wallace	0.6	\$1,350	\$810	review and analysis of MJ Beeler Order dated February 14; com's with BBK; AX; MTJ re same	Discovery (Non-Deposition)
2/15/2024	Guy Wallace	1.2	\$1,350	\$1,620	zoom meet and confer with ER; JB; MJ; MTJ; AX; re pending discovery issues and potential compromise resolutions	Discovery (Non-Deposition)
2/15/2024	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re results of meet and confer with Defendants	Discovery (Non-Deposition)
2/15/2024	Mark Johnson	0.2	\$1,150	\$230	call w G Wallace re recap of meet and confer, next steps.	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/15/2024	Mark Johnson	1.4	\$1,150	\$1,610	meet and confer video conference re multiple discovery issues w/ Rutner, Jacobsen, Bertino and Wallace, Bien-Kahn and Xu - including depositions, inspections, supplemental document production, etc.	Discovery (Non-Deposition)
2/15/2024	Mark Johnson	0.4	\$1,150	\$460	zoom team call with B Bien Kahn, A Xu, G Wallace to plan for and discuss agenda for meet and confer w/ OC re impact of recent order and outstanding discovery issues.	Discovery (Non-Deposition)
2/15/2024	Mark Johnson	0.2	\$1,150	\$230	email exchanges w OC re meeting and conferring on discovery items, agenda for same	Discovery (Non-Deposition)
2/15/2024	Rachel Steyer	0.3	\$750	\$225	reviewing AX memo from meet and confer	Discovery (Non-Deposition)
2/15/2024	Travis Close	0.5	\$850	\$425	Meet with team to discuss impact of Judge beeler's order last night	Case Organization, Planning and Strategy
2/15/2024	Travis Close	0.3	\$850	\$255	Email to AXU (co-counsel) re: analysis of docs for Dimple Kamdar	Case Organization, Planning and Strategy
2/15/2024	Travis Close	0.2	\$850	\$170	Email to LEC re: assignment for downloading & organizing emails from Dimple Kamdar	Case Organization, Planning and Strategy
2/15/2024	Travis Close	0.2	\$850	\$170	Email to MTJ re: thoughts on further strategy after today's M/C call with defendants	Case Organization, Planning and Strategy
2/15/2024	Travis Close	1.1	\$850	\$935	Depo prep -- review and analyze documents associated with Beena Kumar produced by Defendants	Depositions
2/15/2024	Travis Close	1.4	\$850	\$1,190	Meet/confer with defendants to discuss outstanding discovery disputes, inspections, depositions, etc.	Discovery (Non-Deposition)
2/15/2024	Travis Close	1.7	\$850	\$1,445	Depo prep -- review and analyze emails associated with Dimple Kamdar that defendants have produced	Discovery (Non-Deposition)
2/16/2024	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ re discovery issues; response and potential compromises re MTC re interrogatories	Discovery (Non-Deposition)
2/16/2024	Guy Wallace	0.2	\$1,350	\$270	com's with BU re staffing data and preparation of analyses re six facilities	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/16/2024	Guy Wallace	0.9	\$1,350	\$1,215	com's with GG; JY; AX; BU; MTJ; TCC; RLS re discovery motions and supplementation of discovery responses re named Plaintiffs who are current residents of Brookdale; Rule 26(e) supplementation	Other Motions
2/16/2024	Guy Wallace	0.4	\$1,350	\$540	review and analysis of Defendants' motion for leave to file motion for reconsideration re MJ Beeler Order re depositions	Other Motions
2/16/2024	Mark Johnson	0.4	\$1,150	\$460	prepare internal agenda / list of motions for discussion of team call	Case Organization, Planning and Strategy
2/16/2024	Mark Johnson	0.6	\$1,150	\$690	review emails from A Xu and Wallace re proposed compromise from Ds on rog responses, prepare and send analysis of same to G Wallace.	Discovery (Non-Deposition)
2/16/2024	Mark Johnson	0.8	\$1,150	\$920	team zoom call w/ Wallace, Grunfeld, Xu, Yelin, Close re pending discovery motions, follow up from meet and confer session with opposing counsel of 2/15	Discovery (Non-Deposition)
2/16/2024	Mark Johnson	0.7	\$1,150	\$805	Teams call w/ R Bonner and James Maher re analysis of D's expert photos and privilege log and charting same against P's expert reports.	Discovery (Non-Deposition)
2/16/2024	Mark Johnson	0.2	\$1,150	\$230	call from G Wallace re proposed compromise on interrogatories	Discovery (Non-Deposition)
2/16/2024	Mark Johnson	0.5	\$1,150	\$575	call from G Wallace re motions to compel and letter brief, follow up on meet and confer	Discovery (Non-Deposition)
2/16/2024	Mark Johnson	0.2	\$1,150	\$230	call from G Wallace re further discovery and discovery motion issues. and renewed mtn for reconsideration	Discovery (Non-Deposition)
2/16/2024	Mark Johnson	0.2	\$1,150	\$230	call from G Wallace re D follow up letter on discovery issues and proposed response.	Discovery (Non-Deposition)
2/16/2024	Mark Johnson	0.1	\$1,150	\$115	email exchange w/ R Bonner re status of project analyzing D and P expert photos of facilities	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/16/2024	Mark Johnson	0.5	\$1,150	\$575	review D privilege log for discussion w/ R Bonner, J Maher re expert photo analysis project.	Discovery (Non-Deposition)
2/16/2024	Mark Johnson	0.3	\$1,150	\$345	review proposed email to OC from AX and respond with comments, alternative approach	Discovery (Non-Deposition)
2/16/2024	Mark Johnson	0.2	\$1,150	\$230	draft email to OC Rutner re status of production of remaining docs responsive to RFP sets 9 and 10, production of Evacuation Plans	Discovery (Non-Deposition)
2/16/2024	Mark Johnson	0.3	\$1,150	\$345	review and analysis of Ds renewed mtn for reconsideration of discovery order.	Other Motions
2/16/2024	Mark Johnson	3.6	\$1,150	\$4,140	work on revised version of ltr brief re supplementation of doc production and dec iso of same.	Other Motions
2/16/2024	Rachel Steyer	0.9	\$750	\$675	weekly meeting with RBGG, BSU, GBW, MTJ, TCC to review and discuss outstanding tasks and assignments	Case Organization, Planning and Strategy
2/16/2024	Rachel Steyer	0.4	\$750	\$300	call with Wendy DeMello to provide case status update	Class Outreach and Contact
2/16/2024	Rachel Steyer	5.4	\$750	\$4,050	ongoing review of ED/HWD doc production	Discovery (Non-Deposition)
2/16/2024	Rachel Steyer	0.2	\$750	\$150	reviewing letter from OC stating position on outstanding discovery and draft stipulation	Discovery (Non-Deposition)
2/16/2024	Travis Close	1.4	\$850	\$1,190	Review and analyze documents produced by SC Valley Transportation Authority re: wheelchair device boarding and securement	Case Organization, Planning and Strategy
2/16/2024	Travis Close	0.8	\$850	\$680	Team meeting with co-counsel re: discovery motions, expert reports, and trial planning	Case Organization, Planning and Strategy
2/16/2024	Travis Close	1.8	\$850	\$1,530	Analyze production of supplemental emergency evacuation plans & evaluate plans still missing from the six facilities	Case Organization, Planning and Strategy
2/16/2024	Travis Close	0.3	\$850	\$255	Email to MTJ re analysis of emergency evacuation plans at six facilities & missing plans	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/16/2024	Travis Close	0.9	\$850	\$765	Analyze defendants' latest productions of docs to compare to claims in recent correspondence re: supplementation	Discovery (Non-Deposition)
2/16/2024	Travis Close	0.3	\$850	\$255	Review and analyze defendants' motion for leave to file motion for reconsideration	Pleadings and Motions Re: Pleadings
2/17/2024	Guy Wallace	1.1	\$1,350	\$1,485	legal research and analysis re predominance requirement and issues re common liability and the balance against entitlement to or calculation of individual damages	Class Certification
2/18/2024	Guy Wallace	1.2	\$1,350	\$1,620	legal research and analysis re (b)(3) damages certification; application of Unruh Act section 52 to Plaintiffs' claims	Misc. Research
2/20/2024	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ re discovery order from MJ Beeler; meet and confer with Defendants' re same	Discovery (Non-Deposition)
2/20/2024	Guy Wallace	0.5	\$1,350	\$675	meet and confer with ER; JB; MJ; MTJ; AX re MJ Beeler order and issue of depositions	Discovery (Non-Deposition)
2/20/2024	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of Defendants' letter of 2/16/24 re discovery issues; com's with MTJ re same	Discovery (Non-Deposition)
2/20/2024	Guy Wallace	0.5	\$1,350	\$675	review and analysis of MJ Beeler Order, ECF 725, and com's with RLS re depositions of residents	Discovery (Non-Deposition)
2/20/2024	Guy Wallace	0.5	\$1,350	\$675	analysis of documents that are necessary for supplementation re SA	Discovery (Non-Deposition)
2/20/2024	Guy Wallace	0.3	\$1,350	\$405	com's with Waters; Mastin; MTJ re site inspections	Experts (Including Retention)
2/20/2024	Mark Johnson	3.7	\$1,150	\$4,255	draft letter re discovery responding to OC ltr of 2/16/24	Discovery (Non-Deposition)
2/20/2024	Mark Johnson	0.8	\$1,150	\$920	follow up call w/ G Wallace re meet and confer w/ OC on reconsideration of depo order; analysis of and responses to ltr from OC re outstanding discovery	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/20/2024	Mark Johnson	0.1	\$1,150	\$115	call w GBW re scheduling of and strategy for meet and confer call w/ OC re reconsideration of depo order	Discovery (Non-Deposition)
2/20/2024	Mark Johnson	2.8	\$1,150	\$3,220	finish draft of letter to OC responding to 2/16 letter re multiple discovery disputes.	Discovery (Non-Deposition)
2/20/2024	Mark Johnson	0.3	\$1,150	\$345	call from G Wallace re ltr to OC re discovery issues.	Discovery (Non-Deposition)
2/20/2024	Rachel Steyer	0.2	\$750	\$150	email to GBW, TCC, MTJ re preparing subpoenas for happy camper depositions	Depositions
2/20/2024	Rachel Steyer	0.3	\$750	\$225	transmitting list of potential deponents to GBW, MTJ, TCC	Depositions
2/20/2024	Rachel Steyer	0.2	\$750	\$150	email to RBGG co-counsel, TCC, MTJ, GBW, BSU re scheduling and serving depo subpoena notices to happy camper declarants	Depositions
2/20/2024	Rachel Steyer	3.0	\$750	\$2,250	reviewing and updating supplemental preliminary disclosures	Discovery (Non-Deposition)
2/20/2024	Rachel Steyer	0.2	\$750	\$150	call with GBW to review outstanding discovery related issues re depositions/declarants before meet and confer	Discovery (Non-Deposition)
2/20/2024	Rachel Steyer	0.4	\$750	\$300	call with GBW to review outstanding discovery related matters, scheduling depositions	Discovery (Non-Deposition)
2/20/2024	Rachel Steyer	0.3	\$750	\$225	reviewing BBK reply declaration ISO class cert. motion to review defendant declarants and declaration withdrawal	Misc. Research
2/20/2024	Travis Close	0.3	\$850	\$255	Review and analyze def's 2-16-24 correspondence re: discovery issues	Case Organization, Planning and Strategy
2/20/2024	Travis Close	0.8	\$850	\$680	Analysis of def's proposed ESI search terms in light of plaintiffs' prior proposals and history of communications between parties	Case Organization, Planning and Strategy
2/20/2024	Travis Close	0.3	\$850	\$255	Finalize notes after meet and confer & send to team	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/20/2024	Travis Close	0.6	\$850	\$510	Meet and confer with defendants re: motion for reconsideration, inspections, depositions, communications with class members	Communications With Opposing Counsel
2/21/2024	Guy Wallace	1.1	\$1,350	\$1,485	revise and edit draft meet and confer letter from MTJ to ER	Discovery (Non-Deposition)
2/21/2024	Guy Wallace	0.5	\$1,350	\$675	com's with BBK; AX; MTJ re revisions to draft letter to Defendants' re Rutner letter of 2/16/24	Discovery (Non-Deposition)
2/21/2024	Guy Wallace	2.2	\$1,350	\$2,970	review and analysis of January 2024 list of categories of documents that require supplementation; revise and edit to limit same; com's with RLS re same	Discovery (Non-Deposition)
2/21/2024	Mark Johnson	2.3	\$1,150	\$2,645	pull, review and analyze docs for mtgs with R Stiner and S Stiner to discuss depo, supplemental document production and supplemental responses to rogs	Case Organization, Planning and Strategy
2/21/2024	Mark Johnson	3.2	\$1,150	\$3,680	multiple revisions to ltr to OC re numerous discovery disputes, responding to OC ltr of 2/15; coms w/ COC by email and phone re additional edits and strategies, related orders from court.	Discovery (Non-Deposition)
2/21/2024	Rachel Steyer	0.3	\$750	\$225	reviewing draft MTJ letter to OC re outstanding discovery disputes	Communications With Opposing Counsel
2/21/2024	Rachel Steyer	3.2	\$750	\$2,400	gathering up examples of categories of docs for supplementation	Discovery (Non-Deposition)
2/21/2024	Rachel Steyer	2.5	\$750	\$1,875	ongoing review of ED docs in prdocution	Discovery (Non-Deposition)
2/21/2024	Travis Close	2.4	\$850	\$2,040	Legal research re: duty/power to communicate with members of certified class	Case Organization, Planning and Strategy
2/21/2024	Travis Close	0.3	\$850	\$255	Email to team re: secondary sources on prohibitions against speaking with class members	Case Organization, Planning and Strategy
2/21/2024	Travis Close	1.8	\$850	\$1,530	Legal research re: whether opposing counsel can communicate with class members on litigation matters unrelated to the certified claims	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/21/2024	Travis Close	0.9	\$850	\$765	Review and analyze records released by City of Fairfield re: passenger boarding & securement policies for wheelchairs	Case Organization, Planning and Strategy
2/21/2024	Travis Close	1.7	\$850	\$1,445	Analysis of date ranges of current ESI produced by Defendants	Discovery (Non-Deposition)
2/21/2024	Travis Close	0.2	\$850	\$170	Review, analyze, and propose revisions for draft letter responding to def's discovery issue letter	Discovery (Non-Deposition)
2/22/2024	Guy Wallace	2.4	\$1,350	\$3,240	review and analysis of the party's letters re numerous discovery disputes; com's with JY; BBK; MTJ re meet and confer approach re same	Discovery (Non-Deposition)
2/22/2024	Guy Wallace	0.6	\$1,350	\$810	analysis of categories of documents and ESI that might reasonably be narrowed; com's with MTJ; TCC re same	Discovery (Non-Deposition)
2/22/2024	Mark Johnson	2.0	\$1,150	\$2,300	mtg w/ Rita Stiner re depo prep and scheduling; supplemental document production; interaction with Brookdale execs and staff	Case Organization, Planning and Strategy
2/22/2024	Mark Johnson	2.0	\$1,150	\$2,300	mtg w/ Cient S Stiner re recent issues, supplementing rog responses, access barriers, transportation issues.	Case Organization, Planning and Strategy
2/22/2024	Mark Johnson	0.5	\$1,150	\$575	call w G Wallace re new ltr from OC re discovery issues, meet and confer, recap of mtg with R and S Stiner.	Discovery (Non-Deposition)
2/22/2024	Mark Johnson	0.6	\$1,150	\$690	follow up call w/ G Wallace re analysis of D positions on discovery issues as set forth in new ltr from ER; strategy for meet and confer session on Friday.	Discovery (Non-Deposition)
2/22/2024	Mark Johnson	0.7	\$1,150	\$805	review Stiner prior responses to rogs, barrier list for SR	Discovery (Non-Deposition)
2/22/2024	Mark Johnson	0.3	\$1,150	\$345	review and analyze ltr from OC ER re multiple discovery issues; search for email referenced therein and com w/ COC re same	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/22/2024	Mark Johnson	0.5	\$1,150	\$575	review transcripts of Algarne depo, TAC and move out date to support argument that Ds could have deposed her on standing issues and don't need another deposition.	Discovery (Non-Deposition)
2/22/2024	Mark Johnson	0.6	\$1,150	\$690	prepare comparative analysis of competing proposals for FSP 30(b)(6) topic	Discovery (Non-Deposition)
2/22/2024	Mark Johnson	0.3	\$1,150	\$345	review draft joint discovery letter from B Bien-Kahn and cover email explanation and comment re strategy	Discovery (Non-Deposition)
2/22/2024	Rachel Steyer	0.2	\$750	\$150	reviewing OC response to letter re outstanding discovery issues pre meet and confer	Communications With Opposing Counsel
2/22/2024	Rachel Steyer	2.8	\$750	\$2,100	ongoing review of and gathering of documents for supplementation review	Discovery (Non-Deposition)
2/22/2024	Rachel Steyer	2.0	\$750	\$1,500	ongoing review of ED/HWD production/docs	Discovery (Non-Deposition)
2/22/2024	Travis Close	1.4	\$850	\$1,190	Review and analyze list of updated categories of documents to supplement, analyze revisions by GBW, and propose additional cuts & compromises to facilitate resolution	Case Organization, Planning and Strategy
2/22/2024	Travis Close	1.6	\$850	\$1,360	Review and analyze "Community Business Plans" produced to date for info on concerns re: staffing, emergency evacuation, disability access, and transportation	Case Organization, Planning and Strategy
2/22/2024	Travis Close	0.2	\$850	\$170	Email to team re: suggestions for additional compromises in categories of docs to request	Case Organization, Planning and Strategy
2/22/2024	Travis Close	0.6	\$850	\$510	Legal research re: unusual circumstances existing under CA Govt Code § 6253 (2021) to justify extension of initial response	Case Organization, Planning and Strategy
2/22/2024	Travis Close	0.3	\$850	\$255	Draft response to City of Santa Rosa re: past date of required response for public records act request	Case Organization, Planning and Strategy
2/22/2024	Travis Close	0.2	\$850	\$170	Review and analyze def's correspondence from today re: discovery disputes	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/22/2024	Travis Close	0.7	\$850	\$595	Fact-checking legal cites in def's letter re: access to contact lists for putative & certified class members	Case Organization, Planning and Strategy
2/22/2024	Travis Close	1.4	\$850	\$1,190	Analyze public records received thus far re: mobility device securement & update tracking spreadsheet	Case Organization, Planning and Strategy
2/22/2024	Travis Close	0.9	\$850	\$765	Review and analyze wheelchair securement & Boarding policies received by SC Valley Transportation Authority, City of Vacaville, Napa Valley Transport Authority, and Tri Delta	Case Organization, Planning and Strategy
2/22/2024	Travis Close	0.2	\$850	\$170	Email to team re: missing email from defendants from yesterday	Case Organization, Planning and Strategy
2/22/2024	Travis Close	0.6	\$850	\$510	Draft response to AC transit re: extension needed under public records act request	Discovery (Non-Deposition)
2/23/2024	Guy Wallace	1.2	\$1,350	\$1,620	preparation for meet and confer with Defendants re various discovery issues re depositions and interrogatory responses, document production and supplementation; com's with BU; BBK; AX; MTJ re same	Discovery (Non-Deposition)
2/23/2024	Guy Wallace	2.4	\$1,350	\$3,240	review and analysis of Defendants' claims re scope of obligations to provide Rule 30(b)(6) testimony and interrogatory responses; analysis of proper scope of further production of documents and ESI and supplementation re same	Discovery (Non-Deposition)
2/23/2024	Guy Wallace	1.3	\$1,350	\$1,755	zoom meet and confer with ER; Bertino; Jacobsen; BBK; AX; MTJ; TCC re various discovery issues and correspondence re same, including discussion of potential compromise resolutions	Discovery (Non-Deposition)
2/23/2024	Guy Wallace	0.4	\$1,350	\$540	com's with RLS re potential narrowing of categories of documents that should be supplemented by Defendants	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/23/2024	Guy Wallace	0.4	\$1,350	\$540	team zoom with JY; BBK; AX; BU; MTJ; TCC; RLS re discovery issues and remaining disputed issues to be submitted to MJ Beeler; Defendants' request for deposition of Algame	Discovery (Non-Deposition)
2/23/2024	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re motions to compel to be filed following completion of further meet and confer process with Defendants ordered by MJ Beeler	Other Motions
2/23/2024	Guy Wallace	0.3	\$1,350	\$405	review and analysis of draft motion to compel re class lists; com's with BBK re same	Other Motions
2/23/2024	Mark Johnson	0.4	\$1,150	\$460	follow-up call w/ G Wallace re issues that were the subject of discovery meet and confer and team mtg.	Case Organization, Planning and Strategy
2/23/2024	Mark Johnson	1.9	\$1,150	\$2,185	zoom mtg w/ OC re multiple discovery issues, including as set forth in correspondence of 2/15, 2/16 2/20 and 2/21.	Discovery (Non-Deposition)
2/23/2024	Mark Johnson	0.8	\$1,150	\$920	prepare agenda and review prior correspondence and other materials for omnibus discovery meet and confer with opposing counsel.	Discovery (Non-Deposition)
2/23/2024	Mark Johnson	1.1	\$1,150	\$1,265	team zoom mtg re follow up to meet and confer; various letter briefs, coverage for depositions and inspections.	Other Motions
2/23/2024	Rachel Steyer	0.5	\$750	\$375	weekly zoom with RBGG co-counsel, GBW, MTJ, TCC, BSU to review outstanding discovery issues	Case Organization, Planning and Strategy
2/23/2024	Rachel Steyer	0.3	\$750	\$225	searching emails to locate correspondence from OC re production of resident files	Communications With Opposing Counsel
2/23/2024	Rachel Steyer	0.2	\$750	\$150	reviewing BBK draft discovery letter re transportation class list	Discovery (Non-Deposition)
2/23/2024	Rachel Steyer	1.4	\$750	\$1,050	ongoing review of and revising supplemental initial disclosures	Discovery (Non-Deposition)
2/23/2024	Rachel Steyer	0.2	\$750	\$150	reviewing defendants' portion of letter brief re depositions	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/23/2024	Rachel Steyer	0.2	\$750	\$150	discussion with GBW re discovery tasks, preparing depos/subpoenas, supplementation	Discovery (Non-Deposition)
2/23/2024	Rachel Steyer	0.2	\$750	\$150	reviewing draft BBK discovery letter re class lists	Discovery (Non-Deposition)
2/23/2024	Rachel Steyer	0.6	\$750	\$450	reviewing categories of supplementation and identifying missing docs	Discovery (Non-Deposition)
2/23/2024	Travis Close	0.3	\$850	\$255	Review and analyze comparison of Pltfs' vs. Def's proposed topics on fleet safety 30b6 deposition	Case Organization, Planning and Strategy
2/23/2024	Travis Close	0.2	\$850	\$170	Review and analyze agenda for today's meet and confer call with Def's	Case Organization, Planning and Strategy
2/23/2024	Travis Close	1.6	\$850	\$1,360	Meet and confer with defendants re: discovery issues, depositions, inspections, answers to ROGs, joint letter briefs	Case Organization, Planning and Strategy
2/23/2024	Travis Close	0.4	\$850	\$340	Revise & organize notes from today's m/c call with defendants	Case Organization, Planning and Strategy
2/23/2024	Travis Close	0.5	\$850	\$425	Draft letter to Union City re: delay in responding to PRA request and request for timeline of productions	Case Organization, Planning and Strategy
2/23/2024	Travis Close	0.8	\$850	\$680	Review and analyze policies & procedures provided by Solano County Transit re: wheelchair boarding and securement	Case Organization, Planning and Strategy
2/23/2024	Travis Close	1.2	\$850	\$1,020	Weekly meeting with MTJ, GBW, and co-counsel re: responses needed to today's meet and confer call, and joint letter briefs	Case Organization, Planning and Strategy
2/23/2024	Travis Close	0.3	\$850	\$255	Email to team re: scope of certified class including manual wheelchairs	Case Organization, Planning and Strategy
2/23/2024	Travis Close	0.3	\$850	\$255	Draft response to City of Rio Vista re: status of search and date of expected production	Case Organization, Planning and Strategy
2/23/2024	Travis Close	0.5	\$850	\$425	Updates to PRA tracking spreadsheet for wheelchair boarding & securement policies	Case Organization, Planning and Strategy
2/23/2024	Travis Close	0.3	\$850	\$255	Review and analyze def's draft joint letter brief re: motion for reconsideration	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/23/2024	Travis Close	0.6	\$850	\$510	Research case authority cited in def's letter from yesterday re: scope of 30b6 subject matter topics	Case Organization, Planning and Strategy
2/23/2024	Travis Close	0.3	\$850	\$255	Review and analyze revised joint letter brief re: contact info for transportation class & putative subclass	Case Organization, Planning and Strategy
2/25/2024	Guy Wallace	1.1	\$1,350	\$1,485	legal research and analysis re Olean and its progeny re whether individualized inquiries re injury would predominate over common questions	Class Certification
2/25/2024	Guy Wallace	4.7	\$1,350	\$6,345	review and analysis of documents for which Plaintiffs need supplementation from Defendants, and narrowing requests re same to current scope of case; policies, organizational charts, job descriptions, training manuals and guides, budget and finance and incentives, personal service assessment, Service Alignment, complaints, access issues, reports and scheduling, emergency evacuation	Discovery (Non-Deposition)
2/25/2024	Guy Wallace	1.2	\$1,350	\$1,620	preparation of revised draft of documents and categories of documents that should be supplemented by Defendants	Discovery (Non-Deposition)
2/25/2024	Guy Wallace	0.5	\$1,350	\$675	review and analysis of draft Rule 30(b)(6) notice re Fleet Safety Policy	Discovery (Non-Deposition)
2/25/2024	Mark Johnson	1.5	\$1,150	\$1,725	draft Rule 30b6 depo notice re transportation / FSP	Depositions
2/26/2024	Guy Wallace	0.5	\$1,350	\$675	review and analysis of draft depo notice re FSP; com's with MTJ; TCC re preparation for deposition and identification of further documents, including Michael Johnson emails, re same	Depositions
2/26/2024	Guy Wallace	0.6	\$1,350	\$810	revise and edit Rule 30(b)(6) depo notice re FSP; com's with MTJ re same	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/26/2024	Guy Wallace	3.1	\$1,350	\$4,185	review and analysis of documents sought re supplementation; ESI and narrowing of custodians and search terms; com's with MTJ re same	Discovery (Non-Deposition)
2/26/2024	Guy Wallace	0.7	\$1,350	\$945	com's with Waters; Mastin; MTJ; AX re further site inspections of Defendants' facilities	Experts (Including Retention)
2/26/2024	Guy Wallace	0.7	\$1,350	\$945	com's with Marks; Thornton; BU; MTJ re staffing analyses and Rule 26 reports	Experts (Including Retention)
2/26/2024	Mark Johnson	0.7	\$1,150	\$805	video call with Marks, Thornton, Umpierre, Wallace re staffing analysis, data production.	Case Organization, Planning and Strategy
2/26/2024	Mark Johnson	1.0	\$1,150	\$1,150	calls w/ G Wallace (x7) re D position on rogs, revised custodian and search term lists, draft notice of 30b6 depo and revisions to same, call w/ COC re data and staffing analysis, depositions of Johnson and Stiner	Case Organization, Planning and Strategy
2/26/2024	Mark Johnson	0.3	\$1,150	\$345	email coms w/ L Castro, R. Bonner re processing and reviewing and coding docs provided by R Stiner; com w/ R. Bonner re analysis of D expert photos.	Case Organization, Planning and Strategy
2/26/2024	Mark Johnson	0.3	\$1,150	\$345	review T Close proposed edits to 30(b)(6) depo notice; email re same and possible deletions from list of documents.	Depositions
2/26/2024	Mark Johnson	0.8	\$1,150	\$920	further revisions to 30b6 depo notice re FSP policy, incorporating edits from COC and circulating redline and clean versions.	Depositions
2/26/2024	Mark Johnson	0.5	\$1,150	\$575	email exchanges w/ Bien-Kahn and Xu re proposed email to OC re D position on interrogatories.	Discovery (Non-Deposition)
2/26/2024	Mark Johnson	0.1	\$1,150	\$115	emails w/ Waters, Mastin, COC re mtg to discuss scope of inspections.	Discovery (Non-Deposition)
2/26/2024	Mark Johnson	0.1	\$1,150	\$115	emails w/ R Steyer re list of docs to be supplemented, status of production of certain items on list	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/26/2024	Mark Johnson	0.3	\$1,150	\$345	review and draft response to OC Rutner re position on interrogatories; follow-up emails w/ OC and COC re same.	Discovery (Non-Deposition)
2/26/2024	Mark Johnson	0.2	\$1,150	\$230	review and draft response to OC Bertino email re reasons for not producing promised declarant resident files	Discovery (Non-Deposition)
2/26/2024	Mark Johnson	3.7	\$1,150	\$4,255	review and revise proposed list of ESI custodians and proposed search terms and list of docs for which supplementation is required; draft email to co-counsel describing same and seeking input.	Discovery (Non-Deposition)
2/26/2024	Mark Johnson	0.5	\$1,150	\$575	call w/ access experts Mastin and Waters re scope of upcoming inspections, with Amy Xu, Ben Bien-Kahn, Wallace.	Experts (Including Retention)
2/26/2024	Mark Johnson	0.1	\$1,150	\$115	review proposed email to OC re letter briefs on class contacts; com w/ B Bien Kahn re same	Other Motions
2/26/2024	Rachel Steyer	0.2	\$750	\$150	reviewing and editing draft 30b6 depo notice	Depositions
2/26/2024	Rachel Steyer	0.2	\$750	\$150	reviewing internal correspondence with RBGG re draft email to send to OC re position on interrogatories	Discovery (Non-Deposition)
2/26/2024	Rachel Steyer	1.9	\$750	\$1,425	reviewing and gathering production for account history report docs	Discovery (Non-Deposition)
2/26/2024	Travis Close	0.3	\$850	\$255	Review and analyze revisions to draft joint letter brief combining putative & transportation class lists	Case Organization, Planning and Strategy
2/26/2024	Travis Close	1.4	\$850	\$1,190	Review, analyze, and propose revisions for draft notice re 30b6 deposition on transportation topics	Case Organization, Planning and Strategy
2/26/2024	Travis Close	0.8	\$850	\$680	Legal research on DOT/DOJ's scope of "other power-driven mobility devices"	Case Organization, Planning and Strategy
2/26/2024	Travis Close	0.4	\$850	\$340	Email to GBW re: additional categories of docs to consider adding in 30b6 depo notice	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/26/2024	Travis Close	0.6	\$850	\$510	Review and analyze reply declaration of Doug Cross for instances of discrimination at BKD facilities alleged & categories of docs not yet included in 30b6 notice	Case Organization, Planning and Strategy
2/26/2024	Travis Close	0.3	\$850	\$255	Email to MTJ, GBW re: strategy for requesting further emergency plans	Case Organization, Planning and Strategy
2/26/2024	Travis Close	1.0	\$850	\$850	Additional revisions to proposed 30b6 notice in response to MTJ comments	Depositions
2/26/2024	Travis Close	0.5	\$850	\$425	Draft email to RLS re: new assignment for Michael Johnson depo prep	Depositions
2/26/2024	Travis Close	0.8	\$850	\$680	Review and analyze further revisions to categories of requested supplementation by GBW and RLS; compare to previous versions to articulate changes	Discovery (Non-Deposition)
2/26/2024	Travis Close	0.4	\$850	\$340	Updates to spreadsheet tracking responses to PRA requests re: wheelchair boarding & securement	Discovery (Non-Deposition)
2/26/2024	Travis Close	1.4	\$850	\$1,190	Analysis of missing emergency evacuation plans for Tracy facility	Discovery (Non-Deposition)
2/27/2024	Guy Wallace	0.5	\$1,350	\$675	analysis of and com's with MTJ re Rule 30(b)(6) notice re Michael Johnson; revised list of ESI search terms and custodians and list of documents to be supplemented by Defendants	Discovery (Non-Deposition)
2/27/2024	Guy Wallace	0.4	\$1,350	\$540	review and analysis of draft motion to compel re Plaintiffs' pending interrogatories; com's with AX; MTJ re same	Other Motions
2/27/2024	Guy Wallace	0.3	\$1,350	\$405	review and analysis of Plaintiffs' opposition section re letter brief re motion for reconsideration re depositions	Other Motions
2/27/2024	Mark Johnson	0.3	\$1,150	\$345	calls w/ G Wallace re site inspection schedule; doc supplementation list, D declarant resident files.	Case Organization, Planning and Strategy
2/27/2024	Mark Johnson	0.2	\$1,150	\$230	email exchange w/ R Steyer re identity and status of San Ramon declarants for depo; locate and provide prior email based on Stiner information	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/27/2024	Mark Johnson	0.8	\$1,150	\$920	revise and finalize notice of 30(b)(6) FSP depo to incorporate additional suggestions from T. Close / G Wallace; research files for reference to alleged local transportation files; draft email to OC re depo notice.	Depositions
2/27/2024	Mark Johnson	0.2	\$1,150	\$230	revise and send email to OC re the parties' position on D demand for further depo of J Algarme; coms w A Spiegel re same.	Depositions
2/27/2024	Mark Johnson	0.2	\$1,150	\$230	review email from A Xu re plan for depositions of D resident declarants and propose schedule for same; respond re same.	Depositions
2/27/2024	Mark Johnson	0.9	\$1,150	\$1,035	revise and finalize proposed lists of ESI custodians, ESI search terms and list of documents for supplemental document production; draft email to opposing counsel re same.	Discovery (Non-Deposition)
2/27/2024	Mark Johnson	0.2	\$1,150	\$230	preliminary review of J Maher work product on review of D expert photos and matching with P expert photos	Discovery (Non-Deposition)
2/27/2024	Mark Johnson	0.8	\$1,150	\$920	email exchanges w/ OC E Rutner re changes in site inspection schedule, need for flexibility; email exchanges w/ experts re availability and conflicts; call with J Mastin (.1) re same.	Discovery (Non-Deposition)
2/27/2024	Mark Johnson	1.3	\$1,150	\$1,495	review and draft edits to B Bien-Kahn draft ltr brief section in opp to D's motion for reconsideration of depo order	Other Motions
2/27/2024	Mark Johnson	1.5	\$1,150	\$1,725	work on revised version of ltr brief on production of benchmark formula	Other Motions
2/27/2024	Mark Johnson	0.2	\$1,150	\$230	review and propose edits to A Xu draft final section on letter brief re interrogatory responses.	Other Motions
2/27/2024	Rachel Steyer	0.5	\$750	\$375	meeting with AX and KS to review and discuss preparing depo subpoena notices	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/27/2024	Rachel Steyer	0.5	\$750	\$375	reviewing depo testimony for cites for discovery letter brief re depos	Depositions
2/27/2024	Rachel Steyer	0.2	\$750	\$150	reviewing BBK draft portion of letter brief re depos	Discovery (Non-Deposition)
2/27/2024	Rachel Steyer	0.2	\$750	\$150	further review of updated BBK letter brief re depos	Discovery (Non-Deposition)
2/27/2024	Rachel Steyer	0.4	\$750	\$300	reviewing and editing BBK draft letter briefs re class lists	Discovery (Non-Deposition)
2/27/2024	Travis Close	0.8	\$850	\$680	Review and analyze adequacy of 30b6 designee testimony re: task times	Case Organization, Planning and Strategy
2/27/2024	Travis Close	0.3	\$850	\$255	Email to GBW, MTJ re: defendants' position on production of remaining emergency evacuation plans	Case Organization, Planning and Strategy
2/27/2024	Travis Close	1.3	\$850	\$1,105	Call with Doug Cross re: update on rule 26 report requirements & equivalency standard	Case Organization, Planning and Strategy
2/27/2024	Travis Close	1.4	\$850	\$1,190	Review and analyze communications & subpoenas related to first round of inspections at former Brookdale facilities to rebut claims of difficulty by defendants	Case Organization, Planning and Strategy
2/27/2024	Travis Close	0.5	\$850	\$425	Review and analyze Def's interrogatory responses for info on local transportation policies	Discovery (Non-Deposition)
2/27/2024	Travis Close	1.7	\$850	\$1,445	Depo prep - Review and analyze emails in which Michael Johnson appears as TO, FROM, or CC, BKD2078942-BKD2651489 (118-186 of 237)	Discovery (Non-Deposition)
2/27/2024	Travis Close	1.6	\$850	\$1,360	Depo prep - Review and analyze emails in which Michael Johnson appears as TO, FROM, or CC, BKD2651489-BKD2932181 (186-237 of 237)	Discovery (Non-Deposition)
2/27/2024	Travis Close	0.3	\$850	\$255	Email to team re: email found showing Brookdale admitting that it does not comply with the text of ADA	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/28/2024	Guy Wallace	1.2	\$1,350	\$1,620	com's with JRA; MTJ re potential deposition of Algarne sought by Defendants; response re same; review and analysis of Langer and district court case re Langer	Discovery (Non-Deposition)
2/28/2024	Guy Wallace	0.9	\$1,350	\$1,215	com's with MTJ; BBK re site inspection schedule; meet and confer efforts with Defendants re same; Plaintiffs' response re same and protocol for experts re same given Defendants' belated disclosure that their experts will observe, but not take their own measurements	Discovery (Non-Deposition)
2/28/2024	Mark Johnson	0.5	\$1,150	\$575	call w/ G Wallace re email from OC Rutner concerning demand for depo of Jeannette Algarne on intent to return to Brookhurst and demand for supplementation of rogs and RPDs allegedly related to issue; review rogs and RPDs and discuss same.	Depositions
2/28/2024	Mark Johnson	0.3	\$1,150	\$345	follow up call w G Wallace re D demand for second deposition of J Algarne	Depositions
2/28/2024	Mark Johnson	0.2	\$1,150	\$230	review Langer and district court case on issue of credibility w/ respect to intent to return for ADA standing purposes.	Discovery (Non-Deposition)
2/28/2024	Mark Johnson	0.7	\$1,150	\$805	review draft ltr to mediator, OC re mediation, com w/ GBW re same.	Settlement
2/28/2024	Rachel Steyer	5.0	\$750	\$3,750	reviewing and preparing chart tracking new production of resident files	Discovery (Non-Deposition)
2/28/2024	Rachel Steyer	0.2	\$750	\$150	reviewing defendants' portion of joint letter brief	Discovery (Non-Deposition)
2/28/2024	Travis Close	0.3	\$850	\$255	Email to team re: redacted resident evacuation ability form produced	Case Organization, Planning and Strategy
2/28/2024	Travis Close	0.5	\$850	\$425	Compare resident evacuation ability reports produced for scotts valley with previous versions produced at other facilities	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/28/2024	Travis Close	0.6	\$850	\$510	Call with opposing counsel re: coordination site inspections	Case Organization, Planning and Strategy
2/28/2024	Travis Close	0.2	\$850	\$170	Email to team re: renovations at former Fountaingrove facility	Case Organization, Planning and Strategy
2/28/2024	Travis Close	0.8	\$850	\$680	Review and analyze records produced by City of Petaluma re: wheelchair boarding & securement policies	Case Organization, Planning and Strategy
2/28/2024	Travis Close	0.5	\$850	\$425	Review and analyze updated emergency evacuation plans produced by Brookdale in latest productio	Case Organization, Planning and Strategy
2/28/2024	Travis Close	0.5	\$850	\$425	Updates to Rule 26 chart for emergency evacuation	Case Organization, Planning and Strategy
2/28/2024	Travis Close	0.3	\$850	\$255	Review and analyze revised letter brief re: interrogatories	Case Organization, Planning and Strategy
2/28/2024	Travis Close	0.4	\$850	\$340	Review, analyze, and propose revisions for draft letter brief re: wheelchair and scooter class names and contact info	Case Organization, Planning and Strategy
2/28/2024	Travis Close	1.7	\$850	\$1,445	Depo prep -- Analyze & organize emails collected for Michael Johnson deposition in appropriate folders & subfolders	Depositions
2/28/2024	Travis Close	1.5	\$850	\$1,275	Review and analyze Def's latest production of docsfor updated transportation policies, procedures, or data affecting implementation of the fleet safety policy	Discovery (Non-Deposition)
2/28/2024	Travis Close	0.7	\$850	\$595	Finish organizing public records received to-date in response to PRA requests to transit agencies & send to Doug Cross for review	Experts (Including Retention)
2/29/2024	Guy Wallace	0.7	\$1,350	\$945	com's with BBK; AX; MTJ re motions to compel; site inspections; proposed ESI supplementation and com's to Defendants' counsel re same	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/29/2024	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ; TCC; RAB re Defendants' (Rutner) claims re number of hits created by Plaintiffs' recent proposed ESI search terms; inaccurate nature of such claims	Discovery (Non-Deposition)
2/29/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re expert inspections	Class Certification
2/29/2024	Jennifer Bybee	1.8	\$925	\$1,665	Draft email re which rooms were not inspected by experts for various reasons	Discovery (Non-Deposition)
2/29/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with co-counsel re site inspections	Experts (Including Retention)
2/29/2024	Mark Johnson	0.2	\$1,150	\$230	draft emails to OC re supplemental ESI search terms and custodians and confirmation and scope of inspections.	Discovery (Non-Deposition)
2/29/2024	Rachel Steyer	0.2	\$750	\$150	reviewing email from JUB summarizing units inspected	Discovery (Non-Deposition)
2/29/2024	Travis Close	0.4	\$850	\$340	Review and analyze draft subpoena & tracking chart re: happy camper depositions	Case Organization, Planning and Strategy
2/29/2024	Travis Close	1.3	\$850	\$1,105	Continue drafting outline for Johnson 30b6 deposition (complaints, safety)	Case Organization, Planning and Strategy
2/29/2024	Travis Close	0.6	\$850	\$510	Review and analyze emails compiled by RLS for Johnson deposition outline	Case Organization, Planning and Strategy
2/29/2024	Travis Close	0.3	\$850	\$255	Email to team re: proposed further analysis of search string results in ESI based on def's response	Case Organization, Planning and Strategy
2/29/2024	Travis Close	0.2	\$850	\$170	Email to MTJ re: depo prep assignment for Michael Johnson	Depositions
2/29/2024	Travis Close	1.6	\$850	\$1,360	Depo prep -- draft outline for 30b6 depo of michael johnson (intro, background, 30b6 notice)	Depositions
2/29/2024	Travis Close	2.2	\$850	\$1,870	Continue drafting depo outline for Michael Johnson deposition (Transportation services, Transportation Policy, Admissions representation, Outings, etc)	Depositions
2/29/2024	Travis Close	0.5	\$850	\$425	Review, analyze, and propose revisions for draft joint letter brief re: contact list of certified transportation class	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/29/2024	Travis Close	0.3	\$850	\$255	Review and analyze Def's reply re: motion for reconsideration of judge beeler's order re depositions	Discovery (Non-Deposition)
3/1/2024	Guy Wallace	0.6	\$1,350	\$810	com's with JY; BBK; AX; MTJ re depositions and Defendants' motion for reconsideration	Depositions
3/1/2024	Guy Wallace	0.2	\$1,350	\$270	zoom meet and confer with Defendants; BBK re Defendants' motion for reconsideration	Discovery (Non-Deposition)
3/1/2024	Guy Wallace	0.8	\$1,350	\$1,080	zoom with GG; JY; BBK; AX; BU; MTJ; TCC; RLS re Defendants' motion for reconsideration; production of ESI; data for staffing analysis; resident files; further motions to compel and meet and confer efforts	Discovery (Non-Deposition)
3/1/2024	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ; RLS re Defendants' non-production of resident files; meet and confer steps re same	Discovery (Non-Deposition)
3/1/2024	Guy Wallace	0.5	\$1,350	\$675	review and analysis of further potential meet and confer efforts and communications to Defendants re issues of ESI and supplementation; com's with MTJ; TCC re same	Discovery (Non-Deposition)
3/1/2024	Guy Wallace	0.6	\$1,350	\$810	com's with Waters; RLS re site inspection of Tracy facility	Experts (Including Retention)
3/1/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re case status and discovery	Discovery (Non-Deposition)
3/1/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re G. Waters inspections	Experts (Including Retention)
3/1/2024	Mark Johnson	1.0	\$1,150	\$1,150	Team Zoom Call with Wallace, Grunfeld, Umpierre, Xu, Yelin, Bien-Kahn, Steyer, others re site inspections, supplemental ESI production, resident declarant files and other discovery issues.	Case Organization, Planning and Strategy
3/1/2024	Mark Johnson	0.2	\$1,150	\$230	calls (x3) with G Wallace re D's position on document supplementation, email exchange, our position on proposed letter briefs re resident declaration files	Case Organization, Planning and Strategy
3/1/2024	Mark Johnson	0.1	\$1,150	\$115	draft email to R Steyer re site inspections and communication w/ G Waters	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/1/2024	Mark Johnson	0.3	\$1,150	\$345	re-work draft email to opposing counsel re search terms and custodians for supplemental ESI test, responsive to their email; com w G Wallace re same	Discovery (Non-Deposition)
3/1/2024	Rachel Steyer	0.9	\$750	\$675	weekly meeting with RBGG, GBW, MTJ, TCC, BSU to discuss adn review ongoing tasks and assignments	Case Organization, Planning and Strategy
3/1/2024	Rachel Steyer	0.5	\$750	\$375	zoom with GBW and Gary Waters to review and discuss Tracy site inspection	Discovery (Non-Deposition)
3/1/2024	Rachel Steyer	0.2	\$750	\$150	transmitting declaration and Tracy barrier report to Gary in advance of inspection	Discovery (Non-Deposition)
3/1/2024	Travis Close	1.5	\$850	\$1,275	Depo prep - continue drafting deposition outline of Michael Johnson (FSP's prohibitions on scooters and exceptions)	Case Organization, Planning and Strategy
3/1/2024	Travis Close	0.1	\$850	\$85	Further meet and confer with defendants re: motion for reconsideration	Case Organization, Planning and Strategy
3/1/2024	Travis Close	0.9	\$850	\$765	Team meeting with RLS, GBW, MTJ, co-counsel re: discovery disputes, inspections, and subpoenas	Case Organization, Planning and Strategy
3/1/2024	Travis Close	1.3	\$850	\$1,105	Draft response to opposing counsel re: next proposal on search terms, ESI, and custodians	Case Organization, Planning and Strategy
3/1/2024	Travis Close	1.5	\$850	\$1,275	Analyze previous search terms proposed by Pltfs/Defcs, previous custodians proposed by each, and communications from 2020-2023 re: same	Case Organization, Planning and Strategy
3/1/2024	Travis Close	1.6	\$850	\$1,360	Analysis of prior depo testimony re: transportation policies, FSP, complaints on bus	Depositions
3/1/2024	Travis Close	0.3	\$850	\$255	Review and analyze notices of deposition served for Luana Williams, Joe Williams, John Beaty, Diana Kaufeldt, and Kenneth Joyce	Depositions
3/2/2024	Guy Wallace	0.2	\$1,350	\$270	com's with MTJ re ESI supplementation and MTC re same	Discovery (Non-Deposition)
3/2/2024	Guy Wallace	0.3	\$1,350	\$405	com's with Waters; Mastin; MTJ re method for measurement of speed of door closures	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/2/2024	Guy Wallace	1.2	\$1,350	\$1,620	legal research and analysis re attorney-client relationship with members of the FSP class; review and analysis of TCC email re same	Misc. Research
3/2/2024	Mark Johnson	0.2	\$1,150	\$230	calls (x2) w/ G Wallace re search terms, mtn to compel ESI, comparision of D and P proposal	Discovery (Non-Deposition)
3/3/2024	Rachel Steyer	1.0	\$750	\$750	travel in car from SF to Brookdale Tracy to attend site inspection	Discovery (Non-Deposition)
3/3/2024	Rachel Steyer	1.2	\$750	\$900	return travel from Brookdale Tracy back to SF	Discovery (Non-Deposition)
3/3/2024	Rachel Steyer	9.0	\$750	\$6,750	attended and observed Brookdale Tracy site inspection from 8:15am to 5:15pm	Discovery (Non-Deposition)
3/4/2024	Guy Wallace	1.6	\$1,350	\$2,160	review and analysis of proposed custodians and ESI search terms; com's with MTJ; RLS re Defendants' supplemental production and ways to narrow Plaintiffs' proposed production re same	Discovery (Non-Deposition)
3/4/2024	Mark Johnson	0.7	\$1,150	\$805	research prior correspondence among counsel re FSP production, search terms and custodians and draft memo re same for G Wallace and co-counsel	Discovery (Non-Deposition)
3/4/2024	Mark Johnson	0.3	\$1,150	\$345	review and analyze D email re status of staffing data production, explanations for missing data, proposed motion to compel and arguments re sufficiency of data, forward to cocounsel	Discovery (Non-Deposition)
3/4/2024	Rachel Steyer	2.9	\$750	\$2,175	preparing site inspection memo summarizing observation of site inspection, reviewing notes	Discovery (Non-Deposition)
3/4/2024	Rachel Steyer	0.6	\$750	\$450	call with BBK to review and discuss site inspection	Discovery (Non-Deposition)
3/4/2024	Rachel Steyer	2.0	\$750	\$1,500	cross referencing categories for supplementation and latest productions	Discovery (Non-Deposition)
3/4/2024	Rachel Steyer	0.4	\$750	\$300	reviewing defendants' portions/responses to discovery letter briefs re class lists	Discovery (Non-Deposition)
3/4/2024	Rachel Steyer	0.2	\$750	\$150	response to GBW, MTJ, RAB re categories of docs for supplementation that have been produced	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/4/2024	Travis Close	0.2	\$850	\$170	Email to MTJ re: Def's proposed search terms	Case Organization, Planning and Strategy
3/4/2024	Travis Close	0.2	\$850	\$170	Email to team re: strategy for limited time inspections	Case Organization, Planning and Strategy
3/4/2024	Travis Close	1.6	\$850	\$1,360	Review and analyze ESI communications produced thus far related to reasonable accommodations and modifications	Case Organization, Planning and Strategy
3/4/2024	Travis Close	0.3	\$850	\$255	Emails to RLS re: new transportation policies spotted at yesterday's inspection of Tracy facility	Case Organization, Planning and Strategy
3/4/2024	Travis Close	0.2	\$850	\$170	Email to MTJ re: previous custodians used in 2020 ESI collection efforts	Case Organization, Planning and Strategy
3/4/2024	Travis Close	0.6	\$850	\$510	Review and analyze court's Feb 1 hearing transcript	Case Organization, Planning and Strategy
3/4/2024	Travis Close	0.2	\$850	\$170	Email to GBW re: follow-up after court's Feb 1 hearing on likely results	Case Organization, Planning and Strategy
3/4/2024	Travis Close	1.3	\$850	\$1,105	Depo prep -- continue drafting outline of depo for Michael Johnson (modifications to FSP)	Case Organization, Planning and Strategy
3/4/2024	Travis Close	1.3	\$850	\$1,105	Depo prep -- continue drafting outline for Michael Johnson deposition (reasonable modifications/accommmodations)	Depositions
3/4/2024	Travis Close	0.4	\$850	\$340	Email to MTJ re: different format of email communications re: proposed ESI custodians	Discovery (Non-Deposition)
3/4/2024	Travis Close	0.7	\$850	\$595	Review and analyze previous memos written by me & co-counsel re: site inspections to inform strategy for current inspections	Discovery (Non-Deposition)
3/4/2024	Travis Close	0.5	\$850	\$425	Analyze/verify latest versions of transportation policies produced by Brookdale after report of new policies at yesterday's inspection	Discovery (Non-Deposition)
3/5/2024	Guy Wallace	1.6	\$1,350	\$2,160	revise and edit list of documents that Defendants must supplement; com's with MTJ; TCC; RLS re same	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/5/2024	Guy Wallace	0.5	\$1,350	\$675	review and analysis of HWD Manual	Discovery (Non-Deposition)
3/5/2024	Mark Johnson	2.9	\$1,150	\$3,335	draft ltr to OC re search terms and custodians	Discovery (Non-Deposition)
3/5/2024	Rachel Steyer	0.2	\$750	\$150	reviewing access depo transcript for discussion of maintenance manual	Depositions
3/5/2024	Rachel Steyer	0.4	\$750	\$300	call with GBW to review and discuss categories of docs for supplementation	Discovery (Non-Deposition)
3/5/2024	Rachel Steyer	1.7	\$750	\$1,275	reviewing prodction for billing documents	Discovery (Non-Deposition)
3/5/2024	Rachel Steyer	4.0	\$750	\$3,000	review of production for any/all docs corresponding to Brookdale Tracy residents	Discovery (Non-Deposition)
3/5/2024	Travis Close	0.4	\$850	\$340	Call with GBW re: further narrowing of additional supplemental discovery to ask for	Case Organization, Planning and Strategy
3/5/2024	Travis Close	1.4	\$850	\$1,190	Edits/revisions to chart of emergency planning documents by facility and by plaintiffs' residency	Case Organization, Planning and Strategy
3/5/2024	Travis Close	1.3	\$850	\$1,105	Continue drafting rule 26 analysis of emergency plans for Kailes' reports	Case Organization, Planning and Strategy
3/5/2024	Travis Close	1.3	\$850	\$1,105	Depo prep -- continue drafting outline for Michael Johnson deposition (driver hiring)	Case Organization, Planning and Strategy
3/5/2024	Travis Close	1.2	\$850	\$1,020	Depo prep -- continue drafting outline for Michael Johnson deposition (driver training)	Depositions
3/6/2024	Guy Wallace	0.6	\$1,350	\$810	review and analysis of draft letter from MTJ to Defendants' counsel re supplementation of documents and ESI	Communications With Opposing Counsel
3/6/2024	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of further cuts to demand for supplementation of documents and ESI by Defendants, including revisions re custodians; search terms; com's with MTJ re same	Discovery (Non-Deposition)
3/6/2024	Guy Wallace	1.2	\$1,350	\$1,620	revise and edit motions to compel re class lists; legal research and analysis re law of the case; com's with BBK; AX; MTJ re same	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/6/2024	Mark Johnson	0.1	\$1,150	\$115	review draft email from A Xu for Ds re depo scheduling and email response re additional point to make	Depositions
3/6/2024	Mark Johnson	2.5	\$1,150	\$2,875	continue working on letter proposing alternative search terms and custodians for supplemental ESI.	Discovery (Non-Deposition)
3/6/2024	Mark Johnson	2.8	\$1,150	\$3,220	review and analyze ltr from OC re search terms and custodians, results of test searches; re-work draft letter to respond to same; email to GW (.1) re same.	Discovery (Non-Deposition)
3/6/2024	Mark Johnson	0.3	\$1,150	\$345	review email from J Thornton re missing data, timing of staffing analysis; draft email to OC re same demanding data and circulate for review.	Discovery (Non-Deposition)
3/6/2024	Mark Johnson	0.5	\$1,150	\$575	review draft letter briefs with reply section re class list and putative class list from BBK and comment re same.	Other Motions
3/6/2024	Mark Johnson	0.2	\$1,150	\$230	call w G Wallace re letter brief re class list and legal research re law of the case.	Other Motions
3/6/2024	Rachel Steyer	0.2	\$750	\$150	reviewing MTJ draft response to OC re ESI search terms and supplementation	Communications With Opposing Counsel
3/6/2024	Rachel Steyer	3.5	\$750	\$2,625	ongoing review of production for ED/HWD docs	Discovery (Non-Deposition)
3/6/2024	Travis Close	1.0	\$850	\$850	Review and analyze records produced by Golden Gate Bridge & Highway Transportation re: wheelchair boarding & securement policies	Case Organization, Planning and Strategy
3/6/2024	Travis Close	0.6	\$850	\$510	Draft response to Unit City Transit re: delay of production & refusal to communicate with contracted entity	Case Organization, Planning and Strategy
3/6/2024	Travis Close	0.4	\$850	\$340	Call to East Bay Paratransit re: follow-up about PRA request and identification of records	Case Organization, Planning and Strategy
3/6/2024	Travis Close	0.3	\$850	\$255	Draft email to East Bay Paratransit sending public records act request re: wheelchair securement & boarding policies/trainings	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/6/2024	Travis Close	0.3	\$850	\$255	Call to tri-delta transit / Transdev re: follow up to public records act request	Case Organization, Planning and Strategy
3/6/2024	Travis Close	0.3	\$850	\$255	Email to LAVTA re: follow up to PRA request made over thirty days ago for wheelchair securement policies	Case Organization, Planning and Strategy
3/6/2024	Travis Close	0.6	\$850	\$510	Updates to spreadsheet tracking PRA requests made, responses received, and correspondence	Case Organization, Planning and Strategy
3/6/2024	Travis Close	0.5	\$850	\$425	Review, analyze, and provide revisions for draft joint letter brief re: production of the names/contact info of the wheelchair and scooter users subclass	Case Organization, Planning and Strategy
3/6/2024	Travis Close	0.3	\$850	\$255	Email to co-counsel re: Defendants' extreme position taken with respect to class member IDs led to redaction of resident evacuation lists	Case Organization, Planning and Strategy
3/6/2024	Travis Close	0.6	\$850	\$510	Review and analyze records produced by San Mateo County Transit District re: wheelchair boarding and securement policies	Case Organization, Planning and Strategy
3/6/2024	Travis Close	0.4	\$850	\$340	Review and analyze defendants' march 6 correspondence re: search terms and supplemental ESI; analyze their revised search terms to our proposed terms to understand changes made	Case Organization, Planning and Strategy
3/6/2024	Travis Close	1.6	\$850	\$1,360	Depo prep -- continue drafting outline for deposition of Michael Johnson (compliance, safety, BEST Standards)	Case Organization, Planning and Strategy
3/6/2024	Travis Close	0.9	\$850	\$765	Depo prep -- continue drafting outline for Michael Johnson 30b6 deposition (hiring - securement policies)	Depositions
3/6/2024	Travis Close	0.3	\$850	\$255	Draft response to Golden Gate Highway & Bridge District re: status of public records search	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/6/2024	Travis Close	0.3	\$850	\$255	Draft response to SamTrans asking for status update on response to public records request for wheelchair boarding & securement policies	Discovery (Non-Deposition)
3/7/2024	Guy Wallace	0.7	\$1,350	\$945	revise and edit draft letter from MTJ to Rutner re Defendants' obligation to provide supplemental production of documents and data	Communications With Opposing Counsel
3/7/2024	Guy Wallace	0.5	\$1,350	\$675	com's with JGT; BBK; MTJ re meet and confer efforts re class list disputes; Defendants' non-production of data for staffing analyses; preparation for deposition of Michael Johnson re FSP	Discovery (Non-Deposition)
3/7/2024	Mark Johnson	1.3	\$1,150	\$1,495	research re RESNA and WC-19 standards, coms w/ T Close, L Castro, G Wallace re same and ordering same.	Experts (Including Retention)
3/7/2024	Rachel Steyer	0.2	\$750	\$150	reviewing production for billing records	Discovery (Non-Deposition)
3/7/2024	Travis Close	0.3	\$850	\$255	Email to co-counsel re: responses from transit agencies to PRA requests for wheelchair securement and boarding policies	Case Organization, Planning and Strategy
3/7/2024	Travis Close	0.5	\$850	\$425	Review, analyze, and propose revisions for draft joint letter brief re: ESI and supplementation	Case Organization, Planning and Strategy
3/7/2024	Travis Close	0.3	\$850	\$255	Email to team re: requesting updated Issue Register complaints before Michael Johnson deposition	Case Organization, Planning and Strategy
3/7/2024	Travis Close	1.3	\$850	\$1,105	Finish analysis of missing emergency plans for each of the remaining facilities at issue, as bounded by scope of plaintiffs' tenancy and dates of operation by Brookdale	Case Organization, Planning and Strategy
3/7/2024	Travis Close	0.8	\$850	\$680	Review and analyze BEST Spreadsheet standards for those related to transportation	Case Organization, Planning and Strategy
3/7/2024	Travis Close	0.8	\$850	\$680	Review and analyze docs under custodian Michael Johnson re: 2017 bus disposal/relocation efforts	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/7/2024	Travis Close	0.6	\$850	\$510	Review and analyze literature on safety of wheelchair occupants while on motor vehicles: RESNA's position on wheelchairs used as seats in motor vehilces	Case Organization, Planning and Strategy
3/7/2024	Travis Close	1.4	\$850	\$1,190	Depo prep -- continue drafting outline of 30b6 depo of Michael Johnson (corporate compliance, BEST Standards, FSP acknowledgement forms)	Depositions
3/7/2024	Travis Close	1.3	\$850	\$1,105	Depo prep -- continue drafting outline for deposition of Michael Johnson (equivalency standard & vehicle fleet changes)	Depositions
3/7/2024	Travis Close	1.3	\$850	\$1,105	Review and analyze additional records produced by GG Highway Transportation District re: accessibility polices; wheelchair securement; lift and ramp operations; restraint systems	Discovery (Non-Deposition)
3/8/2024	Guy Wallace	0.7	\$1,350	\$945	zoom with ER; JB; MJ; BBK; MTJ; RLS re various discovery disputes re resident depositions and files; class lists; supplementation of ESI; deposition schedule	Communications With Opposing Counsel
3/8/2024	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ; RLS re deposition of Michael Johnson; residents	Depositions
3/8/2024	Guy Wallace	0.8	\$1,350	\$1,080	zoom with GG; BBK; AX; AS; KS; BU; MTJ; TCC; RLS re motions to compel; depositions; status of meet and confer efforts re discovery issues	Discovery (Non-Deposition)
3/8/2024	Guy Wallace	1.4	\$1,350	\$1,890	legal research and analysis re Defendants' duty to refrain from communicating with members of the FSP class; preparation of outline of letter re same	Misc. Research
3/8/2024	Guy Wallace	1.3	\$1,350	\$1,755	preparation of outline of MTC letter brief re Defendants' failure to produce supplemental ESI and documents; com's with MTJ re same	Other Motions
3/8/2024	Guy Wallace	0.9	\$1,350	\$1,215	revise and edit draft MTC re unproduced staffing data; com's with BU; MTJ re same	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/8/2024	Mark Johnson	0.7	\$1,150	\$805	team zoom call w/ Grunfeld, Wallace, Bien-Kahn, Xu, Umpierre, Close, Steyer, Spiegel, Edmundson re outstanding discovery motions, declarant depositions and resident files; proposals re supplemental responses to Carlson rogs.	Case Organization, Planning and Strategy
3/8/2024	Mark Johnson	2.6	\$1,150	\$2,990	review document production for docs referencing fleet management team, other FSP related documents; coms w/ R Bonner (.1) re anomalies with docs	Depositions
3/8/2024	Mark Johnson	0.4	\$1,150	\$460	review docs pertaining to Plaintiffs Stiner retrieved by R Steyer and coms re same	Discovery (Non-Deposition)
3/8/2024	Mark Johnson	0.9	\$1,150	\$1,035	zoom meet and confer mtg w/ Wallace, Bien-Kahn, Steyer, Bertino, Jacobsen, Rutner re class list motions, resident declarant depos and files, Plaintiff depositions, document production	Discovery (Non-Deposition)
3/8/2024	Mark Johnson	0.3	\$1,150	\$345	calls w/ GBW re follow up on meet and confer issues raised at MC w/ OC, including ESI searches and facts re burden, letter brief	Discovery (Non-Deposition)
3/8/2024	Mark Johnson	0.1	\$1,150	\$115	review email and WC19 reference from T Close and respond re same and Johnson depo outline.	Discovery (Non-Deposition)
3/8/2024	Mark Johnson	0.2	\$1,150	\$230	follow up w/ R Bonner and R Steyer re production of billing related docs for Stiner and Jestrabeck-Hart, review docs re same.	Discovery (Non-Deposition)
3/8/2024	Mark Johnson	0.5	\$1,150	\$575	review and analyze memos from Xu and Styer describing site inspections	Discovery (Non-Deposition)
3/8/2024	Mark Johnson	0.2	\$1,150	\$230	review email from OC re production of missing data; draft response re same seeking specifics; draft email to COC and experts re view and analysis of data	Discovery (Non-Deposition)
3/8/2024	Mark Johnson	0.1	\$1,150	\$115	review and respond to COC B Bien-Kahn emails re strategy for compromise on two class list motions	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/8/2024	Mark Johnson	0.2	\$1,150	\$230	review email from B Bien-Kahn and proposed addition to ltr brief re class list production and inquiry re same; respond w/ comment	Other Motions
3/8/2024	Mark Johnson	0.1	\$1,150	\$115	review draft ltr brief re production of complete staffing related data;	Other Motions
3/8/2024	Rachel Steyer	0.8	\$750	\$600	weekly zoom meeting with RBGG, BSU, GBW, MTJ, TCC to review and discuss outstanding tasks and assignments	Case Organization, Planning and Strategy
3/8/2024	Rachel Steyer	0.3	\$750	\$225	call with former putative class member declarant providing case status update	Class Outreach and Contact
3/8/2024	Rachel Steyer	0.9	\$750	\$675	participated in meet and confer with OC to discuss various outstanding discovery disputes	Communications With Opposing Counsel
3/8/2024	Rachel Steyer	0.2	\$750	\$150	reviewing emails for earlier happy camper depo outline, transmitting to GBW for review	Depositions
3/8/2024	Rachel Steyer	0.2	\$750	\$150	response to GBW, MTJ, RAB re Stacia billing records	Discovery (Non-Deposition)
3/8/2024	Rachel Steyer	0.2	\$750	\$150	ongoing review of production for Stacia billing invoices/records	Discovery (Non-Deposition)
3/8/2024	Rachel Steyer	2.1	\$750	\$1,575	ongoing review of ED docs in production	Discovery (Non-Deposition)
3/8/2024	Rachel Steyer	0.7	\$750	\$525	completing and reviewing site inspection memo	Discovery (Non-Deposition)
3/8/2024	Rachel Steyer	0.2	\$750	\$150	reviewing AX Brookhurst site inspection memo	Discovery (Non-Deposition)
3/8/2024	Travis Close	0.3	\$850	\$255	Email to Doug Cross re literature on WC19 and request to schedule telephone call	Case Organization, Planning and Strategy
3/8/2024	Travis Close	0.3	\$850	\$255	Email to team re: helpful FAQ on WC19 regarding denial of access to transit	Case Organization, Planning and Strategy
3/8/2024	Travis Close	1.4	\$850	\$1,190	Depo prep -- research WC19 standard, compatibility with powerchairs/scooters, safety issues, updates, and relationship with access provided under disability laws	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/8/2024	Travis Close	0.8	\$850	\$680	Team meeting with GBW, MTJ, RLS, and co-counsel re: scheduled depositions, subpoenas, court reporter concerns	Case Organization, Planning and Strategy
3/8/2024	Travis Close	0.3	\$850	\$255	Review and analyze revised draft joint letter brief re: production of transportation subclass	Case Organization, Planning and Strategy
3/8/2024	Travis Close	1.7	\$850	\$1,445	Research user manuals of powerchairs & electric scooters for info on use while riding transit	Depositions
3/8/2024	Travis Close	1.4	\$850	\$1,190	Depo prep -- continue drafting outline for Michael Johnson deposition (Vehicle acquisition)	Depositions
3/9/2024	Guy Wallace	2.2	\$1,350	\$2,970	preparation and drafting of outline of MTC re supplementation re ESI and documents; review and analysis of meet and confer correspondence re same	Other Motions
3/10/2024	Guy Wallace	1.2	\$1,350	\$1,620	preparation and drafting of MTC re supplementation of ESI and limited categories of documents previously produced	Other Motions
3/10/2024	Mark Johnson	1.5	\$1,150	\$1,725	review D search terms for supp ESI and compare to Ps proposed search terms; prepare comparison document; draft email to COC and proposed email to OC re same	Discovery (Non-Deposition)
3/11/2024	Guy Wallace	4.8	\$1,350	\$6,480	preparation and drafting of MTC re Defendants' failure to produce supplemental ESI and documents	Other Motions
3/11/2024	Guy Wallace	1.7	\$1,350	\$2,295	preparation and drafting of MTC re supplementation of ESI and documents for Plaintiffs Stiner and Jestrabek-Hart	Other Motions
3/11/2024	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of draft two page MTC re benchmark formula; com's with MTJ re revisions to same	Other Motions
3/11/2024	Guy Wallace	0.9	\$1,350	\$1,215	preparation of MTC re supplementation re ESI and document production; review and analysis of prior drafts and incorporation into further draft	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/11/2024	Mark Johnson	0.1	\$1,150	\$115	finalize and send email to OC re problems with revised proposed search terms.	Discovery (Non-Deposition)
3/11/2024	Mark Johnson	0.1	\$1,150	\$115	email exchanges w/ Thornton, Marks, Peters re D's new staffing data production	Discovery (Non-Deposition)
3/11/2024	Mark Johnson	0.1	\$1,150	\$115	review email from T Close re changes in inventory of Brookdale facilities.	Discovery (Non-Deposition)
3/11/2024	Mark Johnson	0.4	\$1,150	\$460	email exchanges w/ OC E Rutner re production of names of ED, alleged burden of identifying same	Discovery (Non-Deposition)
3/11/2024	Mark Johnson	0.2	\$1,150	\$230	email exchanges w/ OC E Rutner re custodians related to fleet services email address, review and send exemplar doc re same.	Discovery (Non-Deposition)
3/11/2024	Mark Johnson	0.1	\$1,150	\$115	review email from OC Jacobsen re procedure for gathering text messages, email to R Bonner re same.	Discovery (Non-Deposition)
3/11/2024	Mark Johnson	0.7	\$1,150	\$805	call w/ G Wallace re strategy on and revisions to letter brief re benchmark formula	Other Motions
3/11/2024	Mark Johnson	3.8	\$1,150	\$4,370	re-work brief to ltr brief re mtn to compel benchmarks; review docs, prior briefing, declaration and communications w/ OC for same	Other Motions
3/11/2024	Mark Johnson	1.7	\$1,150	\$1,955	revise ltr brief re benchmark formula based on discussion w/ G Wallace	Other Motions
3/11/2024	Rachel Steyer	5.2	\$750	\$3,900	ongoing review of ED docs/production	Discovery (Non-Deposition)
3/11/2024	Rachel Steyer	0.3	\$750	\$225	reviewing BBK site inspection memo	Discovery (Non-Deposition)
3/11/2024	Rachel Steyer	0.2	\$750	\$150	reviewing MTJ draft letter brief re benchmark formula	Discovery (Non-Deposition)
3/11/2024	Rachel Steyer	0.3	\$750	\$225	reviewing notes/spreadsheet of name plaintiff resident files	Discovery (Non-Deposition)
3/11/2024	Travis Close	1.4	\$850	\$1,190	Facility search & analysis - update on tracking status of current and former Brookdale facilities (Alhmabra - Murrieta)	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/11/2024	Travis Close	1.3	\$850	\$1,105	Facility search & analysis - update on tracking status of current and former Brookdale facilities (Murrieta - Yorba Linda)	Case Organization, Planning and Strategy
3/11/2024	Travis Close	0.3	\$850	\$255	Email to team & co-counsel re: update on current status of brookdale facilities	Case Organization, Planning and Strategy
3/11/2024	Travis Close	0.3	\$850	\$255	Review and analyze memo from inspection at Brookhurst facility by AXU	Case Organization, Planning and Strategy
3/11/2024	Travis Close	0.4	\$850	\$340	Review and analyze memo drafted by RLS memorializing last week's inspection at Tracy facility	Case Organization, Planning and Strategy
3/11/2024	Travis Close	0.3	\$850	\$255	Review and analyze memo by BBK (co-counsel) after inspection of Fountaingrove facility	Case Organization, Planning and Strategy
3/11/2024	Travis Close	1.3	\$850	\$1,105	Further research of scooter/electric wheelchair manuals promoting transit access & acknowledging accessibility laws & regs	Case Organization, Planning and Strategy
3/11/2024	Travis Close	1.3	\$850	\$1,105	Depo prep -- continue drafting outline for Johnson, Michael 30b6 deposition (safety, exceptions to FSP)	Case Organization, Planning and Strategy
3/11/2024	Travis Close	0.8	\$850	\$680	Depo prep -- Review and analyze emails concerning exceptions applied to the scooter prohibition rule for the FSP	Discovery (Non-Deposition)
3/12/2024	Guy Wallace	1.8	\$1,350	\$2,430	prepare for and participate in meet and confer with ER; JB; MJ; BBK; MTJ; RLS re various discovery issues	Communications With Opposing Counsel
3/12/2024	Guy Wallace	0.6	\$1,350	\$810	com's with BBK; MTJ; RLS re results of meet and confer with Defendants	Discovery (Non-Deposition)
3/12/2024	Guy Wallace	0.7	\$1,350	\$945	com's with JT; MTJ re assessment and other data that has not been produced by Defendants; preparation of staffing analyses and expert reports re same	Experts (Including Retention)
3/12/2024	Guy Wallace	0.8	\$1,350	\$1,080	preparation and drafting of MTC re supplementation of ESI and documents	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/12/2024	Guy Wallace	0.5	\$1,350	\$675	revise and edit draft letter to Defendants re supplementation issues; com's with MTJ re same	Other Motions
3/12/2024	Guy Wallace	1.3	\$1,350	\$1,755	analysis of and com's with CJH; MTJ re trial strategy and preparation of individual claims for trial	Trial and Pretrial Preparation
3/12/2024	Mark Johnson	0.5	\$1,150	\$575	follow-up call w/ Wallace, Steyer Bien-Kahn re OC meet and confer on discovery issues and positions re same.	Case Organization, Planning and Strategy
3/12/2024	Mark Johnson	0.7	\$1,150	\$805	calls (x3) w/ G Wallace re case management, summary judgment and trial; evidence and arguments to be made by Defendants.	Case Organization, Planning and Strategy
3/12/2024	Mark Johnson	0.1	\$1,150	\$115	email exchange w/ R Stiner re depo scheduling and prep	Depositions
3/12/2024	Mark Johnson	0.2	\$1,150	\$230	email to Bien-Kahn, Stilber, Wallace re Feaster depo, docs to be produced, decision whether to proceed on 3/20; review OC letter re document production.	Depositions
3/12/2024	Mark Johnson	1.4	\$1,150	\$1,610	zoom meet and confer session w/ OC Rutner, Bertino and COC Wallace, Steyer, B Bien-Kahn re multiple discovery issues including ESI, supplementation, depositions, data, benchmark formula, supplemental responses to Carlson rogs	Discovery (Non-Deposition)
3/12/2024	Mark Johnson	0.3	\$1,150	\$345	draft email to COC Marks, Thornton and to B Peters re meet and confer re data production for staffing analysis, Ds' position and strategy.	Discovery (Non-Deposition)
3/12/2024	Mark Johnson	0.2	\$1,150	\$230	review previously filed stip and order re production of class list and communication with putative class members; email to Steyer / Wallace re same.	Discovery (Non-Deposition)
3/12/2024	Mark Johnson	0.3	\$1,150	\$345	review and analyze draft letter brief re ESI and supplementation	Other Motions
3/12/2024	Mark Johnson	2.2	\$1,150	\$2,530	revise and add to draft declaration in support of letter brief on ESI and supplemental document production.	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/12/2024	Rachel Steyer	1.3	\$750	\$975	meet and confer with opposing counsel to review and discuss outstanding discovery items	Discovery (Non-Deposition)
3/12/2024	Rachel Steyer	0.5	\$750	\$375	follow up zoom with BBK, GBW, MTJ to review and discuss meet and confer	Discovery (Non-Deposition)
3/12/2024	Rachel Steyer	0.2	\$750	\$150	response to AX and AS re Bates range for depos	Discovery (Non-Deposition)
3/12/2024	Travis Close	0.2	\$850	\$170	Email to team re: updated on purchased RESNA materials	Case Organization, Planning and Strategy
3/12/2024	Travis Close	1.1	\$850	\$935	Research RESNA WC-4 (sections 10 and 19) for info on situations where wheelchair strength is required during normal use	Case Organization, Planning and Strategy
3/12/2024	Travis Close	1.3	\$850	\$1,105	Review and analyze Brookdale's policies related to use of seatbelts for passengers	Case Organization, Planning and Strategy
3/12/2024	Travis Close	0.4	\$850	\$340	Call with LEC re: follow up on collection of of WC-19 related materials	Case Organization, Planning and Strategy
3/12/2024	Travis Close	0.9	\$850	\$765	Review and analyze purchased RESNA materials for info on proper wheelchair securement, device design, and compliance with federal laws	Case Organization, Planning and Strategy
3/12/2024	Travis Close	1.6	\$850	\$1,360	Depo prep -- continue drafting outline of Michael Johnson deposition (resident complaints)	Depositions
3/12/2024	Travis Close	1.2	\$850	\$1,020	Depo prep -- continue drafting outline of Michael Johnson deposition (insurance requirements)	Depositions
3/12/2024	Travis Close	0.7	\$850	\$595	Review and analyze materials shared by doug cross re: standards for wheelchair marking & tether straps	Experts (Including Retention)
3/13/2024	Guy Wallace	1.2	\$1,350	\$1,620	com's with MTJ; RLS; RAB re Defendants' production of March 13; Defendants' letter of March 13; preparation of MTC re non-produced ESI and documents; deposition schedule	Discovery (Non-Deposition)
3/13/2024	Guy Wallace	1.3	\$1,350	\$1,755	review and analysis of Defendants' letter of March 13 re ESI and document production	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/13/2024	Guy Wallace	0.7	\$1,350	\$945	com's with BBK; MTJ; RLS; RAB re depositions; Defendants' recent document production; MTC re ESI and supplemental document production issues	Discovery (Non-Deposition)
3/13/2024	Mark Johnson	2.4	\$1,150	\$2,760	review and analyze docs related to San Ramon / N. Feaster for depo; download same	Depositions
3/13/2024	Mark Johnson	0.6	\$1,150	\$690	draft email to OC re rescheduling of Feaster depo and justification for same; emails to and from COC re background on scheduling depo	Depositions
3/13/2024	Mark Johnson	0.1	\$1,150	\$115	email to OC re any objections to M Johnson / 30(b)(6) depo notice.	Depositions
3/13/2024	Mark Johnson	0.1	\$1,150	\$115	review and respond to COC emails re site inspection issues and production of putative class list.	Discovery (Non-Deposition)
3/13/2024	Mark Johnson	0.1	\$1,150	\$115	email to Rutner, et al. re compromise position on supplemental rog responses seeking ED identities.	Discovery (Non-Deposition)
3/13/2024	Mark Johnson	0.6	\$1,150	\$690	call w/ G Wallace re issues raised by 16 pg letter from OC re ESI and supplementation.	Discovery (Non-Deposition)
3/13/2024	Mark Johnson	0.4	\$1,150	\$460	preliminary review of 16 pg letter from opposing counsel re ESI and document production.	Discovery (Non-Deposition)
3/13/2024	Mark Johnson	0.2	\$1,150	\$230	follow up call w/ G Wallace re Ds letter re ESI and document production.	Discovery (Non-Deposition)
3/13/2024	Mark Johnson	0.3	\$1,150	\$345	review metadata of recent production and emails w/ Wallace, Bonner re page numbers, documents for each custodian and total, page numbers	Discovery (Non-Deposition)
3/13/2024	Mark Johnson	1.2	\$1,150	\$1,380	finalize draft of ltr to OC re multiple discovery issues, responsive to ltr of 3/6	Discovery (Non-Deposition)
3/13/2024	Mark Johnson	0.1	\$1,150	\$115	pre-call w/ T Close re conference call w/ Doug Cross, issues related to scope of expertise, WC-19 RESNA standards	Experts (Including Retention)
3/13/2024	Mark Johnson	0.2	\$1,150	\$230	review and respond to J Thornton email re missing data and analysis; email w/ Wallace re same.	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/13/2024	Mark Johnson	1.1	\$1,150	\$1,265	work on ESI and supplementation letter brief and supporting declaration	Other Motions
3/13/2024	Mark Johnson	0.9	\$1,150	\$1,035	call w Doug Cross and T Close re expert issues related to FSP and WC-19, potential arguments from D; prep for depo of Michael Johnson	Trial and Pretrial Preparation
3/13/2024	Rachel Steyer	0.3	\$750	\$225	reviewing letter from OC re outstanding discovery disputes	Communications With Opposing Counsel
3/13/2024	Rachel Steyer	0.2	\$750	\$150	call with GBW to review question about docs for supplementation review	Discovery (Non-Deposition)
3/13/2024	Travis Close	0.5	\$850	\$425	Review and analyze parties' correspondence re: deposition dates proposed for staffing deponents, EDs, HWDs, etc.	Case Organization, Planning and Strategy
3/13/2024	Travis Close	1.5	\$850	\$1,275	Depo prep -- continue drafting outline of deposition of Michael Johnson (incident reporting, complaints)	Depositions
3/13/2024	Travis Close	1.5	\$850	\$1,275	Call with Doug Cross & MTJ re: depo preparation (michael Johnson), WC19 standard, how to advance our arguments, how to rebut Brookdale's likely defenses	Experts (Including Retention)
3/13/2024	Travis Close	0.6	\$850	\$510	Prep for call with expert Doug Cross (review his academic literature, recent cases, WC19 materials, and notes from previous calls)	Experts (Including Retention)
3/13/2024	Travis Close	0.3	\$850	\$255	Email to Doug cross re: materials in prep for michael johnson deposition and request for feedback	Experts (Including Retention)
3/14/2024	Guy Wallace	1.2	\$1,350	\$1,620	zoom with GG; JY; BBK; AX; MTJ; TCC re depositions of ED's; Michael Johnson; motion to compel re ESI and supplemental production of documents; staffing analysis; damages model	Discovery (Non-Deposition)
3/14/2024	Guy Wallace	0.5	\$1,350	\$675	com's with RLS re Defendants' production of documents since September 2023 and subject matters covered therein; depositions of resident declarants	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/14/2024	Guy Wallace	1.3	\$1,350	\$1,755	com's with RAB re analysis of Defendants' production of documents and ESI since 2021 and whether such productions covered events post 2020; review and analysis of spreadsheets describing Defendants' productions and that identify emails and attachments that post-date 2021	Discovery (Non-Deposition)
3/14/2024	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ re strategy and preparation for Feaster and Michael Johnson depositions; preparation of MTC re Defendants' failure to make an adequate production of ESI and documents	Discovery (Non-Deposition)
3/14/2024	Guy Wallace	0.9	\$1,350	\$1,215	legal research and analysis re Title III and the direct threat defense	Misc. Research
3/14/2024	Mark Johnson	0.5	\$1,150	\$575	call w/ G wallace re doc review, depos of EDs, docs produced re FSP, Johnson depo and D's position re legality of FSP.	Case Organization, Planning and Strategy
3/14/2024	Mark Johnson	1.2	\$1,150	\$1,380	team zoom call w/ Wallace, Close, Grunfeld, Bien-Kahn, Xu, Yelin re recent document production, depositions, redacted documents, damages, motions to compel	Case Organization, Planning and Strategy
3/14/2024	Mark Johnson	1.7	\$1,150	\$1,955	review and analyze newly produced docs for Niare Feaster depo; download some of same as potential exhibits; emails to COC re same.	Depositions
3/14/2024	Mark Johnson	0.7	\$1,150	\$805	partial review and analysis of docs from Michael Johnson re FSP; com w/ T Close re same.	Depositions
3/14/2024	Mark Johnson	1.6	\$1,150	\$1,840	draft correspondence to OC re Johnson, Feaster and Kamdar depos and related docs, inadequacy of searches, etc.	Depositions
3/14/2024	Mark Johnson	1.7	\$1,150	\$1,955	work on outline for Feaster deposition and identification of exhibits.	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/14/2024	Mark Johnson	0.2	\$1,150	\$230	review statutory language re direct threat under ADA and draft questions based on same for Johnson / 30(b)(6) depo.	Depositions
3/14/2024	Mark Johnson	0.3	\$1,150	\$345	review multiple emails from OC re document production, emails, depositions of EDs; draft email to COC re same and plan for review of docs, responding and position on depositions.	Discovery (Non-Deposition)
3/14/2024	Mark Johnson	0.2	\$1,150	\$230	call w/ G Wallace, joined by R Bonner re docs produced on 3/13 and analysis of post 2020 production.	Discovery (Non-Deposition)
3/14/2024	Mark Johnson	0.8	\$1,150	\$920	coms (x6) w/ G Wallace re review and adequacy of D document production, discovery, mtn to compel ESI,	Discovery (Non-Deposition)
3/14/2024	Rachel Steyer	0.2	\$750	\$150	call with GBW to review and discuss discovery production	Discovery (Non-Deposition)
3/14/2024	Travis Close	0.3	\$850	\$255	Email to team re: scope of ESI produced for Johnson missing dates we requested	Case Organization, Planning and Strategy
3/14/2024	Travis Close	0.2	\$850	\$170	Email to RAB re: new emergency manual produced missing pages	Case Organization, Planning and Strategy
3/14/2024	Travis Close	1.1	\$850	\$935	Review and analyze updated Emergency Manual produced; compare to previous versions to identify policy changes	Case Organization, Planning and Strategy
3/14/2024	Travis Close	0.6	\$850	\$510	Analysis of parties' communications re: time period of supplemental ESI to be covered	Case Organization, Planning and Strategy
3/14/2024	Travis Close	1.1	\$850	\$935	Depo prep - review and analyze new production - custodian Michael Johnson BKD3033726-BKD3033804 (1-36 of 348)	Discovery (Non-Deposition)
3/14/2024	Travis Close	1.1	\$850	\$935	Depo prep - review and analyze new production - custodian Michael Johnson BKD3033804-BKD3033906 (37-83 of 348)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/14/2024	Travis Close	1.2	\$850	\$1,020	Depo prep - review and analyze new production - custodian Michael Johnson BKD3034168-BKD3034248 (147-186 of 348)	Discovery (Non-Deposition)
3/14/2024	Travis Close	1.2	\$850	\$1,020	Depo prep - review and analyze new production - custodian Michael Johnson BKD3033907-BKD3034167 (84-146 of 348)	Discovery (Non-Deposition)
3/15/2024	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re deposition of Michael Johnsons	Depositions
3/15/2024	Guy Wallace	1.4	\$1,350	\$1,890	review and analysis of Defendants' letter of 3/13/24 re ESI and document production issues; com's with MTJ; TCC; RLS and RAB re same	Discovery (Non-Deposition)
3/15/2024	Guy Wallace	0.3	\$1,350	\$405	com's with BU re Defendants' production of staffing data; remaining missing data re resident assessments; preparation of letter to Defendants re same	Discovery (Non-Deposition)
3/15/2024	Guy Wallace	0.8	\$1,350	\$1,080	legal research and analysis re Fleet Safety Policy and direct threat defense; com's with Jinny Kim and MTJ re same	Misc. Research
3/15/2024	Guy Wallace	1.1	\$1,350	\$1,485	com's with MTJ re settlement posture and analysis of settlement potential and likelihood of trial and appeal	Settlement
3/15/2024	Guy Wallace	2.8	\$1,350	\$3,780	analysis of Defendants' arguments on the merits re Plaintiffs' claims under the ADA; Unruh Act; CLRA; UCL and Elder Financial Abuse Act including both civil rights and consumer fraud theories	Trial and Pretrial Preparation
3/15/2024	Mark Johnson	1.5	\$1,150	\$1,725	review Account billing history for client Stiner, analyze timing and frequencies of increases and calculate totals of fees of different types, discounts.	Case Organization, Planning and Strategy
3/15/2024	Mark Johnson	1.2	\$1,150	\$1,380	coms w/ G Wallace re settlement, trial and appeal scenarios, implications of same, factors affecting likelihood of settlement	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/15/2024	Mark Johnson	0.4	\$1,150	\$460	review depo outline for T Ward as template for Feaster depo outlie	Depositions
3/15/2024	Mark Johnson	1.8	\$1,150	\$2,070	review and draft responses to multiple email coms re location of M Johnson deposition, factors supporting Emeryville v. Brentwood v. Fort Lauderdale; proposed recission of 30b6 agreement; coms w/ CO Wallace, Close, Yelin, Bien-Kahn re same and strategy	Depositions
3/15/2024	Mark Johnson	0.5	\$1,150	\$575	research case law re location of corporate deposition	Depositions
3/15/2024	Mark Johnson	0.2	\$1,150	\$230	coms w/ Client Stiner re meeting, text messages, supplemental responses to rogs	Discovery (Non-Deposition)
3/15/2024	Mark Johnson	0.1	\$1,150	\$115	coms w/ COC J Thornton and with OC Bertino re production of additional missing staffing related data.	Discovery (Non-Deposition)
3/15/2024	Mark Johnson	0.4	\$1,150	\$460	coms w/ G Wallace re docs identified for supplementation, ESI and docs produced by Ds post 2020; review emails from R Steyer and T Close w/ information re same	Discovery (Non-Deposition)
3/15/2024	Mark Johnson	0.8	\$1,150	\$920	work on drafting and revising ltr brief re supplementation	Other Motions
3/15/2024	Rachel Steyer	0.2	\$750	\$150	reviewing further communications between MTJ and OC re depo dates and productions	Communications With Opposing Counsel
3/15/2024	Rachel Steyer	1.4	\$750	\$1,050	reviewing categories of docs produced per OC's letter	Discovery (Non-Deposition)
3/15/2024	Rachel Steyer	0.2	\$750	\$150	response to GBW, TCC, MTJ, RAB re categories of docs supplemented	Discovery (Non-Deposition)
3/15/2024	Rachel Steyer	0.2	\$750	\$150	response to GBW, MTJ, TCC, RAB providing further info re category of docs produced	Discovery (Non-Deposition)
3/15/2024	Rachel Steyer	0.2	\$750	\$150	response to GBW, MTJ, RAB, TCC re additional categories of docs produced	Discovery (Non-Deposition)
3/15/2024	Travis Close	0.7	\$850	\$595	Analysis of vehicle fleet spreadsheets produced to-date and which data is included/omitted in columns	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/15/2024	Travis Close	0.2	\$850	\$170	Email to team re: reviewing defendants' claims of supplementation assignment	Case Organization, Planning and Strategy
3/15/2024	Travis Close	1.1	\$850	\$935	Depo prep - review and analyze new production - custodian Michael Johnson -BKD3034323-BKD3034421 (229-267 of 348)	Depositions
3/15/2024	Travis Close	1.4	\$850	\$1,190	Legal research re: proper location for 30b6 deposition and factors to consider	Depositions
3/15/2024	Travis Close	1.6	\$850	\$1,360	Depo prep -- legal research re: burden on parties to meet and confer & re scope of topics covered in notice; penalties for failure to testify on noticed topics; impact of recent amendments to FRCP Rule 30	Depositions
3/15/2024	Travis Close	1.2	\$850	\$1,020	Depo prep - review and analyze new production - custodian Michael Johnson - BKD3034421-BKD3034467 (267-302 of 348)	Depositions
3/15/2024	Travis Close	1.2	\$850	\$1,020	Depo prep - review and analyze new production - custodian Michael Johnson - BKD3034467-BKD3034562 (302-348 of 348)	Depositions
3/15/2024	Travis Close	1.6	\$850	\$1,360	Analyze defendants' claims with regard to supplementation in categories addressing emergency evacuation materials	Discovery (Non-Deposition)
3/16/2024	Guy Wallace	1.4	\$1,350	\$1,890	review and analysis of Plaintiffs' list of documents to be supplemented (March 7 version); analysis of documents that would be useful as exhibits for the ED depositions re San Ramon and Scotts Valley	Depositions
3/16/2024	Mark Johnson	1.9	\$1,150	\$2,185	finalize draft of ltr brief on supplementation of docs and ESI; email to G Wallace re same	Other Motions
3/16/2024	Mark Johnson	0.1	\$1,150	\$115	com w/ G Wallace re ltr brief to compel supplementation of ESI, docs	Other Motions
3/17/2024	Guy Wallace	0.9	\$1,350	\$1,215	revise and edit draft MTC letter re ESI and supplemental production of documents	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/17/2024	Guy Wallace	2.2	\$1,350	\$2,970	analysis of potential settlement outcomes and probabilities of settlement and trial	Settlement
3/17/2024	Guy Wallace	0.7	\$1,350	\$945	analysis of and com's with MTJ re Plaintiffs' probabilities of establishing liability re transportation; access; and staffing claims (ADA and consumer fraud); nature of jury instructions	Trial and Pretrial Preparation
3/17/2024	Mark Johnson	0.9	\$1,150	\$1,035	prep for mtg w/ client re supplemental discovery responses	Discovery (Non-Deposition)
3/17/2024	Mark Johnson	2.2	\$1,150	\$2,530	mtg w/ client to review supplemental discovery	Discovery (Non-Deposition)
3/18/2024	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re preparation for Feaster and Stiner depositions	Depositions
3/18/2024	Guy Wallace	1.8	\$1,350	\$2,430	review and analysis of motion to compel supplemental production of documents and ESI; identification of further types of documents that could be eliminated from demand list; com's with MTJ; TCC; RLS re same	Other Motions
3/18/2024	Guy Wallace	0.8	\$1,350	\$1,080	com's with MTJ; TCC; RLS; RAB re preparation of MTC re supplementation of ESI and documents	Other Motions
3/18/2024	Guy Wallace	1.1	\$1,350	\$1,485	revise and edit draft declaration of MTJ in support of MTC letter re supplementation of ESI and documents	Other Motions
3/18/2024	Guy Wallace	1.3	\$1,350	\$1,755	review and analysis of pretrial preparation order from Judge Gilliam and deadlines re same; com's with MTJ; RLS; LEC re same (.5)	Trial and Pretrial Preparation
3/18/2024	Mark Johnson	0.6	\$1,150	\$690	call w/ G Wallace re ltr brief on supplementation and ESI, streamlining list of documents for supplementation; issue re redaction of Stiner texts; pre-trial deadlines, depos of EDs and Rubin re SA	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/18/2024	Mark Johnson	1.1	\$1,150	\$1,265	coms w/ G Wallace re discovery issues, mtn to compel supplemental production of docs and ESI, expert reports, trial-related issues, inspection, plaintiffs' supplemental discovery responses	Case Organization, Planning and Strategy
3/18/2024	Mark Johnson	0.1	\$1,150	\$115	coms w/ R Steyer and L Castro re depo documents and assistance with depositions.	Depositions
3/18/2024	Mark Johnson	0.7	\$1,150	\$805	coms w/ T Close and R Steyer re D production of ESI related to Johnson/30(b)(6) deposition; review sample of docs produced related to justifications for FSP	Depositions
3/18/2024	Mark Johnson	0.3	\$1,150	\$345	review and respond to email from A Spiegel re depo outlines for happy campers, preliminary review of same.	Depositions
3/18/2024	Mark Johnson	0.3	\$1,150	\$345	review edits from GBW re letter brief on supplementation of docs and ESI; review follow up email; make revisions to letter based on same; email to Wallace re same	Other Motions
3/18/2024	Mark Johnson	5.5	\$1,150	\$6,325	further revisions to letter brief re ESI / supplementation, finalize draft of supporting declaration, review and revise same based on comments from COC	Other Motions
3/18/2024	Rachel Steyer	0.2	\$750	\$150	reviewing production for latest service alignment docs	Discovery (Non-Deposition)
3/18/2024	Rachel Steyer	0.3	\$750	\$225	reviewing production for profit and loss statements	Discovery (Non-Deposition)
3/18/2024	Rachel Steyer	0.2	\$750	\$150	transmitting income statement to GBW, MTJ, TCC	Discovery (Non-Deposition)
3/18/2024	Rachel Steyer	0.5	\$750	\$375	further reviewing service alignment docs	Discovery (Non-Deposition)
3/18/2024	Rachel Steyer	0.2	\$750	\$150	response to GBW, MTJ, TCC re categories of docs produced	Discovery (Non-Deposition)
3/18/2024	Rachel Steyer	0.4	\$750	\$300	gathering docs and transmitting to GBW per request	Discovery (Non-Deposition)
3/18/2024	Rachel Steyer	0.2	\$750	\$150	reviewing revised list of categories for supplementation	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/18/2024	Rachel Steyer	0.3	\$750	\$225	reviewing MTJ draft decl. ISO letter brief to compel supplementation	Discovery (Non-Deposition)
3/18/2024	Rachel Steyer	0.2	\$750	\$150	reviewing pre-trial schedule calendar dates	Trial and Pretrial Preparation
3/18/2024	Travis Close	1.0	\$850	\$850	Supplementation categories -- analyze discovery requests made pertaining to each of 66 categories for joint letter brief (continued)	Case Organization, Planning and Strategy
3/18/2024	Travis Close	0.2	\$850	\$170	Email to team re: redundancy in category no. 60 for supplementation	Case Organization, Planning and Strategy
3/18/2024	Travis Close	0.4	\$850	\$340	Review and analyze examples of 12-month budget summary and spend down reports & send to team for analysis of supplementation needed	Case Organization, Planning and Strategy
3/18/2024	Travis Close	0.2	\$850	\$170	Email to MTJ, GBW re: plaintiff algarme complaining about prohibition on riding scooter in bus	Case Organization, Planning and Strategy
3/18/2024	Travis Close	0.6	\$850	\$510	Depo prep -- analyze & organize recent ESI produced under custodian Michael Johnson for inclusion in outline & depo	Depositions
3/18/2024	Travis Close	1.3	\$850	\$1,105	Create index of potential deposition exhibits for Johnson dep (Docs listed in 30b6 notice, Def's alleged local policies)	Depositions
3/18/2024	Travis Close	1.2	\$850	\$1,020	Depo prep -- continue analyzing & organizing potential depo exhibits for outline (Def's alleged local policies)	Depositions
3/18/2024	Travis Close	1.3	\$850	\$1,105	Depo prep -- continue analyzing & organizing potential depo exhibits for outline (emails)	Depositions
3/18/2024	Travis Close	2.3	\$850	\$1,955	Supplementation categories -- analyze discovery requests made pertaining to each of 66 categories for joint letter brief	Discovery (Non-Deposition)
3/19/2024	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re site inspection of San Ramon facility	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/19/2024	Guy Wallace	0.9	\$1,350	\$1,215	revise and edit draft MTC letter brief re supplementation of ESI and documents	Other Motions
3/19/2024	Guy Wallace	1.2	\$1,350	\$1,620	revise and edit further draft of declaration of MTJ re supplementation of ESI and documents	Other Motions
3/19/2024	Guy Wallace	2.2	\$1,350	\$2,970	revise and edit draft MTC re supplementation of ESI and documents; com's with MTJ; TCC; RLS; RAB re same and Defendants production of documents and ESI since 2021 (.9)	Other Motions
3/19/2024	Guy Wallace	0.4	\$1,350	\$540	review and analysis of draft letter from BU to Defendants' re staffing data that has not been produced and potential resolution of same; com's with BU re same	Other Motions
3/19/2024	Guy Wallace	1.2	\$1,350	\$1,620	review and analysis of J. Gilliam Order re trial preparation; analysis of strength of Plaintiffs' class and individual claims	Trial and Pretrial Preparation
3/19/2024	Mark Johnson	0.5	\$1,150	\$575	review and analyze D objections to notice of deposition; email Wallace, Close re same	Depositions
3/19/2024	Mark Johnson	8.4	\$1,150	\$9,660	attend and observe site inspection with J Mastin, Doug Anderson, K Launey, J Berton, Niare Feaster	Experts (Including Retention)
3/19/2024	Mark Johnson	0.4	\$1,150	\$460	confer w/ J Mastin after site inspection of San Ramon facility.	Experts (Including Retention)
3/19/2024	Mark Johnson	1.5	\$1,150	\$1,725	finish draft of ltr brief re ESI and document supplementation; prepare exhibits for same; revise and finish draft declaration iso same.	Other Motions
3/19/2024	Rachel Steyer	0.2	\$750	\$150	call with Wendy DeMello providing case status update	Class Outreach and Contact
3/19/2024	Rachel Steyer	0.5	\$750	\$375	reviewing defendants objections and response to amended 30b6 depo notice	Depositions
3/19/2024	Rachel Steyer	0.2	\$750	\$150	reviewing updated MTJ decl. and letter brief re supplementation	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/19/2024	Rachel Steyer	0.3	\$750	\$225	reviewing saved search of post-2021 emails	Discovery (Non-Deposition)
3/19/2024	Rachel Steyer	0.2	\$750	\$150	reviewing updated draft letter brief and MTJ decl. re supplementation	Discovery (Non-Deposition)
3/19/2024	Rachel Steyer	0.2	\$750	\$150	call with GBW to review ESI discovery and updates to letter brief	Discovery (Non-Deposition)
3/19/2024	Rachel Steyer	0.2	\$750	\$150	reviewing email from TCC analyzing Jeannette Algarne scooter emails	Discovery (Non-Deposition)
3/19/2024	Rachel Steyer	0.2	\$750	\$150	reviewing AX site inspection memo	Discovery (Non-Deposition)
3/19/2024	Travis Close	0.4	\$850	\$340	Call with GBW re: supplementation of emergency evacuation materiasl	Case Organization, Planning and Strategy
3/19/2024	Travis Close	0.2	\$850	\$170	Review and analyze letter served by co-counsel on Defendants re: missing staffing data	Case Organization, Planning and Strategy
3/19/2024	Travis Close	2.3	\$850	\$1,955	Draft summary memo of Jeanette Algarne's experienced being denied accessible transportation on the bus, based on emails produced and deposition testimony	Case Organization, Planning and Strategy
3/19/2024	Travis Close	0.3	\$850	\$255	email to team re: jeanette algarne's experienced being denied an exception under the FSP	Case Organization, Planning and Strategy
3/19/2024	Travis Close	1.2	\$850	\$1,020	Depo prep -- continue drafting michael johnson outline (exceptions to FSP)	Case Organization, Planning and Strategy
3/19/2024	Travis Close	1.6	\$850	\$1,360	Depo prep --- finish indexing emails for potential use in deposition	Depositions
3/19/2024	Travis Close	0.7	\$850	\$595	Review and analyze instances of the scooter manual analysis - for riding on the bus - captured in emails produced by Brookdale	Discovery (Non-Deposition)
3/19/2024	Travis Close	1.4	\$850	\$1,190	Edits to Attachment to draft letter re: supplementation (chart of 66/56 categories and corresponding RFPs)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/20/2024	Guy Wallace	3.1	\$1,350	\$4,185	preparation and drafting of letter to Defendants' re ethical obligations and limitations re ex parte communications with class members; revise and edit same to incorporate comments of co-counsel	Communications With Opposing Counsel
3/20/2024	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ; RLS re Defendants' recent production of documents and ESI; alleged "new" SA documents were previously produced and pre-date 2021	Discovery (Non-Deposition)
3/20/2024	Guy Wallace	0.7	\$1,350	\$945	com's with GG; MTJ re expert discovery and reports; Defendants' potential bases for Fleet Safety Policy and Plaintiffs' potential responses re same	Experts (Including Retention)
3/20/2024	Guy Wallace	2.6	\$1,350	\$3,510	legal research and analysis re ex parte communications with Fleet Safety Policy class members	Misc. Research
3/20/2024	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ re Defendants' objections to exhibits to draft motion re supplementation and ESI; com's with MTJ re revisions re same and to draft declaration of MTJ	Other Motions
3/20/2024	Mark Johnson	0.3	\$1,150	\$345	review ltr from Ds re inspection protocols; com w/ G Wallace re same; review draft response to ltr	Case Organization, Planning and Strategy
3/20/2024	Mark Johnson	0.4	\$1,150	\$460	review draft ltr from G Wallace to Ds re communications with class members (.1); coms re same (.3)	Case Organization, Planning and Strategy
3/20/2024	Mark Johnson	0.7	\$1,150	\$805	calls w G Wallace re trial prep and remaining discovery issues, potential for settlement, trial team	Case Organization, Planning and Strategy
3/20/2024	Mark Johnson	2.5	\$1,150	\$2,875	review Stiner related docs in preparation for depo prep session for Rita Stiner.	Depositions
3/20/2024	Mark Johnson	0.2	\$1,150	\$230	coms w/ R Steyer and S Stiner re Luana Williams availablity and scheduling depo	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/20/2024	Mark Johnson	0.4	\$1,150	\$460	review and draft response to B Bien-Kahn re proposed depositions of former EDs; coms w/ G Wallace re same.	Depositions
3/20/2024	Mark Johnson	0.4	\$1,150	\$460	review email from OC re IT problems with doc production for Johnson depo, possible postponement of same; draft responsive email w/ questions; com w/ G Wallace re same; review email from T Close re same.	Depositions
3/20/2024	Mark Johnson	0.5	\$1,150	\$575	work on retrieving backup file from S Stiner phone and uploading and transmitting to R Bonner for identification and production of texts and call logs as part of supplemental production	Discovery (Non-Deposition)
3/20/2024	Mark Johnson	0.5	\$1,150	\$575	review photos from Mastin of San Ramon van and accessories, review Brookdale Fleet inventory; coms w/ T Close re same and possible consideration by P expert Doug Cross	Discovery (Non-Deposition)
3/20/2024	Mark Johnson	0.8	\$1,150	\$920	review docs for ltr brief iso benchmark formula, revise same	Other Motions
3/20/2024	Mark Johnson	0.7	\$1,150	\$805	review recently produced docs to identify or confirm additional doc custodians	Other Motions
3/20/2024	Mark Johnson	1.5	\$1,150	\$1,725	review and revise declaration and ltr brief iso supplementation of docs and ESI based on D email re excessive pages; coms w/ G Wallace re same; make further revisions to draft for possible back-up position.	Other Motions
3/20/2024	Rachel Steyer	2.9	\$750	\$2,175	review of and gathering documents for Rita Stiner depo prep	Depositions
3/20/2024	Travis Close	0.7	\$850	\$595	Review and analyze Def's objections to 30b6 depo notice	Case Organization, Planning and Strategy
3/20/2024	Travis Close	0.2	\$850	\$170	Review and analyze memo from AXU re: last week's hemet inspection	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/20/2024	Travis Close	2.4	\$850	\$2,040	Depo prep -- analyze docs referenced in outline & synchronize with index of potential exhibits	Case Organization, Planning and Strategy
3/20/2024	Travis Close	0.2	\$850	\$170	Review and analyze photos taken of bus/van at San Ramon facility at yesterday's inspection	Case Organization, Planning and Strategy
3/20/2024	Travis Close	0.2	\$850	\$170	Email to MTJ re: format of current fleet inventory for Johnson deposition	Case Organization, Planning and Strategy
3/20/2024	Travis Close	0.2	\$850	\$170	Email to MTJ, GBW re: postponing next week's deposition with Michael Johnson	Case Organization, Planning and Strategy
3/20/2024	Travis Close	0.8	\$850	\$680	Legal research re: whether Defs can communicate with class members about issues unrelated to the certified classes	Case Organization, Planning and Strategy
3/20/2024	Travis Close	1.8	\$850	\$1,530	Depo prep -- continue analyzing exhibits cited in outline & synchronizing with index of potential exhibits & documents in folders for printing	Depositions
3/20/2024	Travis Close	2.0	\$850	\$1,700	Depo prep -- finish analyzing exhibits cited in outline & synchronizing with index of potential exhibits & documents in folders for printing	Depositions
3/21/2024	Guy Wallace	0.3	\$1,350	\$405	revise and edit letter to Defendants re ex parte communications with class members	Communications With Opposing Counsel
3/21/2024	Guy Wallace	0.8	\$1,350	\$1,080	com's with MTJ; AX; RLS re depositions of Michael Johnson; current ED's and happy camper declarants	Depositions
3/21/2024	Guy Wallace	0.7	\$1,350	\$945	preparation of topics and questions re ED depositions	Depositions
3/21/2024	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of index of Defendants' document production since September 2023; com's with RLS; RAB re same and recent productions	Discovery (Non-Deposition)
3/21/2024	Mark Johnson	0.6	\$1,150	\$690	calls w/ G Wallace re Johnson depo scheduling, document production related to same, trial prep, depo prep for EDs and 30b6 depo on transportation.	Case Organization, Planning and Strategy
3/21/2024	Mark Johnson	2.8	\$1,150	\$3,220	depo prep mtg w/ Rita Stiner in San Ramon	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/21/2024	Mark Johnson	0.7	\$1,150	\$805	review 4 iterations of relevant portions of FSP policy; coms w/ T Close re same.	Depositions
3/21/2024	Mark Johnson	0.3	\$1,150	\$345	coms w/ R Bonner re S Stiner iphone text recovery, D recent production of FSP/Johnson related ESI, preliminary review of index of same.	Discovery (Non-Deposition)
3/21/2024	Rachel Steyer	1.3	\$750	\$975	gathering documents for MTJ for upcoming depo	Depositions
3/21/2024	Rachel Steyer	0.6	\$750	\$450	call with resident declarant to review and discuss depo logistics	Depositions
3/21/2024	Rachel Steyer	0.2	\$750	\$150	email to AX, KS, GBW, MTJ summarizing call with resident declarant	Depositions
3/21/2024	Rachel Steyer	0.3	\$750	\$225	reviewing resident declarant depo outline from AS	Depositions
3/21/2024	Rachel Steyer	0.5	\$750	\$375	reviewing emails/notes and production to identify pre/post 2021 response to 9th and 10th RFPs	Discovery (Non-Deposition)
3/21/2024	Rachel Steyer	0.2	\$750	\$150	call with GBW to further review and discuss index spreadsheet of production	Discovery (Non-Deposition)
3/21/2024	Rachel Steyer	0.2	\$750	\$150	reviewing draft letter brief re benchmark formula	Discovery (Non-Deposition)
3/21/2024	Travis Close	0.6	\$850	\$510	Email to MTJ re: additions/revisions made to outline; analysis of fleet safety policies; professional background additions & org chart; issues with alleged local policies	Case Organization, Planning and Strategy
3/21/2024	Travis Close	0.2	\$850	\$170	Review & analyze final version of letter to Defendants re: communications with class members	Case Organization, Planning and Strategy
3/21/2024	Travis Close	1.5	\$850	\$1,275	Analysis & index all versions of fleet safety policy produced by defendants; analyze changes between each policy with respect to scooter prohibitions	Depositions
3/21/2024	Travis Close	1.6	\$850	\$1,360	Depo prep -- make required changes to Johnson depo outline as suggested by Mark for reordering & additions	Depositions
3/21/2024	Travis Close	1.4	\$850	\$1,190	Analyze potential depo exhibits & organizer per order of outline and strategy by MTJ	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/21/2024	Travis Close	0.9	\$850	\$765	Continue analyzing potential depo exhibits & organizer per order of outline and strategy by MTJ	Depositions
3/21/2024	Travis Close	1.3	\$850	\$1,105	Review and analyze new production for docs related to upcoming deposition of Michael Johnson BKD3035171-BKD3035670 (1-231 of 847)	Depositions
3/22/2024	Guy Wallace	0.6	\$1,350	\$810	legal research and analysis re Defendants' potential arguments re commonality and barriers re access subclasses	Class Certification
3/22/2024	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ re Johnson deposition; ED depositions; Rubin deposition	Depositions
3/22/2024	Guy Wallace	0.8	\$1,350	\$1,080	zoom with AX; MTJ re preparation for Kamdar and other ED depositions; topics and potential questions re same	Depositions
3/22/2024	Guy Wallace	0.5	\$1,350	\$675	com's with RLS; TBS re deposition of happy camper resident; amended subpoena re same	Depositions
3/22/2024	Guy Wallace	1.2	\$1,350	\$1,620	preparation of potential topics and questions re ED depositions	Depositions
3/22/2024	Guy Wallace	1.2	\$1,350	\$1,620	zoom with GG; JY; BBK; AX; AS; KS; MTJ; JAU; TCC; RLS re depositions of happy campers; ED depositions; Fleet Safety Policy; preparation of expert reports; document analysis	Discovery (Non-Deposition)
3/22/2024	Guy Wallace	0.9	\$1,350	\$1,215	com's with JY; MTJ re potential expert re risks of transfer and health implications re pressure sores and falls	Experts (Including Retention)
3/22/2024	Guy Wallace	0.6	\$1,350	\$810	com's with BU; MTJ re expert reports re staffing experts	Experts (Including Retention)
3/22/2024	Guy Wallace	1.3	\$1,350	\$1,755	revise and edit draft MTC re labor benchmark formula	Other Motions
3/22/2024	Jennifer Bybee	1.3	\$925	\$1,203	Zoom call with co-counsel re site inspections, etc.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/22/2024	Mark Johnson	1.2	\$1,150	\$1,380	litigation team mtg w/ Wallace, Grunfeld, Close, Steyer, Stilber, Xu, Bien-Kahn, Siegal, Edmundson, Bybee re expert reports, inspections, depositions of Brookdale employees and residents	Case Organization, Planning and Strategy
3/22/2024	Mark Johnson	0.3	\$1,150	\$345	calls (x2) w/ G Wallace re risk of falls from transferring and from encountering barriers, including discussion re same in expert reports.	Case Organization, Planning and Strategy
3/22/2024	Mark Johnson	0.8	\$1,150	\$920	video conference w/ G Wallace and Amy Xu re strategy for depo exam of EDs of Scotts Valley and San Ramon.	Depositions
3/22/2024	Mark Johnson	0.2	\$1,150	\$230	coms w client and w/ COC re availability of San Ramon declarant for depo	Depositions
3/22/2024	Mark Johnson	0.4	\$1,150	\$460	email exchanges w/ OC Bertino re rescheduling of Johnson depo; proposed extension of deadline for related expert reports; confer w/ G Wallace re same; com w/ L Castro re rescheduling depo.	Depositions
3/22/2024	Mark Johnson	0.2	\$1,150	\$230	draft email to Ed Steinfeld re expert on safety issues associated with transfers out of mobility devices.	Experts (Including Retention)
3/22/2024	Mark Johnson	1.2	\$1,150	\$1,380	review potential exhibits and draft declaration for possible inclusion with letter brief on benchmark formula, coms w/ R Steyer and G Wallace re same; revise letter brief based on comments from Steyer, Wallace, finalize and send via email to OC	Other Motions
3/22/2024	Rachel Steyer	1.3	\$750	\$975	weekly meeting with RBGG, GBW, MTJ, TCC, JUB re outstanding tasks and assignments	Case Organization, Planning and Strategy
3/22/2024	Rachel Steyer	0.4	\$750	\$300	reviewing and cite checking MTJ letter brief re benchmark	Discovery (Non-Deposition)
3/22/2024	Travis Close	0.8	\$850	\$680	Depo prep -- analyze fleet inventories for completeness; email same to MTJ & brief analysis on equivalent services defense	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/22/2024	Travis Close	0.5	\$850	\$425	Review, analyze, and propose revisions to draft letter to Def's re: communications with class members	Case Organization, Planning and Strategy
3/22/2024	Travis Close	0.2	\$850	\$170	Review and analyze further revised version by GBW of draft letter brief re: benchmark formula	Case Organization, Planning and Strategy
3/22/2024	Travis Close	1.3	\$850	\$1,105	Weekly meeting with MTJ, GBW, RLS, and co-counsel re: deposition strategy, inspection summaries, expert reports, trial preparation	Case Organization, Planning and Strategy
3/22/2024	Travis Close	0.2	\$850	\$170	Email to GBW and GCG re: updated engagement letter for June Kailes	Case Organization, Planning and Strategy
3/22/2024	Travis Close	0.2	\$850	\$170	Email to RAB re: request for link to send photos to co-counsel	Case Organization, Planning and Strategy
3/22/2024	Travis Close	1.2	\$850	\$1,020	Review and analyze new production for docs related to upcoming deposition of Michael Johnson BKD3035670-BKD3036121 (231-457 of 847)	Depositions
3/22/2024	Travis Close	1.1	\$850	\$935	Review and analyze new production for docs related to upcoming deposition of Michael Johnson BKD3036622-BKD3037132 (682-847 of 847)	Depositions
3/22/2024	Travis Close	0.6	\$850	\$510	Review, analyze, and propose revisions to draft joint letter brief seeking benchmark formula	Discovery (Non-Deposition)
3/22/2024	Travis Close	1.3	\$850	\$1,105	Review and analyze new production for docs related to upcoming deposition of Michael Johnson BKD3036121-BKD3036622 (457-682 of 847)	Discovery (Non-Deposition)
3/24/2024	Guy Wallace	1.7	\$1,350	\$2,295	preparation of goals, topics and questions re ED depositions (Kamdar and Feaster)	Depositions
3/24/2024	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re schedule on Michael Johnson deposition; stipulation re same and schedule re rebuttal reports and close of expert discovery re same	Depositions
3/24/2024	Guy Wallace	0.4	\$1,350	\$540	com's with BU re Rule 26 expert reports of Dr. Flores and Dale Schroyer	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/24/2024	Guy Wallace	0.3	\$1,350	\$405	com's with Dr. Steinfeld and MTJ re risks associated with transfer	Experts (Including Retention)
3/24/2024	Mark Johnson	0.5	\$1,150	\$575	call w/ G Wallace re Transporation depo and extension of deadline for expert reports and expert discovery, impact on other deadlines, strategy.	Case Organization, Planning and Strategy
3/24/2024	Mark Johnson	1.5	\$1,150	\$1,725	review Stiner texts for supplemental document production.	Discovery (Non-Deposition)
3/24/2024	Mark Johnson	0.1	\$1,150	\$115	review and respond to email from Ed Steinfeld re expert on transferring	Experts (Including Retention)
3/24/2024	Mark Johnson	1.4	\$1,150	\$1,610	draft stip re extending deadline for expert disclosure; revise same after call w/ G Wallace re same and pre-trial schedule; circulate w/ email to COC	Other Motions
3/25/2024	Guy Wallace	2.7	\$1,350	\$3,645	preparation of topics and questions for Kamdar and Feaster depositions; com's with AX; MTJ re same (.2)	Depositions
3/25/2024	Guy Wallace	2.8	\$1,350	\$3,780	review and analysis of Defendants' opposition to Plaintiffs' motion to compel supplemental production of documents and ESI; com's with MTJ; RLS re same (.9)	Other Motions
3/25/2024	Mark Johnson	0.1	\$1,150	\$115	text exchange w/ R Stiner re deposition scheduling and location/format	Depositions
3/25/2024	Mark Johnson	0.2	\$1,150	\$230	email exchanges w/ J Bertino re scheduling of M Johnson depo and related document production, stip for partial extension of expert deadlines	Depositions
3/25/2024	Mark Johnson	0.1	\$1,150	\$115	email exchange w/ A Xu, R Steyer re reports available for ED depo	Depositions
3/25/2024	Mark Johnson	0.4	\$1,150	\$460	call w/ G Wallace re progress on supplemental responses for Plaintiff Stiner, review of her texts, her experience w/ Brookdale, Rita Stiner depo	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/25/2024	Mark Johnson	0.3	\$1,150	\$345	com w/ R Bonner, J Maher re review of S Stiner text msgs for supplemental production; draft instructions of same and recording results.	Discovery (Non-Deposition)
3/25/2024	Mark Johnson	3.2	\$1,150	\$3,680	review S Stiner text msges with nieces, uncle and others for supplemental document production.	Discovery (Non-Deposition)
3/25/2024	Mark Johnson	2.6	\$1,150	\$2,990	review text msges of S Stiner w/ counsel and prepare notes for supplemental responses to rogs	Discovery (Non-Deposition)
3/25/2024	Mark Johnson	0.3	\$1,150	\$345	revise and finalize stipulation re partial extension of expert deadlines; coms w/ COC re same.	Experts (Including Retention)
3/25/2024	Mark Johnson	0.9	\$1,150	\$1,035	calls w/ G Wallace re Ds section of letter brief on supplementation, issues raised and points to make in response..	Other Motions
3/25/2024	Mark Johnson	0.3	\$1,150	\$345	review and analyze D section of ltr brief re supplementation and ESI	Other Motions
3/25/2024	Rachel Steyer	1.0	\$750	\$750	attended depo	Depositions
3/25/2024	Rachel Steyer	0.3	\$750	\$225	reviewing co-counsel site inspection memo	Discovery (Non-Deposition)
3/25/2024	Rachel Steyer	0.3	\$750	\$225	reviewing defendants' portion of letter brief re supplementation	Discovery (Non-Deposition)
3/25/2024	Rachel Steyer	0.2	\$750	\$150	call with GBW to review and discuss discovery letter brief	Discovery (Non-Deposition)
3/25/2024	Rachel Steyer	0.2	\$750	\$150	looking up transcript citations, transmitting to GBW, MTJ, TCC, RAB	Discovery (Non-Deposition)
3/25/2024	Travis Close	0.8	\$850	\$680	Review, analyze, and provide comments on Def's portion of joint letter brief re: ESI supplementation	Case Organization, Planning and Strategy
3/25/2024	Travis Close	0.9	\$850	\$765	Review, analyze, and propose editions to draft ED template depo outline re: emergency evacuation, based on Kailes' earlier criteria for evaluating facility-based plans	Depositions
3/25/2024	Travis Close	0.2	\$850	\$170	Review and analyze draft stip and order re: extension of expert disclosure deadline	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/25/2024	Travis Close	2.4	\$850	\$2,040	Research further literature on injuries related to wheelchair securement in paratransit vehicles	Experts (Including Retention)
3/25/2024	Travis Close	1.2	\$850	\$1,020	Research legislative history re: draft rulemaking of ADA nondiscrimination in transportation provisions and, specifically, equivalent facilitation	Experts (Including Retention)
3/26/2024	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ; AX re schedule on depositions; review and analysis of draft stipulation re deposition of Michael Johnson	Depositions
3/26/2024	Guy Wallace	0.9	\$1,350	\$1,215	com's with Marks; Thornton; BU; MTJ re preparation of expert reports of Dr. Flores; Schroyer; Dr. Jones; Dr. Belson	Experts (Including Retention)
3/26/2024	Guy Wallace	1.5	\$1,350	\$2,025	review and analysis of Defendants' opposition re motion for supplementation re documents and ESI; review of draft reply re same; com's with MTJ; RLS re same	Other Motions
3/26/2024	Guy Wallace	1.8	\$1,350	\$2,430	preparation and drafting of additional reply points for MTC re supplementation of documents and ESI; revise and edit draft reply	Other Motions
3/26/2024	Mark Johnson	0.2	\$1,150	\$230	calls w/ G Wallace re expert reports on staffing; ltr brief on mtn for supplementation.	Case Organization, Planning and Strategy
3/26/2024	Mark Johnson	0.2	\$1,150	\$230	coms w/ R Stiner and with OC re scheduling of deposition.	Depositions
3/26/2024	Mark Johnson	2.0	\$1,150	\$2,300	review docs produced by R Stiner for supplemental production.	Discovery (Non-Deposition)
3/26/2024	Mark Johnson	0.3	\$1,150	\$345	coms w/ R Bonner re review and production of documents from R Stiner and S Stiner for supplemental produciton.	Discovery (Non-Deposition)
3/26/2024	Mark Johnson	0.9	\$1,150	\$1,035	zoom call w/ Wallace, Umpierre, Marks and Thornton re expert reports from Flores, Schroyer, Jones, Belson	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/26/2024	Mark Johnson	0.4	\$1,150	\$460	review and analysis of D redline of draft stip re partial extension of expert deadlines; com w/ OC re acceptance / rejection of same	Experts (Including Retention)
3/26/2024	Mark Johnson	2.7	\$1,150	\$3,105	work on drafting reply section of ltr brief iso supplementation of ESI and doc production.	Other Motions
3/26/2024	Mark Johnson	1.7	\$1,150	\$1,955	further revisions to reply section of ltr brief re supplementation	Other Motions
3/26/2024	Rachel Steyer	0.7	\$750	\$525	reviewing draft of ED depo outline circulated by AX	Depositions
3/26/2024	Rachel Steyer	1.8	\$750	\$1,350	completing review of discovery index	Discovery (Non-Deposition)
3/26/2024	Rachel Steyer	0.2	\$750	\$150	reviewing production to try to answer MTJ/GBW questions for response to letter brief re supplementation	Discovery (Non-Deposition)
3/26/2024	Rachel Steyer	2.6	\$750	\$1,950	reviewing Stacia texts for production	Discovery (Non-Deposition)
3/26/2024	Rachel Steyer	0.2	\$750	\$150	reviewing defendants' portion to joint letter brief re benchmark formula	Discovery (Non-Deposition)
3/26/2024	Rachel Steyer	0.2	\$750	\$150	reviewing updated response/reply to joint letter brief re supplementation	Discovery (Non-Deposition)
3/26/2024	Travis Close	0.9	\$850	\$765	Review and analyze production of records received by AC Transit re: wheelchair securement and boarding policies, procedures, trainings	Case Organization, Planning and Strategy
3/26/2024	Travis Close	0.5	\$850	\$425	Review and analyze production by Rio Vista Delta Breeze of wheelchair securement, boarding, & training policies and procedures	Case Organization, Planning and Strategy
3/26/2024	Travis Close	0.8	\$850	\$680	Review and analyze additional records produced by Valley Transit Authority re: wheelchair securement, boarding, and training policies	Case Organization, Planning and Strategy
3/26/2024	Travis Close	1.2	\$850	\$1,020	Continue drafting outline for Doug Cross's Rule 26 report	Case Organization, Planning and Strategy
3/26/2024	Travis Close	0.3	\$850	\$255	Review and analyze memo re: Scotts Valley inspection from AS (co-counsel)	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/26/2024	Travis Close	0.3	\$850	\$255	Review & analyze revised joint letter brief re: benchmark formula with defendants' section & propose notes for reply	Discovery (Non-Deposition)
3/26/2024	Travis Close	1.7	\$850	\$1,445	Draft rule 26 report for June Kailes (criteria-based analysis)	Experts (Including Retention)
3/26/2024	Travis Close	1.1	\$850	\$935	Create chart for criteria-based analysis for June Kailes re: plaintiff-facility plans	Experts (Including Retention)
3/26/2024	Travis Close	1.3	\$850	\$1,105	Create chart of plaintiffs' allegations re: emergency evacuation complaints	Trial and Pretrial Preparation
3/27/2024	Guy Wallace	1.5	\$1,350	\$2,025	review and analysis of AX depo outline re Kamdar; preparation of redlined version of same	Depositions
3/27/2024	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of Defendants' opposition to MTC letter brief re benchmark formula; preparation of responsive points re same; com's with MTJ re same	Other Motions
3/27/2024	Mark Johnson	0.4	\$1,150	\$460	calls (x2) w/ G Wallace re supplementation mtn, benchmark mtn, Rubin deposition	Case Organization, Planning and Strategy
3/27/2024	Mark Johnson	0.1	\$1,150	\$115	call w/ R Bonner re production of Stiner text messages	Discovery (Non-Deposition)
3/27/2024	Mark Johnson	0.4	\$1,150	\$460	email exchanges w/ Ryan Bonner re supplemental Stiner document production..	Discovery (Non-Deposition)
3/27/2024	Mark Johnson	2.7	\$1,150	\$3,105	review additional docs from R Stiner and code for production, privilege redaction	Discovery (Non-Deposition)
3/27/2024	Mark Johnson	2.6	\$1,150	\$2,990	review S Stiner texts w/ R Stiner and identify texts for supp production	Discovery (Non-Deposition)
3/27/2024	Mark Johnson	0.3	\$1,150	\$345	revise draft stip re partial extension of expert deadlines; coms w/ OC, L Castro re same	Experts (Including Retention)
3/27/2024	Mark Johnson	0.3	\$1,150	\$345	calls (x2) w/ Wallace re stip for extension of time on expert reports, mtn re supplementation and ESI	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/27/2024	Mark Johnson	0.3	\$1,150	\$345	com w/ T Close re emails from EDs re FSP; review and analyze same and search for others to support statement in letter re ESI supplemental custodians.	Other Motions
3/27/2024	Mark Johnson	1.7	\$1,150	\$1,955	revise ltr brief on doc & ESI supplementation and supporting declaration; research docs and facts for same.	Other Motions
3/27/2024	Rachel Steyer	5.7	\$750	\$4,275	ongoing review and gathering of labor detail reoprts for upcoming ED depo	Depositions
3/27/2024	Rachel Steyer	0.2	\$750	\$150	response to JT and DM re reviewing and double checking dates of LDRs	Discovery (Non-Deposition)
3/27/2024	Rachel Steyer	0.7	\$750	\$525	reviewing MTJ declaration and letter brief re supplementation	Discovery (Non-Deposition)
3/27/2024	Travis Close	0.6	\$850	\$510	Updates & revisions to PRA request tracking database for recent materials received re: wheelchair securement	Case Organization, Planning and Strategy
3/27/2024	Travis Close	0.7	\$850	\$595	Review and analyze transit securement & boarding policies produced by Santa Rosa CityBus in response to PRA requests	Case Organization, Planning and Strategy
3/27/2024	Travis Close	0.3	\$850	\$255	Review and analyze additional records produced by San Mateo County Transit District (SamTrans) re: wheelchair boarding and securement policies, procedures, trainings	Case Organization, Planning and Strategy
3/27/2024	Travis Close	0.2	\$850	\$170	Review and analyze revised version of stip and order re: extension of expert deadline for defendant's changes and plaintiffs' further changes	Case Organization, Planning and Strategy
3/27/2024	Travis Close	0.2	\$850	\$170	Email to GCG, GBW re: follow up on June Kailes' amended consultation agreement	Case Organization, Planning and Strategy
3/27/2024	Travis Close	1.8	\$850	\$1,530	Continue outlining opening report for Doug Cross	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/27/2024	Travis Close	0.7	\$850	\$595	Analyze examples of fleet safety policy enforcement where michael johnson is not copied on the email	Case Organization, Planning and Strategy
3/27/2024	Travis Close	0.6	\$850	\$510	Review and analyze draft deposition outline of Dimple Kampdar by AX (co-counsel)	Depositions
3/27/2024	Travis Close	1.2	\$850	\$1,020	Reply to inquiries for further analysis from Doug Cross re: photos of San Ramon accessible vehicle	Experts (Including Retention)
3/27/2024	Travis Close	1.8	\$850	\$1,530	Continue drafting outline of opening expert report for Doug Cross; send to GBW for review	Experts (Including Retention)
3/28/2024	Guy Wallace	0.7	\$1,350	\$945	prepare for and participate in zoom with potential expert re safety issues re transfers and FSP; com's with GG; MTJ re same	Experts (Including Retention)
3/28/2024	Guy Wallace	0.6	\$1,350	\$810	revise and edit Plaintiffs' reply section re MTC letter re benchmark formula	Other Motions
3/28/2024	Mark Johnson	0.1	\$1,150	\$115	review A Xu summary of depo of Dimple Kamdar	Depositions
3/28/2024	Mark Johnson	1.1	\$1,150	\$1,265	review S Stiner texts to brothers Eric and Greg for possible supplementation of doc production.	Discovery (Non-Deposition)
3/28/2024	Mark Johnson	0.2	\$1,150	\$230	email exchanges w/ R Bonner and R Steyer re review of Stiner texts for supplemental production.	Discovery (Non-Deposition)
3/28/2024	Mark Johnson	2.6	\$1,150	\$2,990	final review of S Stiner texts w/ R Stiner for production; final review of docs from R Stiner for production; coms w/ R Bonner re same, issues with vendor and redactions.	Discovery (Non-Deposition)
3/28/2024	Mark Johnson	0.4	\$1,150	\$460	review sample of questionable Stiner texts for production; coms w/ Bonner, Steyer and Wallace re same.	Discovery (Non-Deposition)
3/28/2024	Mark Johnson	3.8	\$1,150	\$4,370	draft reply section of ltr brief on benchmark formula; review prior pleadings and docs for same; coms w/ Wallace and Steyer re edits, revise ltr and transmit to OC	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/28/2024	Rachel Steyer	1.5	\$750	\$1,125	further review of and applying redactions to Stacia texts	Discovery (Non-Deposition)
3/28/2024	Rachel Steyer	0.3	\$750	\$225	reviewing and response to MTJ, GBW, RAB, JAM re defendants' RFPs and review of texts	Discovery (Non-Deposition)
3/28/2024	Rachel Steyer	0.2	\$750	\$150	reviewing defendant's IT declaration re benchmark letter brief	Discovery (Non-Deposition)
3/28/2024	Rachel Steyer	0.2	\$750	\$150	reviewing response portion of benchmark letter brief	Discovery (Non-Deposition)
3/28/2024	Rachel Steyer	0.2	\$750	\$150	respnose to MTJ, GBW, TCC, RAB, JAM re review and analysis of texts for responsiveness	Discovery (Non-Deposition)
3/28/2024	Travis Close	0.4	\$850	\$340	Review and analyze additional records produced by City of Petaluma re: wheelchair securement and boarding policies, procedures, and driver trainings	Case Organization, Planning and Strategy
3/28/2024	Travis Close	0.2	\$850	\$170	Review and analayze declaration of ANAND PARUVELLA iso Brookdale's section of letter brief re: service alignment algorithms	Case Organization, Planning and Strategy
3/28/2024	Travis Close	1.4	\$850	\$1,190	Review and analyze Brookdale's recent SEC filings (10-Ks, 10-Qs) for info on planned investment/divestment strategy, compliance with federal laws, centralization of operations	Case Organization, Planning and Strategy
3/28/2024	Travis Close	1.5	\$850	\$1,275	Review and analyze ESI produced by Brookdale mentioning Anand Paruvella (director of principal applications) related to service alignment algorithms, source code, or other interacting software	Case Organization, Planning and Strategy
3/28/2024	Travis Close	1.4	\$850	\$1,190	Continue drafting outline of Rule 26 opening report for June Kailes	Case Organization, Planning and Strategy
3/28/2024	Travis Close	1.4	\$850	\$1,190	Review, analyze, and summarize publications from JIK re: functional needs-based approach to emergency planning for expert report	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/28/2024	Travis Close	0.3	\$850	\$255	Call with JIK re: checking in on progress of expert report and scheduling time to talk further	Case Organization, Planning and Strategy
3/28/2024	Travis Close	0.2	\$850	\$170	Review and analyze draft reply to joint letter brief re: benchmark formula	Case Organization, Planning and Strategy
3/29/2024	Guy Wallace	0.4	\$1,350	\$540	meet and confer with ER; MJ; MTJ; TCC; RLS re potential compromises re MTC letters re supplementation; benchmark formula	Discovery (Non-Deposition)
3/29/2024	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re final compromises re MTC's re supplementation; benchmark formula	Discovery (Non-Deposition)
3/29/2024	Guy Wallace	0.8	\$1,350	\$1,080	com's with GG; BBK; AX; AS; MTJ; JAU; TCC; RLS re depositions; motions to compel; expert reports	Discovery (Non-Deposition)
3/29/2024	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re preparation for meet and confer with Defendants' re joint letters re supplementation and benchmark formula; deposition of Rita Stiner	Other Motions
3/29/2024	Jennifer Bybee	0.6	\$925	\$555	Zoom call with co-counsel re depositions and discovery	Discovery (Non-Deposition)
3/29/2024	Mark Johnson	1.0	\$1,150	\$1,150	team zoom mtg re depos, supplemental document production; motions to compel, experts and expert reports	Case Organization, Planning and Strategy
3/29/2024	Mark Johnson	0.2	\$1,150	\$230	call and text w/ R Stiner re depo prep, document production	Depositions
3/29/2024	Mark Johnson	0.1	\$1,150	\$115	coms w R Steyer re work on depo prep for R Stiner	Depositions
3/29/2024	Mark Johnson	0.4	\$1,150	\$460	review prior emails from OC and redactions v unredacted versions of S Stiner text msgs identified as non-responsive.	Discovery (Non-Deposition)
3/29/2024	Mark Johnson	0.1	\$1,150	\$115	draft email to OC responding to inquiry re redactions to texts	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/29/2024	Mark Johnson	2.0	\$1,150	\$2,300	review and analysis of D rogs and rpds for Stiner and responses and supp responses to same, compare to texts and other docs for responsiveness	Discovery (Non-Deposition)
3/29/2024	Mark Johnson	0.5	\$1,150	\$575	meet and confer zoom mtg w/ OC Rutner, Jacobsen, Wallace, Steyer re final compromises on mtns to compel doc/esi supplementation and benchmark formula	Other Motions
3/29/2024	Mark Johnson	1.7	\$1,150	\$1,955	further work on ltr briefs and supporting docs re supplmentation and benchmark formula, including reviewing and adding compromise language, minor edits and formatting; com w/ OC re same, com w/ staff and Wallace re filing	Other Motions
3/29/2024	Rachel Steyer	0.9	\$750	\$675	weekly zoom meeting with RBGG, GBW, MTJ, TCC to review and discuss outstanding tasks and assignments	Case Organization, Planning and Strategy
3/29/2024	Rachel Steyer	1.7	\$750	\$1,275	preparing and gathering labor detail reports for Niare Feaster depo	Depositions
3/29/2024	Rachel Steyer	2.0	\$750	\$1,500	gathering docs for Rita Stiner depo prep	Depositions
3/29/2024	Rachel Steyer	2.3	\$750	\$1,725	drafting depo prep outline for Rita Stiner	Depositions
3/29/2024	Rachel Steyer	0.4	\$750	\$300	meet and confer with OC, GBW, MTJ, TCC re outstanding discovery issues	Discovery (Non-Deposition)
3/29/2024	Travis Close	0.3	\$850	\$255	Review and analyze defendants' updated letter briefs with their compromise positions inserted	Case Organization, Planning and Strategy
3/29/2024	Travis Close	1.0	\$850	\$850	Weekly meeting with GBW, MTJ, RLS, & co-counsel re: trial preparation, expert reports, upcoming depositions, etc.	Case Organization, Planning and Strategy
3/29/2024	Travis Close	1.3	\$850	\$1,105	Review and analyze photos of plaintiffs' facilities in expert reports taken of emergency access and preparedness areas	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
3/29/2024	Travis Close	0.3	\$850	\$255	Review and analyze court's order granting injunctive relief	Case Organization, Planning and Strategy
3/29/2024	Travis Close	1.6	\$850	\$1,360	Analyze floor plans at plaintiffs' facilities for locations of stairwells, egress points, and compare to facility-based emergency plans	Case Organization, Planning and Strategy
3/29/2024	Travis Close	0.2	\$850	\$170	Email to JIK re: updated engagement letter	Case Organization, Planning and Strategy
3/29/2024	Travis Close	0.4	\$850	\$340	Meet and confer with MTJ, RLS, & defendants' counsel re: joint letter briefs (benchmark formula, supplemental, fleet safety policy)	Communications With Opposing Counsel
3/29/2024	Travis Close	0.5	\$850	\$425	Prep for 11am call with June Kailes (Review previous notes, prior declarations and draft report)	Experts (Including Retention)
3/29/2024	Travis Close	1.2	\$850	\$1,020	Call with JIK re: planning around experts reports	Experts (Including Retention)
3/31/2024	Mark Johnson	1.0	\$1,150	\$1,150	draft ltr to OC re Johnson depo duration and document production; email to COC re same; com w/ G Wallace re same.	Discovery (Non-Deposition)
4/1/2024	Mark Johnson	0.4	\$1,150	\$460	review email from OC re Stiner depo and doc production; com w/ G Wallace re same; draft response for review and send.	Discovery (Non-Deposition)
4/1/2024	Rachel Steyer	0.5	\$750	\$375	gathering documents and transmitting to MTJ and Rita Stiner for depo prep	Depositions
4/2/2024	Guy Wallace	0.4	\$1,350	\$540	com's with BU and TCC re expert reports; MTJ; RLS re depositions of Rita Stiner and Ann Wahl	Discovery (Non-Deposition)
4/2/2024	Mark Johnson	0.2	\$1,150	\$230	call w/ G Wallace re developments w/ Stiner depo, D doc request for expert materials, strategy related to same.	Case Organization, Planning and Strategy
4/2/2024	Mark Johnson	0.4	\$1,150	\$460	call (.3) and text exchange (.1) w/ Rita Stiner re depo cancellation and rescheduling, document review and prep session.	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/2/2024	Travis Close	0.9	\$850	\$765	Edits/additions to outline of Douglas Cross	Case Organization, Planning and Strategy
4/2/2024	Travis Close	0.2	\$850	\$170	Email to GBW re: outline of rule 26 report for review	Case Organization, Planning and Strategy
4/2/2024	Travis Close	2.4	\$850	\$2,040	Revisions to outline for rule 26 report on emergency evacuation	Case Organization, Planning and Strategy
4/2/2024	Travis Close	0.9	\$850	\$765	Review and analyze 30b6 deposition testimony on emergency evacuation	Case Organization, Planning and Strategy
4/2/2024	Travis Close	0.4	\$850	\$340	Review and analyze washington post article re: Brookdale's service alignment system & follow-up article in McKnight's	Case Organization, Planning and Strategy
4/2/2024	Travis Close	1.4	\$850	\$1,190	Review and analyze changed to 2020/2023 emergency manual (pages 70-end and 1-15)	Case Organization, Planning and Strategy
4/3/2024	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of depo outline re Zahner deposition; review and analysis of declaration re Small; preparation of additional questions re same; com's with AX re same	Depositions
4/3/2024	Guy Wallace	0.7	\$1,350	\$945	review and analysis of email from Marks re supporting anecdotal testimony from residents; com's with Marks; MTJ; RLS re same	Trial and Pretrial Preparation
4/3/2024	Mark Johnson	0.4	\$1,150	\$460	call w/ G Wallace re resident list and contact information, resident trial witnesses, declarants, further outreach efforts.	Case Organization, Planning and Strategy
4/3/2024	Mark Johnson	0.1	\$1,150	\$115	com w/ CO Marks and Thornton and Wallace re Rubin depo	Depositions
4/3/2024	Mark Johnson	0.2	\$1,150	\$230	email exchange w/ OC re Johnson depo duration and related document production.	Depositions
4/3/2024	Mark Johnson	0.2	\$1,150	\$230	text and email exchanges w/ Rita Stiner re depo and document review for depo	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/3/2024	Mark Johnson	0.3	\$1,150	\$345	review NOD for former SR ED, com w/ staff re same and POS, draft email cover to OC re depo and production of ESI for same	Depositions
4/3/2024	Mark Johnson	3.2	\$1,150	\$3,680	prepare possible depo exam questions for prep for R Stiner depo; review docs including complaint and S Stiner transcript for same; review Steyer outline related to same.	Depositions
4/3/2024	Mark Johnson	0.3	\$1,150	\$345	email exchanges w/ B Bien-Kahn re communication w/ OC re class list contact info, ED depositions; review doc request for resident contact info	Discovery (Non-Deposition)
4/3/2024	Mark Johnson	1.8	\$1,150	\$2,070	draft, revise and finalize 12th set of document requests re expert materials, review proposed edits from co-counsel.	Discovery (Non-Deposition)
4/3/2024	Mark Johnson	0.2	\$1,150	\$230	draft email to OC re production of expert materials and document requests re same.	Discovery (Non-Deposition)
4/3/2024	Mark Johnson	0.3	\$1,150	\$345	email to OC w/ ltr re Johnson depo; emails to and from Steyer re Stiner depo prep	Discovery (Non-Deposition)
4/3/2024	Mark Johnson	0.2	\$1,150	\$230	review doc requests from D re expert materials; draft email to COC re same and re actions to take in response.	Experts (Including Retention)
4/3/2024	Mark Johnson	0.2	\$1,150	\$230	review email from D Marks re witness outreach, draft email to R Steyer re same.	Trial and Pretrial Preparation
4/3/2024	Rachel Steyer	0.2	\$750	\$150	email to MTJ and GBW describing prior class outreach efforts	Class Outreach and Contact
4/3/2024	Rachel Steyer	0.2	\$750	\$150	drafting revisions to outgoing class mailer	Class Outreach and Contact
4/3/2024	Rachel Steyer	0.6	\$750	\$450	reviewing and updating draft class outreach intake script	Class Outreach and Contact
4/3/2024	Rachel Steyer	2.6	\$750	\$1,950	review of saved search re complaints	Discovery (Non-Deposition)
4/3/2024	Rachel Steyer	0.2	\$750	\$150	reviewing email from TCC providing outline of draft expert report	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/3/2024	Rachel Steyer	0.2	\$750	\$150	providing list to GBW and MTJ re declarants from six facilities	Misc. Research
4/3/2024	Travis Close	0.5	\$850	\$425	Review and analyze draft deposition outline for Kelli Zahner & template for happy camper depos	Case Organization, Planning and Strategy
4/3/2024	Travis Close	0.8	\$850	\$680	Review, analyze, and organize facility-level fire drills for brookhurst, hemet, san ramon	Case Organization, Planning and Strategy
4/3/2024	Travis Close	0.2	\$850	\$170	Email to RAB re: emergency drill coding assignment	Case Organization, Planning and Strategy
4/3/2024	Travis Close	0.4	\$850	\$340	Email to RAB re: instructions for fire drill document review assignment	Case Organization, Planning and Strategy
4/3/2024	Travis Close	0.2	\$850	\$170	Review, analyze, propose revisions to draft letter to class members re: updates on the case	Case Organization, Planning and Strategy
4/3/2024	Travis Close	0.4	\$850	\$340	Review, analyze, and propose revisions for draft twelfth set of RFPs re: photos from defendants' experts	Case Organization, Planning and Strategy
4/3/2024	Travis Close	0.4	\$850	\$340	Email to JIK re: instructions for review of facility plans & next steps for expert report	Case Organization, Planning and Strategy
4/3/2024	Travis Close	0.4	\$850	\$340	Review and analyze production of updated class member contact information for plaintiffs' facilities	Discovery (Non-Deposition)
4/3/2024	Travis Close	2.4	\$850	\$2,040	Review, analyze, and organize facility-level emergency planning forms for Brookhurst, Tracy, Fountaingrove, Scotts Valley, San Ramon facilities	Discovery (Non-Deposition)
4/4/2024	Guy Wallace	0.5	\$1,350	\$675	analysis of discovery and pretrial preparation tasks & schedule; com's with MTJ re same	Appeal
4/4/2024	Guy Wallace	0.3	\$1,350	\$405	com's with JGT; MTJ re Rubin deposition	Depositions
4/4/2024	Guy Wallace	0.4	\$1,350	\$540	com's with JGT; MTJ; BU; RLS re expert reports; time period for staffing analyses of the six facilities	Experts (Including Retention)
4/4/2024	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ re discovery and pretrial preparation	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/4/2024	Mark Johnson	0.7	\$1,150	\$805	call w/ G Wallace re pre-trial schedule and deadlines for expert disclosures, dispositive motions, briefing on class cert motion; depositions, staffing of same and strategy re expert reports and discovery.	Case Organization, Planning and Strategy
4/4/2024	Mark Johnson	1.8	\$1,150	\$2,070	review docs for Akindele Omole depo in Relativity, including LDR reports, internal coms, logbook reports.	Depositions
4/4/2024	Mark Johnson	0.2	\$1,150	\$230	call w/ R Stiner, niece re assistance in reviewing docs for depo	Depositions
4/4/2024	Rachel Steyer	0.9	\$750	\$675	reviewing and updating/fixing/organizing master class outreach list prepared by TRB for six facilities	Class Outreach and Contact
4/4/2024	Rachel Steyer	2.3	\$750	\$1,725	reviewing complaint hotline emails in production for potential new witness leads	Discovery (Non-Deposition)
4/4/2024	Rachel Steyer	2.7	\$750	\$2,025	reviewing depo transcripts for staffing and wait time discussions/citations for expert report	Discovery (Non-Deposition)
4/4/2024	Travis Close	1.2	\$850	\$1,020	Revisions & additions to outline for rule 26 report for Douglas Cross	Case Organization, Planning and Strategy
4/4/2024	Travis Close	0.4	\$850	\$340	Email to Doug Cross re: outline & instructions for rule 26 report	Case Organization, Planning and Strategy
4/4/2024	Travis Close	1.7	\$850	\$1,445	Begin drafting opening expert report for Douglas Cross (introduction, assignment)	Case Organization, Planning and Strategy
4/4/2024	Travis Close	0.4	\$850	\$340	Emails to RAB re: emergency drills coding assignment	Discovery (Non-Deposition)
4/4/2024	Travis Close	0.8	\$850	\$680	Finish comparing 2020 emergency manual to 2023 version & noting changes to policies	Experts (Including Retention)
4/4/2024	Travis Close	2.8	\$850	\$2,380	Continue drafting opening expert report for Douglas Cross (assignment, summary of opinions, background - coverage under regs, history of rulemaking, review of transit agency policies)	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/4/2024	Travis Close	0.7	\$850	\$595	Review and analyze recent publications by Douglas Cross re: wheelchair securement for info to be included in expert report	Experts (Including Retention)
4/5/2024	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ re noticing remaining depositions; schedule re same; preparation for same	Depositions
4/5/2024	Guy Wallace	0.9	\$1,350	\$1,215	zoom with GG; JY; BBK; AX; BU; MTJ; JAU; TCC; RLS re pending discovery motions; depositions of EDs and HWDs; Defendants' claimed use of contract labor for facility staffing; expert reports; Daubert motions	Discovery (Non-Deposition)
4/5/2024	Guy Wallace	1.2	\$1,350	\$1,620	analysis and com's with BU; MTJ re Defendants' alleged use of contract labor for staffing and potential impact on staffing analysis and potential responsive steps re same based on non-production of relevant, sought materials in this subject area	Experts (Including Retention)
4/5/2024	Guy Wallace	0.6	\$1,350	\$810	review and analysis of draft outline of expert report from TCC re expert report of Doug Cross and additional points re same	Experts (Including Retention)
4/5/2024	Jennifer Bybee	1.2	\$925	\$1,110	Zoom call with co-counsel re discovery, depositions, expert reports, planning, etc.	Discovery (Non-Deposition)
4/5/2024	Mark Johnson	0.4	\$1,150	\$460	review docket and prepare memo / com w/ COC re outstanding discovery ltr briefs.	Case / Document Administration
4/5/2024	Mark Johnson	1.2	\$1,150	\$1,380	team zoom mtg w/ Wallace, Grunfeld, Yelin, Bien- Kahn, Stilber, Umpierre, Close, Steyer, Edmundson, Bybee re expert reports, dispositive motions, motions to compel, mtn to quash, HWD reports, pretrial schedule, etc.	Case Organization, Planning and Strategy
4/5/2024	Mark Johnson	0.6	\$1,150	\$690	conference call w/ Wallace and Umpierre re contract labor issue for staffing analysis, LDR reports.	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/5/2024	Mark Johnson	0.5	\$1,150	\$575	revise pre-trial and discovery schedule, coms w/ RLS and GBW re same.	Case Organization, Planning and Strategy
4/5/2024	Mark Johnson	0.4	\$1,150	\$460	coms w/ RLS, Thornton, Wallace, Castro re timing of Rubin depo, preparing and service of notice of depo, review and comment on drafts of same.	Depositions
4/5/2024	Mark Johnson	0.3	\$1,150	\$345	coms w/ COC re depositions of HWDs, which to depositions, dates, notices	Depositions
4/5/2024	Mark Johnson	2.3	\$1,150	\$2,645	continue reviewing docs and drafting potential questions for R Stiner depo	Depositions
4/5/2024	Mark Johnson	2.5	\$1,150	\$2,875	coms w/ R Bonner re Relativity searches for docs related to contract labor; review samples of same; pull and circulate emails from production re use of contract labor and circulate to COC; identify contract labor reports from K Omole search of docs	Discovery (Non-Deposition)
4/5/2024	Mark Johnson	0.3	\$1,150	\$345	review docs related to emergency evacuation and fire drills, coms w/ Bonner, Close and Steyer re same	Discovery (Non-Deposition)
4/5/2024	Mark Johnson	0.2	\$1,150	\$230	review response from potential expert on wheelchair transfers, com w/ G Wallace re same; email to Steinfeld re same and copy of access board study	Experts (Including Retention)
4/5/2024	Rachel Steyer	1.2	\$750	\$900	weekly zoom meeting with RBGG, BSU, MTJ, GBW, JUB, TCC to review and discuss outstanding tasks and assignments	Case Organization, Planning and Strategy
4/5/2024	Rachel Steyer	0.2	\$750	\$150	reviewing and correcting draft NOD of Kelly Rubin	Depositions
4/5/2024	Rachel Steyer	4.9	\$750	\$3,675	ongoing review of depositions and discovery compiling cites for expert report	Discovery (Non-Deposition)
4/5/2024	Rachel Steyer	0.2	\$750	\$150	reviewing latest batch of docs produced	Discovery (Non-Deposition)
4/5/2024	Travis Close	1.6	\$850	\$1,360	Kailes expert report -- revisions to rule 26 outline	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/5/2024	Travis Close	1.3	\$850	\$1,105	Meeting with MTJ, GBW, RLS, and co-counsel re: upcoming depositions, expert report, pre-trial schedule	Case Organization, Planning and Strategy
4/5/2024	Travis Close	2.2	\$850	\$1,870	Continue drafting june kailes opening expert report (opinions, analysis)	Case Organization, Planning and Strategy
4/5/2024	Travis Close	0.4	\$850	\$340	Call with GBW re: strategy for doug cross expert report	Class Outreach and Contact
4/5/2024	Travis Close	1.8	\$850	\$1,530	Kailes expert report -- begin drafting rule 26 report (introducion, professional experience, assignment)	Experts (Including Retention)
4/8/2024	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ; TCC re depositions of Michael Johnson; Defendants' production of further documents re same; FSP and articles re transfer from Dr. Steinfeld	Depositions
4/8/2024	Mark Johnson	0.4	\$1,150	\$460	coms w/ RLS re document analysis and searches pertaining to Stiner assessments, PSPs, Exhibit Zs	Case Organization, Planning and Strategy
4/8/2024	Mark Johnson	0.4	\$1,150	\$460	call w/ G Wallace re review of recent production of M Johnson custodial files and D arguments on FSP claim, issues related to proof of Stiner individual claims.	Case Organization, Planning and Strategy
4/8/2024	Mark Johnson	1.4	\$1,150	\$1,610	review new documents produced by OC from Michael Johnson custodial files; identify and save relevant docs for depo exhibits; coms w/ T Close and G Wallace re same.	Depositions
4/8/2024	Mark Johnson	4.8	\$1,150	\$5,520	review docs related to Stacy / Rita Stiner; continue drafting potential questions for prep for depo	Depositions
4/8/2024	Mark Johnson	0.3	\$1,150	\$345	scan 3 articles from Steinfeld re wheelchair transfers; draft email to T Close re analysis of same.	Experts (Including Retention)
4/8/2024	Rachel Steyer	2.9	\$750	\$2,175	reviewing production and gathering docs for Rita Stiner depo	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/8/2024	Rachel Steyer	1.8	\$750	\$1,350	preparing spreadsheet tracking various PSPs added services over time for Stacia in prep for Rita Stiner depo	Depositions
4/8/2024	Rachel Steyer	0.8	\$750	\$600	completing review of depo transcripts and discovery re wait times for BSU	Discovery (Non-Deposition)
4/8/2024	Rachel Steyer	0.5	\$750	\$375	double checking production for BJH resident file docs	Discovery (Non-Deposition)
4/8/2024	Rachel Steyer	0.3	\$750	\$225	preparing email to GBW and BSU re review of depo transcripts and ROG responses re long wait times for expert report	Experts (Including Retention)
4/8/2024	Travis Close	1.6	\$850	\$1,360	Review and analyze three papers shared by expert re: clinical risks of wheelchair transfer	Case Organization, Planning and Strategy
4/8/2024	Travis Close	1.4	\$850	\$1,190	Review and analyze additional documents in Brookdale's latest production re: emergency evacuation and preparedness	Case Organization, Planning and Strategy
4/8/2024	Travis Close	1.1	\$850	\$935	Review and analyze Defendants' latest production of Michael Johnson ESI for inclusion in deposition outline, # BKD3038378-BKD3038508 (208-294 of 383)	Discovery (Non-Deposition)
4/8/2024	Travis Close	1.2	\$850	\$1,020	Review and analyze Defendants' latest production of Michael Johnson ESI for inclusion in deposition outline, # BKD3037337-BKD3037562 (67-129 of 383)	Discovery (Non-Deposition)
4/8/2024	Travis Close	0.6	\$850	\$510	Review and analyze Defendants' latest production of Michael Johnson ESI for inclusion in deposition outline, # BKD3037137-BKD3037337 (1-66 of 383)	Discovery (Non-Deposition)
4/8/2024	Travis Close	1.3	\$850	\$1,105	Review and analyze Defendants' latest production of Michael Johnson ESI for inclusion in deposition outline, # BKD3038508-BKD3038814 (294-383 of 383)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/8/2024	Travis Close	1.2	\$850	\$1,020	Review and analyze Defendants' latest production of Michael Johnson ESI for inclusion in deposition outline, # BKD3037562-BKD3037985 (129-208 of 383)	Discovery (Non-Deposition)
4/9/2024	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ re deposition of Stiner; Rubin; ED's; HWD's; results of meet and confer with Defendants re same	Depositions
4/9/2024	Guy Wallace	0.4	\$1,350	\$540	review and analysis of proposed approach to supplementation re named Plaintiffs' encounters with barriers; com's with JY; BBK re same	Discovery (Non-Deposition)
4/9/2024	Mark Johnson	0.2	\$1,150	\$230	call w/ G Wallace re results of meet and confer w/ OC re depos and strategy related to same	Case Organization, Planning and Strategy
4/9/2024	Mark Johnson	1.5	\$1,150	\$1,725	review account history for Stiner, assessment summaries, R Steyer chart re same. coms w/ Steyer, Bonner re assessments and account history	Case Organization, Planning and Strategy
4/9/2024	Mark Johnson	0.5	\$1,150	\$575	meet and confer w/ OC re Kamdar depo and other depos	Depositions
4/9/2024	Mark Johnson	0.8	\$1,150	\$920	call w R Stiner re depo prep, facts that may be asked about.	Depositions
4/9/2024	Mark Johnson	0.2	\$1,150	\$230	email exchanges w/ E Rutner re Omole representation and deposition, Rubin deposition date, meet and confer re Omole motion to quash	Depositions
4/9/2024	Mark Johnson	1.8	\$1,150	\$2,070	draft addition questions for R Stiner depo prep, coms w/ COC re same, review additions from R Steyer.	Depositions
4/9/2024	Mark Johnson	0.4	\$1,150	\$460	follow up call w /B Bien-Kahn re meet and confer and planning around depos; discovery and analysis related to damages issues.	Discovery (Non-Deposition)
4/9/2024	Mark Johnson	0.4	\$1,150	\$460	email exchanges w/ COC Xu, Yelin, Bien Kahn re issues relating to supplemental responses to interrogatories	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/9/2024	Mark Johnson	0.3	\$1,150	\$345	emails w/ Styer, Castro, Bonner re docs produced by R Stiner, assessments; email w/ Thornton re same	Discovery (Non-Deposition)
4/9/2024	Mark Johnson	0.1	\$1,150	\$115	review and respond to email from Jacobsen to the Court re pending motion for reconsideration.	Other Motions
4/9/2024	Mark Johnson	0.5	\$1,150	\$575	review article from WP re Brookdale staffing w/ email quotes from potential deponents; com w/ COC re same	Trial and Pretrial Preparation
4/9/2024	Rachel Steyer	0.5	\$750	\$375	reviewing MTJ draft depo prep outline, adding comments/suggestions	Depositions
4/9/2024	Rachel Steyer	0.6	\$750	\$450	preparing chart tracking personal service fees for Rita Stiner depo prep	Depositions
4/9/2024	Rachel Steyer	0.3	\$750	\$225	revising/preparing NOD for Kelly Rubin, searching for Niare Feaster NOD	Depositions
4/9/2024	Rachel Steyer	0.4	\$750	\$300	drafting/preparing edits to supplemental rogs	Discovery (Non-Deposition)
4/9/2024	Rachel Steyer	0.2	\$750	\$150	reviewing email from AS and attached communications/correspondence re whether to produce in response to RFPs	Discovery (Non-Deposition)
4/9/2024	Rachel Steyer	0.2	\$750	\$150	reviewing production with Stacia Stiner resident ID	Discovery (Non-Deposition)
4/9/2024	Travis Close	0.7	\$850	\$595	Draft reply to June Kailes re: using sequential bates numbers and dates to make inferences re: emergency preparedness plans at the facility level	Case Organization, Planning and Strategy
4/9/2024	Travis Close	0.5	\$850	\$425	Review and analyze recent facility evaluation and complaint investigation reports issued for Brookhurst, Tracy, San Ramon, and Scotts Valley facilities	Case Organization, Planning and Strategy
4/9/2024	Travis Close	0.8	\$850	\$680	Research evidence of unstageable wounds and other pressure sores at plaintiffs' facilities (listed in complaint investigation report for Brookhurst)	Case Organization, Planning and Strategy
4/9/2024	Travis Close	1.8	\$850	\$1,530	Kailes report - continue drafting rule 26 report (emergency manual, facility-based plans, drills)	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/9/2024	Travis Close	0.3	\$850	\$255	Review, analyze, and provide additions for draft deposition preparation questions for rita stiner	Case Organization, Planning and Strategy
4/9/2024	Travis Close	0.3	\$850	\$255	Review and analyze proposed approach by co-counsel re: supplementation to discovery of barriers encountered at the facilities	Case Organization, Planning and Strategy
4/9/2024	Travis Close	0.7	\$850	\$595	Continue drafting kailes rule 26 report (changes between 2020 and 2023 emergency manual	Case Organization, Planning and Strategy
4/9/2024	Travis Close	0.9	\$850	\$765	Analyze & organize evidence of 2017 power outage at Scotts Valley facility for Kailes report	Case Organization, Planning and Strategy
4/9/2024	Travis Close	1.4	\$850	\$1,190	Continue drafting kailes rule 26 report (emergency incidents - 2017 power outage)	Experts (Including Retention)
4/9/2024	Travis Close	0.8	\$850	\$680	Continue drafting kailes rule 26 report (emergency incidents - 2020 CZU Fire)	Experts (Including Retention)
4/10/2024	Guy Wallace	4.2	\$1,350	\$5,670	review and analysis of Rita Stiner declaration re class certification; Stacy Stiner declarations re class certification; Stacy Stiner account history report; MTJ questions and topics re preparation for Rita Stiner deposition; preparation of further GBW topics and questions re same; com's with MTJ re same (.9)	Depositions
4/10/2024	Mark Johnson	1.4	\$1,150	\$1,610	coms/ w Wallace, Styer, Umpierre re requirement to advise potential resident of rights; review statute and regulations re same; review and compare acknowledgments and statement, draft email re analysis	Case Organization, Planning and Strategy
4/10/2024	Mark Johnson	0.3	\$1,150	\$345	call w/ G Wallace re potential questions for R Stiner depo, facts related to same	Depositions
4/10/2024	Mark Johnson	2.0	\$1,150	\$2,300	depo prep call w/ R Stiner	Depositions
4/10/2024	Mark Johnson	0.3	\$1,150	\$345	call w/ OC Rutner, Jacobsen, Bertino re depos, motion to quash depos, schedule of other depos.	Depositions
4/10/2024	Mark Johnson	1.3	\$1,150	\$1,495	further call w/ R Stiner for depo prep	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/10/2024	Mark Johnson	0.2	\$1,150	\$230	coms w R Bonner re Stiner call logs, assignments, Stiner assessments, review of residency agreements	Discovery (Non-Deposition)
4/10/2024	Mark Johnson	1.0	\$1,150	\$1,150	Review and analysis of account history spreadsheet for Stiner converted by R Bonner; manipulate to calculate totals by category of payments and credits; draft email to G Wallace re same.	Trial and Pretrial Preparation
4/10/2024	Mark Johnson	0.2	\$1,150	\$230	call w/ G Wallace re results of analysis of Stiner account history, damages issues	Trial and Pretrial Preparation
4/10/2024	Rachel Steyer	0.2	\$750	\$150	email to GBW and MTJ re potential updates to SWCK Brookdale website page	Class Outreach and Contact
4/10/2024	Rachel Steyer	1.0	\$750	\$750	reviewing residency agreements for resident rights attachment	Discovery (Non-Deposition)
4/10/2024	Travis Close	0.3	\$850	\$255	Call & emails to Doug cross re: addressing comments on outline for rule 26 report	Case Organization, Planning and Strategy
4/10/2024	Travis Close	0.2	\$850	\$170	Email to MTJ re: help at today's meet and confer call	Case Organization, Planning and Strategy
4/10/2024	Travis Close	0.8	\$850	\$680	Review and analyze complaints by residents at Brookdale Scotts Valley after being evacuated to Redwood City & San Jose facilities during 2020 CZU fire	Case Organization, Planning and Strategy
4/10/2024	Travis Close	0.4	\$850	\$340	Draft summary from notes of today's call with Defendants and send to team	Case Organization, Planning and Strategy
4/10/2024	Travis Close	0.7	\$850	\$595	Call with Doug Cross re: general preparation for Rule 26 report	Case Organization, Planning and Strategy
4/10/2024	Travis Close	0.9	\$850	\$765	Call with Doug Cross re: items for review in outline of rule 26 report	Case Organization, Planning and Strategy
4/10/2024	Travis Close	0.4	\$850	\$340	meet and confer with defendants re: upcoming depositions and motion to quash	Communications With Opposing Counsel

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/10/2024	Travis Close	0.5	\$850	\$425	Review and analyze additions by Doug cross to outline of rule 26 report & respond to questions posed	Experts (Including Retention)
4/10/2024	Travis Close	2.1	\$850	\$1,785	Continue drafting Kailes rule 26 report -- 2020 CZU incident; 2017 Tubbs Fire incident	Experts (Including Retention)
4/10/2024	Travis Close	0.6	\$850	\$510	Email to JIK re: review of emergency events affecting Brookdale facilities	Experts (Including Retention)
4/11/2024	Guy Wallace	0.4	\$1,350	\$540	review and analysis of Defendants' draft letter brief re motion to quash depositions	Other Motions
4/11/2024	Mark Johnson	0.8	\$1,150	\$920	further review of Stiner PSP reports, assessment reports, pricing schedules to determining scope of incomplete production, coms w/ Bonner and Steyer re same; draft email to OC with attachments re same.	Case Organization, Planning and Strategy
4/11/2024	Mark Johnson	0.2	\$1,150	\$230	call w G Wallace re depo prep for R Stiner depo, D motion to quash depo subpoenas for former EDs.	Case Organization, Planning and Strategy
4/11/2024	Mark Johnson	0.4	\$1,150	\$460	coms w/ COC re depos, OC ltr re mtn to quash Squires depo, meet and confer availablity and strategy, alternative deponents.	Depositions
4/11/2024	Mark Johnson	3.0	\$1,150	\$3,450	prep session w/ R Stiner	Depositions
4/11/2024	Mark Johnson	2.3	\$1,150	\$2,645	review D section of ltr brief re mtn to quash depo subpoena for former EDs; begin drafting opposition section and legal research for same	Other Motions
4/11/2024	Rachel Steyer	0.2	\$750	\$150	reviewing defendants' portion of letter brief re motion to quash depos and accompanying declarations	Discovery (Non-Deposition)
4/11/2024	Travis Close	2.2	\$850	\$1,870	Continue drafting rule 26 report for june kailes (evidence of 2017 CZU Fire event)	Case Organization, Planning and Strategy
4/11/2024	Travis Close	0.4	\$850	\$340	Email to RLS re: key documents for consideration at trial related to emergency evacuation and transportation	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/11/2024	Travis Close	1.3	\$850	\$1,105	Analysis of key documents re: emergency evacuation & transportation for disclosure at trial	Case Organization, Planning and Strategy
4/11/2024	Travis Close	1.3	\$850	\$1,105	Review and analyze evidence from Brookdale's filings of employee experiences of evacuations	Case Organization, Planning and Strategy
4/11/2024	Travis Close	0.4	\$850	\$340	Review and analyze defendants' joint letter brief re: motion to quash depositions of Omole & Kumar & supporting declarations	Depositions
4/11/2024	Travis Close	0.2	\$850	\$170	Email to doug cross re: new access link to transit agency policei	Experts (Including Retention)
4/11/2024	Travis Close	1.6	\$850	\$1,360	Continue drafting kailes rule 26 report (2017 tubbs fire, facility photos, opinions - section 1)	Experts (Including Retention)
4/12/2024	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re deposition of Rita Stiner and results thereof	Depositions
4/12/2024	Guy Wallace	0.8	\$1,350	\$1,080	zoom with GG; BBK; AX; AS; KS; TCC; RLS re depositions; supplementation; expert reports	Discovery (Non-Deposition)
4/12/2024	Guy Wallace	0.3	\$1,350	\$405	com's with Mastin; Kennedy; Pettite re expert reports	Experts (Including Retention)
4/12/2024	Mark Johnson	0.5	\$1,150	\$575	calls w/ G Wallace w recap of R Stiner depo, ltr brief on former ED depos, supplementation of discovery, expert declarations	Case Organization, Planning and Strategy
4/12/2024	Mark Johnson	3.5	\$1,150	\$4,025	defend depo of Rita Stiner	Depositions
4/12/2024	Mark Johnson	1.5	\$1,150	\$1,725	depo prep and meeting w/ client Rita Stiner before and after depo and during lunch break	Depositions
4/12/2024	Mark Johnson	0.2	\$1,150	\$230	review Bien-Kahn draft email to OC re substitution of deponents and terms of agreement re same; com re same w/ proposed edits..	Discovery (Non-Deposition)
4/12/2024	Rachel Steyer	0.8	\$750	\$600	weekly zoom meeting with RBGG, GBW, TCC to review and discuss outstanding tasks and assignments	Case Organization, Planning and Strategy
4/12/2024	Rachel Steyer	0.6	\$750	\$450	reviewing revised drafts of supplemental rogs	Discovery (Non-Deposition)
4/12/2024	Rachel Steyer	0.7	\$750	\$525	reviewing Lexis people search for Shawn Cull info	Misc. Research

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/12/2024	Travis Close	2.4	\$850	\$2,040	Continue drafting Kailes rule 26 report -- Opinion, 1) Residents with Disabilities Not Involved in Planning for Emergencies at the Five Facilities, 2) The Facilities Did Not Keep Updated Plans, 3) Critical Details Missing Until Emergency Event	Case Organization, Planning and Strategy
4/12/2024	Travis Close	0.8	\$850	\$680	Meeting with GBW, RLS, and co-counsel (RBGG) re: upcoming depositions, damages, expert reports	Case Organization, Planning and Strategy
4/12/2024	Travis Close	1.3	\$850	\$1,105	Review and analyze evidence of emails contemporaneous with oct 9 Tubbs Fire event in Fountaingrove	Case Organization, Planning and Strategy
4/12/2024	Travis Close	1.2	\$850	\$1,020	Review & analysis summary of transit securement policies by Doug Cross; revise & incorporate into rule 26 report	Experts (Including Retention)
4/12/2024	Travis Close	0.4	\$850	\$340	Email to Doug cross re: draft of rule 26 report with Cross's additions	Experts (Including Retention)
4/12/2024	Travis Close	1.6	\$850	\$1,360	Continue drafting rule 26 report for Kailes, opinions - section 3) Emergency Needs of Residents with Disabilities Not Adequately Considered	Experts (Including Retention)
4/14/2024	Mark Johnson	2.3	\$1,150	\$2,645	work on draft of P section in opp to mtn to quash depos of Omole and Kumar; email to COC re same	Other Motions
4/15/2024	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re status of discovery and whether the May 1, 2024 fact discovery cut off can be met; potential steps re same	Discovery (Non-Deposition)
4/15/2024	Guy Wallace	0.7	\$1,350	\$945	com's with BU; MTJ; RAB re Defendants' use of contract labor and documents re same	Discovery (Non-Deposition)
4/15/2024	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of draft supplemental responses to Defendants' First Set of Interrogatories to Art Lindstrom	Discovery (Non-Deposition)
4/15/2024	Guy Wallace	0.9	\$1,350	\$1,215	com's with Waters re draft expert report; facilities reports	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/15/2024	Guy Wallace	0.4	\$1,350	\$540	review and analysis of draft of Flores Rule 26 report	Experts (Including Retention)
4/15/2024	Guy Wallace	0.6	\$1,350	\$810	com's with BU re draft expert report of Dr. Flores	Experts (Including Retention)
4/15/2024	Guy Wallace	2.2	\$1,350	\$2,970	review and analysis of draft opposition to Defendants' motion to quash depositions of EDs Kumar and Omele; revise and edit same; com's with BBK; MTJ re same (.5)	Other Motions
4/15/2024	Mark Johnson	0.4	\$1,150	\$460	call w/ G Wallace re Brookdale use of contract labor, docs quantifying same, implications for staffing analysis, discovery re same.	Case Organization, Planning and Strategy
4/15/2024	Mark Johnson	0.3	\$1,150	\$345	follow up call w/ G Wallace re D use of contract labor and B Umpierre comments re same and staffing analysis; strategy for reviewing docs and seeking docs related to same.	Case Organization, Planning and Strategy
4/15/2024	Mark Johnson	0.3	\$1,150	\$345	calls w/ G Wallace re pending discovery disputes, strategy for addressing inability to obtain discovery or rulings on discovery disputes, seeking extensions of deadlines, change in schedule	Case Organization, Planning and Strategy
4/15/2024	Mark Johnson	0.5	\$1,150	\$575	review docs related to labor costs, chart of accounts and org charts for depositions / trial prep	Case Organization, Planning and Strategy
4/15/2024	Mark Johnson	0.5	\$1,150	\$575	email exchanges w/ R Bonner, R Steyer, L Castro, T Close re searches for, review and organizing of docs and potential exhibits for Omole and Johnson depositions.	Depositions
4/15/2024	Mark Johnson	5.2	\$1,150	\$5,980	prep for Omole depo, including review of LD reports, emails and other docs; revision of depo outline.	Depositions
4/15/2024	Mark Johnson	0.3	\$1,150	\$345	call w/ G Wallace re edits to ltr brief on mtn to quash depositions.	Other Motions
4/15/2024	Mark Johnson	0.7	\$1,150	\$805	emails to and from COC re draft section of ltr brief re mtn to quash ED depositions; review and incorporate proposed edits and make additional changes; email to OC re same	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/15/2024	Mark Johnson	0.6	\$1,150	\$690	review docs related to contract labor expenses and coms w/ G Wallace, B Umpierre, R Bonner re same	Trial and Pretrial Preparation
4/15/2024	Rachel Steyer	3.8	\$750	\$2,850	reviewing deponent documents, updating depo outline	Depositions
4/15/2024	Rachel Steyer	0.2	\$750	\$150	call with GBW to review and discuss depo prep	Depositions
4/15/2024	Rachel Steyer	0.5	\$750	\$375	reviewing documents provided by social worker re Ann Wahl	Depositions
4/15/2024	Rachel Steyer	0.2	\$750	\$150	reviewing and editing MTJ circulated plaintiffs' portion of letter brief re motion to quash	Discovery (Non-Deposition)
4/15/2024	Travis Close	0.3	\$850	\$255	Review, analyze, and propose revisions to draft joint letter brief re: depositions of former executive directors at plaintiffs' facilities	Case Organization, Planning and Strategy
4/15/2024	Travis Close	0.4	\$850	\$340	Review, analyze additions & progress by Doug Cross on Rule 26 report	Case Organization, Planning and Strategy
4/15/2024	Travis Close	0.3	\$850	\$255	Email to Doug Cross re: progress on rule 26 reports	Case Organization, Planning and Strategy
4/15/2024	Travis Close	1.3	\$850	\$1,105	Depo prep -- review and analyze emails of Akindele Omole for this week's deposition	Depositions
4/15/2024	Travis Close	2.2	\$850	\$1,870	Continue drafting kailes report -- opinions 2) The Facilities Did Not Keep Updated Plans and 3) Critical Plan Details Missing Until Emergency Event	Experts (Including Retention)
4/15/2024	Travis Close	2.3	\$850	\$1,955	Continue drafting expert report for june kailes (Opinion - 3) fails to consider residents with disabilities in planning, 4) staffing too low during emergencies)	Experts (Including Retention)
4/16/2024	Guy Wallace	0.3	\$1,350	\$405	revise and edit draft of outreach letter; com's with RLS re same	Class Certification
4/16/2024	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re deposition of Omole; Defendants' motion to quash re same	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/16/2024	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of draft depo outline for HWD deponents from BBK; preparation of additional questions and topics re same; com's with BBK re same	Depositions
4/16/2024	Guy Wallace	0.9	\$1,350	\$1,215	revise and edit draft supplemental responses of Art Lindstrom to Defendants' First Set of Interrogatories	Discovery (Non-Deposition)
4/16/2024	Guy Wallace	1.1	\$1,350	\$1,485	revise and edit draft of Plaintiffs' Rule 26(e) supplement to their Initial Disclosures	Discovery (Non-Deposition)
4/16/2024	Guy Wallace	1.1	\$1,350	\$1,485	revise and edit draft supplemental interrogatory responses for Bernie Jestrabek-Hart (prepared by AX); com's with AX; BBK; JY; BU re same	Discovery (Non-Deposition)
4/16/2024	Guy Wallace	1.2	\$1,350	\$1,620	com's with Waters; Mastin; JAU re preparation of Rule 26 expert reports; facility reports for six facilities; review and analysis of prior declaration testimony	Experts (Including Retention)
4/16/2024	Guy Wallace	0.5	\$1,350	\$675	com's with PK; LP; BU; CJH re draft of Dr. Kennedy's damages report	Experts (Including Retention)
4/16/2024	Guy Wallace	0.7	\$1,350	\$945	legal research and analysis re damages under the Unruh Act for "each and every offense"	Misc. Research
4/16/2024	Guy Wallace	0.5	\$1,350	\$675	com's with GG; BU; MTJ re case schedule; potential approaches to obtaining additional time to complete discovery	Trial and Pretrial Preparation
4/16/2024	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re Rule 26 for Waters and Mastin	Experts (Including Retention)
4/16/2024	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re Rule 26 report drafts	Experts (Including Retention)
4/16/2024	Jennifer Bybee	2.1	\$925	\$1,943	Draft J. Mastin Rule 26 report	Experts (Including Retention)
4/16/2024	Jennifer Bybee	0.4	\$925	\$370	Draft Waters Rule 26 Report	Experts (Including Retention)
4/16/2024	Mark Johnson	0.6	\$1,150	\$690	review 4-month trend reports for analysis of contract labor costs and draft email with conclusions, comments re same.	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/16/2024	Mark Johnson	0.4	\$1,150	\$460	call w/ G Wallace re contract labor issues and strategy for seeking extension of deadlines based on pending unresolved discovery disputes and necessary docs and depos.	Case Organization, Planning and Strategy
4/16/2024	Mark Johnson	0.5	\$1,150	\$575	call w/ Umpierre, Wallace re contract labor cost analysis and relationship to staffing analysis.	Case Organization, Planning and Strategy
4/16/2024	Mark Johnson	0.2	\$1,150	\$230	draft email to client re account history, total payments by category, summary assessment reports.	Case Organization, Planning and Strategy
4/16/2024	Mark Johnson	0.4	\$1,150	\$460	draft email to OC re Omole deposition; review response and draft follow up re effect of subpoena.	Depositions
4/16/2024	Mark Johnson	0.5	\$1,150	\$575	research D claim that mtn to quash automatically stays depo; com w/ COC re same for response to OC	Depositions
4/16/2024	Mark Johnson	3.2	\$1,150	\$3,680	review and organize potential exhibits for Michael Johnson deposition; coms w/ T Close re certain exhibits; coms w/ L Castro re depo arrangements, shipping exhibits,	Depositions
4/16/2024	Mark Johnson	2.2	\$1,150	\$2,530	work on outline for M Johnson depo	Depositions
4/16/2024	Mark Johnson	0.4	\$1,150	\$460	review and analyze depo outline from B Bien-Kahn for HWD, draft email with suggestions for additional examination for same.	Depositions
4/16/2024	Rachel Steyer	1.7	\$750	\$1,275	travel from SF to Santa Cruz for deposition	Depositions
4/16/2024	Rachel Steyer	2.0	\$750	\$1,500	attending and taking deposition of resident declarant Ann Wahl	Depositions
4/16/2024	Rachel Steyer	1.9	\$750	\$1,425	return travel from Santa Cruz to San Francisco following completion of deposition of Ann Wahl	Depositions
4/16/2024	Rachel Steyer	1.0	\$750	\$750	reviewing residency agreements and preparing resident and responsible party contact info	Discovery (Non-Deposition)
4/16/2024	Travis Close	0.2	\$850	\$170	Email to GBW re: feedback on June Kailes outline	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/16/2024	Travis Close	0.9	\$850	\$765	Email to JIK re: responses to questions regarding rule 26 report assignments	Case Organization, Planning and Strategy
4/16/2024	Travis Close	0.6	\$850	\$510	Response to MTJ re: analysis of additional considerations and topics for the Michael Johnson outline	Case Organization, Planning and Strategy
4/16/2024	Travis Close	0.2	\$850	\$170	Email to team re: photos of newer expert reports to send to Kailes	Case Organization, Planning and Strategy
4/16/2024	Travis Close	1.7	\$850	\$1,445	Update index of potential exhibits for michael johnson outline with recently produced emails	Depositions
4/16/2024	Travis Close	0.2	\$850	\$170	Email to MTJ re: recent emails produced for Michael Johnson deposition	Depositions
4/16/2024	Travis Close	2.1	\$850	\$1,785	Depo prep -- add additional exhibits identified & associated questions to Michael Johnson outline for next week's deposition	Depositions
4/16/2024	Travis Close	0.4	\$850	\$340	Email to MTJ, GBW, LEC re: additional exhibits for michael johnson deposition & log of changes made to outline	Depositions
4/16/2024	Travis Close	0.2	\$850	\$170	Email to JIK re: evidence of power outage at Scotts Valley	Experts (Including Retention)
4/16/2024	Travis Close	0.5	\$850	\$425	Email to JIK reviewing literature regarding exposure risk of assisted living facilities and nursing homes to wildfires	Experts (Including Retention)
4/16/2024	Travis Close	0.2	\$850	\$170	Email to GBW, MTJ re: Kailes' progress on rule 26 reports	Experts (Including Retention)
4/16/2024	Travis Close	0.4	\$850	\$340	Compile versions of emergency manual & chart of changes made in newer version, send to JIK for review	Experts (Including Retention)
4/16/2024	Travis Close	0.4	\$850	\$340	Edits to Kailes Rule 26 report (criteria-based analysis)	Experts (Including Retention)
4/17/2024	Guy Wallace	0.6	\$1,350	\$810	com's with BBK; AS; MTJ re deposition of HWD; topics and questions re same	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/17/2024	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ; RLS re Defendants' incomplete production of account history reports for the named Plaintiffs	Discovery (Non-Deposition)
4/17/2024	Guy Wallace	1.3	\$1,350	\$1,755	com's with PK; LP; BU; MTJ re preparation of Rule 26 report re damages	Experts (Including Retention)
4/17/2024	Jennifer Bybee	1.6	\$925	\$1,480	Draft Water Rule 26 Report	Experts (Including Retention)
4/17/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re expert reports	Experts (Including Retention)
4/17/2024	Mark Johnson	0.3	\$1,150	\$345	meet and confer zoom w/ OC Jacobson, Rutner, Bertino and COC Wallace, Close re ltr brief on mtn to quash non-party depo subpoenas.	Depositions
4/17/2024	Mark Johnson	0.7	\$1,150	\$805	zoom call and emails w/ Bien Kahn, Yelin,Wallace re depo follow up of HWD, prposed additional questions for same	Depositions
4/17/2024	Mark Johnson	5.0	\$1,150	\$5,750	work on depo outline and review of exxhibits and potential exhibits for Michael Johnson depo	Depositions
4/17/2024	Mark Johnson	0.6	\$1,150	\$690	zoom call w/ Wallace, Steyer D failure to produce complete account histories for Plaintiffs; strategy for addressing same; review draft prposed email to OC re same	Discovery (Non-Deposition)
4/17/2024	Mark Johnson	0.4	\$1,150	\$460	draft email to Steyer / Wallace re categories of damages for Stiner,	Experts (Including Retention)
4/17/2024	Mark Johnson	0.4	\$1,150	\$460	review and analyze D reply section iso mtn to quash non-party depo subpoenas; review original ltr brief to check D representations re prior argument.	Other Motions
4/17/2024	Rachel Steyer	0.2	\$750	\$150	email to TRB re reviewing previous lists to identify any do not contact residents	Class Outreach and Contact
4/17/2024	Rachel Steyer	0.2	\$750	\$150	email to TRB, TBS, MTJ, GBW, RAB re preparing resident mailer	Class Outreach and Contact
4/17/2024	Rachel Steyer	0.2	\$750	\$150	email to RAB re reviewing residency agreements and compiling class list	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/17/2024	Rachel Steyer	0.2	\$750	\$150	draft email to GBW and MTJ to send to OC re production of account history reports	Communications With Opposing Counsel
4/17/2024	Rachel Steyer	0.3	\$750	\$225	revising draft email to OC to GBW and MTJ	Communications With Opposing Counsel
4/17/2024	Rachel Steyer	3.3	\$750	\$2,475	further review of residency agreements and updating contact information/class list	Discovery (Non-Deposition)
4/17/2024	Rachel Steyer	0.2	\$750	\$150	email to MTJ and GBW re account history report documents	Discovery (Non-Deposition)
4/17/2024	Rachel Steyer	0.3	\$750	\$225	zoom with GBW and MTJ to review and discuss outstanding account history reports	Discovery (Non-Deposition)
4/17/2024	Travis Close	0.4	\$850	\$340	Email to MTJ re: DOT/DOJ transportation regulations at issue and summary of legislative history surrounding same	Depositions
4/17/2024	Travis Close	0.3	\$850	\$255	Attend meet and confer with defendants re: upcoming depositions with former HWDs	Depositions
4/17/2024	Travis Close	0.3	\$850	\$255	Review and analyze Plaintiff's section & defendants' reply iso motion to quash depositions	Discovery (Non-Deposition)
4/17/2024	Travis Close	0.3	\$850	\$255	Email to JIK re: latest draft of rule 26 report & analysis	Experts (Including Retention)
4/17/2024	Travis Close	1.4	\$850	\$1,190	Draft criteria for analysis of plans to state requirements in HSC 1659.695 & send to JIK for review	Experts (Including Retention)
4/17/2024	Travis Close	0.2	\$850	\$170	Email to Doug Cross re: issue of photos being incorporated into draft report	Experts (Including Retention)
4/17/2024	Travis Close	1.6	\$850	\$1,360	Continue drafting kailes opening expert report (Criteria-based review of plans)	Experts (Including Retention)
4/17/2024	Travis Close	2.2	\$850	\$1,870	Review, analyze, and translate criteria-based review by Kailes to designated spreadsheet/exhibit	Experts (Including Retention)
4/17/2024	Travis Close	1.7	\$850	\$1,445	Review and analyze resident council meeting minutes at plaintiffs' facilities for concerns re emergency evacuation (Scotts Valley, Tracy, Fountaingrove)	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/18/2024	Guy Wallace	0.9	\$1,350	\$1,215	preparation of topics and questions for HWD depositions	Depositions
4/18/2024	Guy Wallace	2.7	\$1,350	\$3,645	preparation of topics and questions re HWD's depositions; review and analysis of draft depo outline re same; com's with BBK; AS; MTJ re same	Depositions
4/18/2024	Guy Wallace	0.7	\$1,350	\$945	zoom with AS; BBK; JY; MTJ re topics and questions for HWD depositions	Depositions
4/18/2024	Guy Wallace	0.3	\$1,350	\$405	com's with RLS; TBS re class outreach letter	Depositions
4/18/2024	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ re Defendants' changes to the FSP; preparation for deposition of Michael Johnson	Depositions
4/18/2024	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of Order from MJ Beeler re interrogatories; ED depositions; Rubin depo; com's with MTJ; RLS re same	Discovery (Non-Deposition)
4/18/2024	Guy Wallace	0.4	\$1,350	\$540	com's with BU re draft Rule 26 report of Dr. Flores	Experts (Including Retention)
4/18/2024	Guy Wallace	0.7	\$1,350	\$945	review and analysis of draft Rule 26 report of Kailes	Experts (Including Retention)
4/18/2024	Mark Johnson	0.7	\$1,150	\$805	call w/ GBW re new FSP policy rec'd from Ds; implication for Johnson depo, new line of questions re same; mootness analysis; ruling on rogs and ED depositions, meeting and conferring w/ OC re same; timing and strategy on objecting to ruling re ED depositions and Rubin	Case Organization, Planning and Strategy
4/18/2024	Mark Johnson	1.1	\$1,150	\$1,265	coms w/ G Wallace re ruling on rogs and depositions, challenging same to district court, Johnson depo, HWD depositions, Stiner care-related issues	Case Organization, Planning and Strategy
4/18/2024	Mark Johnson	0.3	\$1,150	\$345	coms w/ TCC, LEC re depo exhibits for Johnson / 30(b)(6) depo.	Depositions
4/18/2024	Mark Johnson	0.6	\$1,150	\$690	coms w/ Adrienne Spiegel re depo questions for SR HDW Jennifer Gordon Alvarez; analysis of Stiner issues re care	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/18/2024	Mark Johnson	5.7	\$1,150	\$6,555	work on Johnson depo outline and review of exhibits for same	Depositions
4/18/2024	Mark Johnson	0.4	\$1,150	\$460	email COC re D new FSP policy, summarizing same and implications	Discovery (Non-Deposition)
4/18/2024	Mark Johnson	0.3	\$1,150	\$345	review and analysis of MJ Beeler Order re interrogatories and depositions (mtn for reconsideration)	Other Motions
4/18/2024	Rachel Steyer	2.0	\$750	\$1,500	ongoing review of residency agreements and updating class contact list	Class Outreach and Contact
4/18/2024	Rachel Steyer	0.4	\$750	\$300	reviewing AS depo prep outline	Depositions
4/18/2024	Rachel Steyer	0.3	\$750	\$225	reviewing RFPs re request for resident file	Discovery (Non-Deposition)
4/18/2024	Rachel Steyer	0.2	\$750	\$150	response to GBW re review of resident files	Discovery (Non-Deposition)
4/18/2024	Travis Close	0.6	\$850	\$510	Email to JIK re: analysis and summary of state opportunities for intervention w/r/t deficient emergency plans	Case Organization, Planning and Strategy
4/18/2024	Travis Close	0.2	\$850	\$170	Email to MTJ re: expediting deposition transcript for Michael Johnson	Case Organization, Planning and Strategy
4/18/2024	Travis Close	0.4	\$850	\$340	Email to Doug Cross re: specific questions and input sought for next week's deposition of Michael Johnson	Case Organization, Planning and Strategy
4/18/2024	Travis Close	0.5	\$850	\$425	Review, analyze, organize all versions of Transportation Resource Guide; update outline of Johnson deposition to reference the most recent version	Depositions
4/18/2024	Travis Close	0.2	\$850	\$170	Email to MTJ re: questions from Doug Cross for the deponent in next week's deposition	Depositions
4/18/2024	Travis Close	0.2	\$850	\$170	Email to RLS re: updates to discovery tracking spreadsheet	Discovery (Non-Deposition)
4/18/2024	Travis Close	0.5	\$850	\$425	Draft email to June Kailes re: opportunity for on-site inspections through guest visits	Experts (Including Retention)
4/18/2024	Travis Close	0.4	\$850	\$340	Email to JIK re: analysis of emergency evacuation requirements under the Rehabilitation Act and CMS	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/18/2024	Travis Close	0.3	\$850	\$255	Email to JIK re: content of opening vs. rebuttal expert reports & sections to work on in opening report	Experts (Including Retention)
4/18/2024	Travis Close	1.4	\$850	\$1,190	Finish reviewing and analyze resident council meeting minutes from Fountaingrove and Brookhurst facilities re: emergency evacuation and planning concerns	Experts (Including Retention)
4/18/2024	Travis Close	2.2	\$850	\$1,870	Continue revising report of Douglas Cross according to his latest additions (Professional Background, Assignment, Legislative background)	Experts (Including Retention)
4/19/2024	Guy Wallace	1.6	\$1,350	\$2,160	review and analysis of Defendants' new FSP; preparation of topics and questions re same	Depositions
4/19/2024	Guy Wallace	1.1	\$1,350	\$1,485	legal research and analysis re ADA Title III and the direct threat defense	Depositions
4/19/2024	Guy Wallace	1.8	\$1,350	\$2,430	preparation of topics and questions for Michael Johnson deposition	Depositions
4/19/2024	Guy Wallace	0.9	\$1,350	\$1,215	zoom with GG; JY; BBK; AX; KS; BU; MTJ; TCC; RLS re Defendants' change in FSP; supplemental interrogatory answers; expert reports	Discovery (Non-Deposition)
4/19/2024	Guy Wallace	0.4	\$1,350	\$540	com's with RLS re Defendants' production of resident files re named Plaintiffs and completeness thereof	Discovery (Non-Deposition)
4/19/2024	Guy Wallace	0.8	\$1,350	\$1,080	com's with PK; LP; BU re damages and offset for services delivered and not delivered to named Plaintiffs	Experts (Including Retention)
4/19/2024	Guy Wallace	0.6	\$1,350	\$810	com's with Waters; Mastin; MTJ re results of second round of inspections of six facilities	Experts (Including Retention)
4/19/2024	Guy Wallace	1.3	\$1,350	\$1,755	analysis of potential issue re claiming damages for access barriers and persons who are dependent upon assistance; com's with Waters; MTJ; RLS re same	Trial and Pretrial Preparation
4/19/2024	Mark Johnson	1.1	\$1,150	\$1,265	Zoom team mtg re depos, expert reports, MJ Beelers ruling on rogs and depos; mtn to challenge ruling, D revised FSP, mootness argument	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/19/2024	Mark Johnson	0.4	\$1,150	\$460	calls w/ GBW re FSP/Johnson depo, direct threat analysis and proposed questions; legal issue re availability of damages to persons who need assistance, D AD that comply with ADA by providing assistance.	Case Organization, Planning and Strategy
4/19/2024	Mark Johnson	0.3	\$1,150	\$345	coms w/ court reporter re Johnson depo set up and exhibits	Depositions
4/19/2024	Mark Johnson	0.2	\$1,150	\$230	coms w/ OC re michael Johnson deposition location and arrangements	Depositions
4/19/2024	Mark Johnson	7.2	\$1,150	\$8,280	continue working on outline for Johnson/30b6 outline; review and analyze docs re same	Depositions
4/19/2024	Mark Johnson	0.2	\$1,150	\$230	review and analysis of A Spiegel summary of Jennifer Gordan-Alvarez depo	Depositions
4/19/2024	Mark Johnson	0.1	\$1,150	\$115	com w/ OC re depo location and arrangements.	Discovery (Non-Deposition)
4/19/2024	Rachel Steyer	1.8	\$750	\$1,350	completing review of residency agreements and updating spreadsheet with contact info	Discovery (Non-Deposition)
4/19/2024	Rachel Steyer	0.3	\$750	\$225	call with GBW to discuss witnesses and outstanding discovery/resident files	Discovery (Non-Deposition)
4/19/2024	Rachel Steyer	1.1	\$750	\$825	weekly zoom with RBGG, MTJ, GBW, TCC BSU to review and discuss tasks and assignments	Discovery (Non-Deposition)
4/19/2024	Rachel Steyer	0.2	\$750	\$150	communications with RAB on teams re saved searches, finalizing contact list	Discovery (Non-Deposition)
4/19/2024	Rachel Steyer	0.4	\$750	\$300	zoom with GBW, BSU, Dr. Kennedy, LP re revising damages theory	Experts (Including Retention)
4/19/2024	Travis Close	0.5	\$850	\$425	Review and analyze resident evacuation ability forms for the plaintiffs' facilities to identify people who use electric mobility devices	Case Organization, Planning and Strategy
4/19/2024	Travis Close	0.7	\$850	\$595	Review & analyze updated fleet safety policy & related policies produced by Brookdale	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/19/2024	Travis Close	1.1	\$850	\$935	Team meeting with RBGG and SWCK re: Expert reports, updates to plaintiffs' discovery responses, trial preparation	Case Organization, Planning and Strategy
4/19/2024	Travis Close	2.1	\$850	\$1,785	Continue revisions to report of Douglas Cross (Opinions)	Case Organization, Planning and Strategy
4/19/2024	Travis Close	0.5	\$850	\$425	Review and analyze outline for deposition of HWD Gordon-Alvarez	Case Organization, Planning and Strategy
4/19/2024	Travis Close	0.3	\$850	\$255	Email to MTJ re: additional docs from outline to send to Doug Cross	Depositions
4/19/2024	Travis Close	0.3	\$850	\$255	Review and analyze draft report of alex barchuck	Experts (Including Retention)
4/19/2024	Travis Close	2.5	\$850	\$2,125	Continue revisions & additions to douglas cross rule 26 expert report (Brookdale's Fleet Safety Policy Contravenes Applicable Regulations, The Fleet Safety Policy Has Been Consistently Enforced at the California Facilities During the Class Period, Leading to Negative Outcomes for Residents)	Experts (Including Retention)
4/20/2024	Guy Wallace	1.9	\$1,350	\$2,565	preparation of topics and questions for Michael Johnson depo; direct threat	Depositions
4/20/2024	Guy Wallace	3.6	\$1,350	\$4,860	preparation of topics and questions for deposition of Michael Johnson' com's with MTJ re same (.7)	Depositions
4/20/2024	Guy Wallace	0.4	\$1,350	\$540	com's with Mastin re expert reports	Experts (Including Retention)
4/20/2024	Mark Johnson	0.2	\$1,150	\$230	calls w/ GBW re Johnson depo questions	Depositions
4/20/2024	Mark Johnson	0.3	\$1,150	\$345	calls w/ TCC re depo of M Johnson; new policies, exhibits	Depositions
4/20/2024	Mark Johnson	4.7	\$1,150	\$5,405	final prep for Johnson / 30b6 FSP depo; organize exhibits and add questions to outline	Depositions
4/21/2024	Guy Wallace	2.1	\$1,350	\$2,835	review and analysis of draft expert report of Dr. Barchuk; revise and edit same	Experts (Including Retention)
4/21/2024	Mark Johnson	4.0	\$1,150	\$4,600	prep for Johnson depo, including re-reading all emails.	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/21/2024	Mark Johnson	1.5	\$1,150	\$1,725	further prep for Johnson depo, including review of docs and conference w/ TCC	Depositions
4/21/2024	Travis Close	8.3	\$850	\$7,055	Flight from SEA to Fort Lauderdale to attend & assist with deposition of Michael Johnson	Depositions
4/21/2024	Travis Close	1.3	\$850	\$1,105	Travel from home to Seatac airport (bus to link light rail) for tomorrow's deposition	Depositions
4/21/2024	Travis Close	0.6	\$850	\$510	Travel from fort lauderdale airport to hotel for tomorrow's deposition	Depositions
4/21/2024	Travis Close	2.3	\$850	\$1,955	Meet with MTJ to prep for tomorrow's deposition with Michael Johnson	Depositions
4/22/2024	Guy Wallace	1.1	\$1,350	\$1,485	revise and edit drafts of supplemental interrogatory responses of Carlson and Lytle	Depositions
4/22/2024	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ; TCC re Michael Johnson depositions and results thereof	Depositions
4/22/2024	Guy Wallace	2.2	\$1,350	\$2,970	revise and edit draft supplemental responses re Defendants' interrogatories; com's with JY; BBK; BU re same	Discovery (Non-Deposition)
4/22/2024	Guy Wallace	0.8	\$1,350	\$1,080	revise and edit initial draft of Dr. Barchuk's Rule 26 report	Experts (Including Retention)
4/22/2024	Guy Wallace	0.5	\$1,350	\$675	com's with Waters re expert report	Experts (Including Retention)
4/22/2024	Guy Wallace	1.4	\$1,350	\$1,890	review and analysis of draft of expert report of Dr. Jones; com's with JGT; BU re same	Experts (Including Retention)
4/22/2024	Guy Wallace	1.8	\$1,350	\$2,430	revise and edit draft expert report of Dr. Barchuk; com's with GG; AX; re same	Experts (Including Retention)
4/22/2024	Guy Wallace	0.6	\$1,350	\$810	review and analysis of draft report of Dr. Flores	Experts (Including Retention)
4/22/2024	Mark Johnson	7.0	\$1,150	\$8,050	deposition of Michael Johnson / 30(b)(6) on the record	Depositions
4/22/2024	Mark Johnson	2.5	\$1,150	\$2,875	depo prep for Johnson depo including before depo, conferences w/ TCC and review notes during breaks.	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/22/2024	Mark Johnson	0.5	\$1,150	\$575	brief GBW re Johnson depo, implications for course of litigation	Depositions
4/22/2024	Rachel Steyer	6.1	\$750	\$4,575	review of resident files/compiling list of missing docs	Discovery (Non-Deposition)
4/22/2024	Travis Close	0.9	\$850	\$765	Prep for michael johnson depositions at Esquire offices in Fort Lauderdale	Depositions
4/22/2024	Travis Close	3.2	\$850	\$2,720	Deposition of Michael Johnson -- part 1, morning	Depositions
4/22/2024	Travis Close	3.8	\$850	\$3,230	Deposition of Michael Johnson -- part 2, afternoon	Depositions
4/23/2024	Guy Wallace	0.7	\$1,350	\$945	review and analysis of Ninth Circuit decision in Lytle; com's with MTJ; JAU re same	Class Certification
4/23/2024	Guy Wallace	0.5	\$1,350	\$675	review and analysis of further draft of Carlson's second supplemental responses to Defendants' interrogatories	Discovery (Non-Deposition)
4/23/2024	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ; RLS re supplemental interrogatory responses of Stiner	Discovery (Non-Deposition)
4/23/2024	Guy Wallace	0.6	\$1,350	\$810	review and analysis of draft supplemental interrogatory responses of Vallette; com's with AS re same	Discovery (Non-Deposition)
4/23/2024	Guy Wallace	2.1	\$1,350	\$2,835	revise and edit initial drafts of expert reports of Dr. Flores; Schroyer	Experts (Including Retention)
4/23/2024	Guy Wallace	0.3	\$1,350	\$405	com's with BU re draft expert report of Dr. Belson	Experts (Including Retention)
4/23/2024	Guy Wallace	1.2	\$1,350	\$1,620	review and analysis of draft experts reports of Dale Schroyer and Dr. Belson	Experts (Including Retention)
4/23/2024	Guy Wallace	0.5	\$1,350	\$675	review and analysis of Waters draft expert report; com's with Waters; JAU re same	Experts (Including Retention)
4/23/2024	Guy Wallace	0.4	\$1,350	\$540	review and analysis of further draft of expert report of Dr. Barchuk; com's with AX re same	Experts (Including Retention)
4/23/2024	Guy Wallace	1.3	\$1,350	\$1,755	review and analysis of draft expert report of Dr. Flores; preparation of comments re same; com's with JGT; BU re same	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/23/2024	Guy Wallace	0.6	\$1,350	\$810	review and analysis of drafts of Waters and Mastin reports; com's with MTJ; JAU re additions and revisions to same	Experts (Including Retention)
4/23/2024	Jennifer Bybee	2.3	\$925	\$2,128	Compare 2019 and 2024 Scotts Valley reports	Experts (Including Retention)
4/23/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re Waters and Mastin expert reports	Experts (Including Retention)
4/23/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re expert reports	Experts (Including Retention)
4/23/2024	Jennifer Bybee	0.1	\$925	\$93	Email GBW number of barriers in expert reports for San Ramon and Scotts Valley	Experts (Including Retention)
4/23/2024	Mark Johnson	0.2	\$1,150	\$230	coms w/ GBW re trial prep, expert reports, settlement outlook	Case Organization, Planning and Strategy
4/23/2024	Mark Johnson	1.0	\$1,150	\$1,150	prep for Feaster depo - review and revise draft outline	Depositions
4/23/2024	Mark Johnson	2.3	\$1,150	\$2,645	prep for Feaster depo, including review of potential exhibits, revisions to outline,, coms w/ RLS and LEC re exhibits	Depositions
4/23/2024	Mark Johnson	0.3	\$1,150	\$345	coms w/ RLS, Stacy Stiner re location of access barriers for supplemental responses to discovery.	Discovery (Non-Deposition)
4/23/2024	Mark Johnson	0.2	\$1,150	\$230	coms w/ OC Bertino and Rutner re redacted documents and unproduced documents	Discovery (Non-Deposition)
4/23/2024	Rachel Steyer	0.2	\$750	\$150	conversation with MTJ to discuss gathering outstanding docs for Feaster depo; outstanding discovery items	Depositions
4/23/2024	Rachel Steyer	1.3	\$750	\$975	call(s) with Stacia Stiner to review access barriers list	Discovery (Non-Deposition)
4/23/2024	Rachel Steyer	0.2	\$750	\$150	call with Stacia Stiner and MTJ to review and clarify outstanding bathroom barriers and locations	Discovery (Non-Deposition)
4/23/2024	Rachel Steyer	0.8	\$750	\$600	further call with Stacia Stiner to review access barriers	Discovery (Non-Deposition)
4/23/2024	Rachel Steyer	0.2	\$750	\$150	reviewing spreadsheet of transportation complaints produced by defendants	Discovery (Non-Deposition)
4/23/2024	Rachel Steyer	0.6	\$750	\$450	drafting Stiner supplemental ROG responses	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/23/2024	Travis Close	0.7	\$850	\$595	Emails to JIK re: evacuation drills, state-based criteria for review, and scheduling time to visit the facilities	Case Organization, Planning and Strategy
4/23/2024	Travis Close	0.5	\$850	\$425	Review and analyze recent facility evaluation and complaint investigation reports issued at Brookhurst, Scotts Valley, San Ramon, and Tracy facilities	Case Organization, Planning and Strategy
4/23/2024	Travis Close	0.2	\$850	\$170	Email to ESI requests re: request to create FTP link	Case Organization, Planning and Strategy
4/23/2024	Travis Close	0.7	\$850	\$595	Call with GBW re: debrief after deposition of Michael Johnson	Depositions
4/23/2024	Travis Close	0.5	\$850	\$425	Taxi to airport after deposition of Michael Johnson	Depositions
4/23/2024	Travis Close	1.9	\$850	\$1,615	Review, analyze, and organize fire drills & logs for plaintiffs' facilities to share with expert	Discovery (Non-Deposition)
4/23/2024	Travis Close	1.7	\$850	\$1,445	Review and analyze photos of plaintiffs' facilities included in survey reports related to emergency evacuation issues & organize for review by Kailes	Discovery (Non-Deposition)
4/23/2024	Travis Close	0.4	\$850	\$340	Review and analyze questions/notes by June Kailes re: state-based criteria	Experts (Including Retention)
4/23/2024	Travis Close	0.3	\$850	\$255	Review and analyze revised draft report of Alex Barchuk	Experts (Including Retention)
4/23/2024	Travis Close	1.4	\$850	\$1,190	Review and analyze property condition reports for plaintiffs' facilities; organize and send to June Kailes for review	Experts (Including Retention)
4/24/2024	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ re topics and questions for Feaster deposition	Depositions
4/24/2024	Guy Wallace	1.3	\$1,350	\$1,755	review and analysis of initial draft of expert report of Kailes; revise and edit same	Experts (Including Retention)
4/24/2024	Guy Wallace	2.8	\$1,350	\$3,780	revise and edit draft report of Kailes; com's with TCC re same (.6)	Experts (Including Retention)
4/24/2024	Guy Wallace	0.8	\$1,350	\$1,080	com's with Waters; JAU re draft expert report	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/24/2024	Guy Wallace	1.6	\$1,350	\$2,160	review and analysis of draft expert report of Cross; revise and edit same; com's with MTJ; TCC re same	Experts (Including Retention)
4/24/2024	Guy Wallace	2.1	\$1,350	\$2,835	review and analysis of revised draft of expert report of Dr. Flores; com's with BU; MTJ re same (.6)	Experts (Including Retention)
4/24/2024	Guy Wallace	1.3	\$1,350	\$1,755	legal research and analysis re relevance of conditions and events at facilities other than those used by the named Plaintiffs; corporate course of conduct; pattern of Unruh Act violations by a group of defendants; issue of ratification of facility-level conduct by Brookdale Senior Living with respect to liability and punitive damages	Experts (Including Retention)
4/24/2024	Guy Wallace	0.4	\$1,350	\$540	review and analysis of revised draft of expert report of Dr. Jones; com's with JGT; BU re same	Experts (Including Retention)
4/24/2024	Jennifer Bybee	4.0	\$925	\$3,700	Edit and revise Mastin Rule 26 Report	Experts (Including Retention)
4/24/2024	Mark Johnson	0.9	\$1,150	\$1,035	calls (x7) w/ GBW re Feaster depo issues, D's delinquent document production; pre-trial issues and scenarios bearing on settlement, appellate analysis	Case Organization, Planning and Strategy
4/24/2024	Mark Johnson	10.5	\$1,150	\$12,075	Prep for Feaster depo; review docs and parts of Alvarez transcript; revise and add to outline; coms w/ LEC and RLS re same.	Depositions
4/24/2024	Mark Johnson	0.2	\$1,150	\$230	review RLS list of Plaintiff docs not produced	Discovery (Non-Deposition)
4/24/2024	Rachel Steyer	0.2	\$750	\$150	reviewing final responsible party letters	Class Outreach and Contact
4/24/2024	Rachel Steyer	1.1	\$750	\$825	call with Stacia Stiner to review additional San Ramon barriers	Discovery (Non-Deposition)
4/24/2024	Rachel Steyer	0.4	\$750	\$300	further call with Stacia Stiner to review San Ramon access barriers	Discovery (Non-Deposition)
4/24/2024	Rachel Steyer	0.3	\$750	\$225	reviewing and updating San Ramon access barriers spreadsheet	Discovery (Non-Deposition)
4/24/2024	Rachel Steyer	0.6	\$750	\$450	further call with Stacy Stiner to review list of San Ramon access barriers	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/24/2024	Rachel Steyer	1.2	\$750	\$900	completing review of missing dates and categories of name plaintiff resident files	Discovery (Non-Deposition)
4/24/2024	Rachel Steyer	1.1	\$750	\$825	updating and working on Stiner supplemental ROGs	Discovery (Non-Deposition)
4/24/2024	Travis Close	0.5	\$850	\$425	Call with GBW re: revisions & reorganization of Kailes draft expert report	Case Organization, Planning and Strategy
4/24/2024	Travis Close	0.3	\$850	\$255	Email to june kailes re: additional documents evidencing facility conditions for review	Case Organization, Planning and Strategy
4/24/2024	Travis Close	0.3	\$850	\$255	Email to LEC re: follow-up after Monday's deposition with Michael Johnson	Case Organization, Planning and Strategy
4/24/2024	Travis Close	0.4	\$850	\$340	Email to MTJ re: resources for review from Q'Straint website	Case Organization, Planning and Strategy
4/24/2024	Travis Close	1.6	\$850	\$1,360	Review and analyze June Kailes' recent publications during previous ten years for Rule 26 report	Case Organization, Planning and Strategy
4/24/2024	Travis Close	2.3	\$850	\$1,955	Continue revisions & reorganization to draft Kailes report based on proposed edits by GBW (Opinions)	Case Organization, Planning and Strategy
4/24/2024	Travis Close	0.2	\$850	\$170	Email to GBW re: previous Kailes delcarations	Experts (Including Retention)
4/24/2024	Travis Close	0.4	\$850	\$340	Call with GBW re: further revisions and edits made to Kailes report	Experts (Including Retention)
4/24/2024	Travis Close	2.3	\$850	\$1,955	Continue revisions to draft Kailes report (background)	Experts (Including Retention)
4/25/2024	Guy Wallace	0.4	\$1,350	\$540	review and analysis of Hemet facility and potential issues re numerosity	Class Certification
4/25/2024	Guy Wallace	0.5	\$1,350	\$675	review and analysis of supplemental interrogatory responses of Jestrabek-Hart; com's with AX; BBK re same	Discovery (Non-Deposition)
4/25/2024	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of discovery Order from MJ Beeler; com's with ER; BBK; BU; MTJ re same	Discovery (Non-Deposition)
4/25/2024	Guy Wallace	0.4	\$1,350	\$540	com's with RLS re Defendants' failure to produce materials re named Plaintiffs and meet and confer communication re same	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/25/2024	Guy Wallace	1.5	\$1,350	\$2,025	review and analysis of revised versions of expert reports of Dr. Flores and Dr. Jones	Experts (Including Retention)
4/25/2024	Guy Wallace	1.7	\$1,350	\$2,295	review and analysis of further draft of expert report of Dr. Flores; revise and edit same; com's with JGT; BU re same	Experts (Including Retention)
4/25/2024	Guy Wallace	0.7	\$1,350	\$945	com's with Waters; Mastin; JAU re draft expert reports	Experts (Including Retention)
4/25/2024	Guy Wallace	0.7	\$1,350	\$945	com's with LP re draft expert report of Dr. Kennedy	Experts (Including Retention)
4/25/2024	Jennifer Bybee	3.7	\$925	\$3,423	Draft Mastin Rule 26 report	Experts (Including Retention)
4/25/2024	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW re summary of Feaster depo, court ruling on remaining discovery issues, strategy for conferring w/ OC re same and impact on trial schedule.	Case Organization, Planning and Strategy
4/25/2024	Mark Johnson	4.0	\$1,150	\$4,600	depo of Niare Feaster, including Def re-direct and follow-up and negotiation re same	Depositions
4/25/2024	Mark Johnson	2.5	\$1,150	\$2,875	final depo prep and exhibit organization prior to Feater depo; coms w/ LEC re exhibits, set up	Depositions
4/25/2024	Mark Johnson	0.3	\$1,150	\$345	review Magistrate Judge Order on remaining discovery issues and emails among COC and with OC re same	Other Motions
4/25/2024	Rachel Steyer	0.3	\$750	\$225	drafting email to OC re outstanding resident files	Communications With Opposing Counsel
4/25/2024	Rachel Steyer	0.4	\$750	\$300	reviewing Bowman depo testimony re SA dates	Depositions
4/25/2024	Rachel Steyer	0.4	\$750	\$300	reviewing AS depo outline	Depositions
4/25/2024	Rachel Steyer	0.2	\$750	\$150	call with GBW to review and discuss outstanding missing resident files	Discovery (Non-Deposition)
4/25/2024	Rachel Steyer	0.5	\$750	\$375	reviewing Service Alignment docs re date of implementation	Discovery (Non-Deposition)
4/25/2024	Rachel Steyer	0.7	\$750	\$525	preparing chart to provide to OC tracking missing resident files	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/25/2024	Rachel Steyer	3.4	\$750	\$2,550	drafting supplemental ROGs	Discovery (Non-Deposition)
4/25/2024	Travis Close	0.5	\$850	\$425	Review and analyze depo transcript of Michele Lytle for info re: emergency planning & evacuation issues of Ed Boris	Case Organization, Planning and Strategy
4/25/2024	Travis Close	0.5	\$850	\$425	Review and analyze depo testimony by Bernie jestrabek-hart for accounts of evacuations & emergency events at Scotts Valley	Case Organization, Planning and Strategy
4/25/2024	Travis Close	0.6	\$850	\$510	Review and analyze deposition transcript of Ralph Carlson for info re: emergency evacuation & planning issues	Depositions
4/25/2024	Travis Close	0.2	\$850	\$170	Review and analyze court's order addressing recent discovery disputes	Discovery (Non-Deposition)
4/25/2024	Travis Close	2.2	\$850	\$1,870	Updates to facility plan analysis spreadsheet for June Kailes Rule 26 report	Experts (Including Retention)
4/25/2024	Travis Close	1.7	\$850	\$1,445	Further revisions to Kailes Rule 26 report (Knowledge & Experience)	Experts (Including Retention)
4/25/2024	Travis Close	0.9	\$850	\$765	Further revisions to Kailes Rule 26 report (Opinions --- not enough staffing)	Experts (Including Retention)
4/25/2024	Travis Close	2.4	\$850	\$2,040	Further revisions to Kailes Rule 26 Report (addressing comments and proposals by GBW)	Experts (Including Retention)
4/25/2024	Travis Close	1.3	\$850	\$1,105	Further revisions to Kailes rule 26 report (Opinion - residents not involved in emergency planning)	Experts (Including Retention)
4/26/2024	Guy Wallace	0.8	\$1,350	\$1,080	zoom with BBK; AX; AS; KS; BU; MTJ; TCC; RLS re MJ Beeler discovery Order; response re same; remaining tasks re expert reports	Discovery (Non-Deposition)
4/26/2024	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of further draft of expert report of Dr. Barchuk; revise and edit same	Experts (Including Retention)
4/26/2024	Guy Wallace	2.6	\$1,350	\$3,510	review and analysis of further draft of expert report of Kailes; revise and edit same	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/26/2024	Guy Wallace	0.8	\$1,350	\$1,080	revise and edit further draft of report of Dr. Barchuk; com's with AX; MTJ re same	Experts (Including Retention)
4/26/2024	Guy Wallace	0.5	\$1,350	\$675	com's with JGT; BBK; MTJ re draft report of Dr. Flores and revisions re same	Experts (Including Retention)
4/26/2024	Guy Wallace	1.6	\$1,350	\$2,160	revise and edit draft report of Kailes; com's with MTJ; TCC re same (.5)	Experts (Including Retention)
4/26/2024	Guy Wallace	0.4	\$1,350	\$540	review and analysis of draft expert report of Mastin	Experts (Including Retention)
4/26/2024	Guy Wallace	1.3	\$1,350	\$1,755	analysis of com's with JRA; MTJ; JAU re use of summary of voluminous evidence re barriers identified in six facility reports; use of demonstratives of grouped common barriers in expert reports	Experts (Including Retention)
4/26/2024	Guy Wallace	0.8	\$1,350	\$1,080	zoom with Waters; Mastin; JAU re preparation of Rule 26 expert reports	Experts (Including Retention)
4/26/2024	Guy Wallace	0.7	\$1,350	\$945	review and analysis of draft Mastin Rule 26 report	Experts (Including Retention)
4/26/2024	Jennifer Bybee	3.1	\$925	\$2,868	Finalize draft of Mastin Rule 26 report	Experts (Including Retention)
4/26/2024	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re Mastin expert report and call with experts later	Experts (Including Retention)
4/26/2024	Jennifer Bybee	0.2	\$925	\$185	Draft email to J. Mastin and G. Waters re GBW questions	Experts (Including Retention)
4/26/2024	Jennifer Bybee	1.2	\$925	\$1,110	Teams call with GBW, J. Mastin and G. Waters re expert reports	Experts (Including Retention)
4/26/2024	Jennifer Bybee	0.1	\$925	\$93	com's with GBW re call with G. Waters and J. Mastin	Experts (Including Retention)
4/26/2024	Mark Johnson	0.9	\$1,150	\$1,035	zoom call with team members Wallace, Bien-Kahn, Close, Steyer, Spiegel, Xu re depos, interpretation of new discovery order, strategy re meeting and conferring with OC re same; expert reports and completion of supplemental responses to discovery.	Case Organization, Planning and Strategy
4/26/2024	Mark Johnson	0.6	\$1,150	\$690	calls w/ GBW re supplemental disclosures, expert reports	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/26/2024	Mark Johnson	1.0	\$1,150	\$1,150	review Stiner texts for facts to include in supplemental responses to interrogatories, draft email to co-counsel re same	Discovery (Non-Deposition)
4/26/2024	Mark Johnson	0.8	\$1,150	\$920	calls w/ GBW re strategy for expert disclosures on access reports, exhibits, trial issues	Experts (Including Retention)
4/26/2024	Mark Johnson	0.9	\$1,150	\$1,035	review, edit and comment on Barchuk expert report	Experts (Including Retention)
4/26/2024	Mark Johnson	0.5	\$1,150	\$575	coms w/ COC re materials for expert consideration for review, fleet safety policies and emergency planning materials	Experts (Including Retention)
4/26/2024	Rachel Steyer	0.9	\$750	\$675	weekly meeting with RBGG, GBW, MTJ, TCC, BSU to review and discuss outstanding tasks and assignments	Case Organization, Planning and Strategy
4/26/2024	Rachel Steyer	1.3	\$750	\$975	call with Stacy Stiner to review and update supplemental ROG responses	Discovery (Non-Deposition)
4/26/2024	Rachel Steyer	0.9	\$750	\$675	further call with Stacy Stiner to review supplemental ROG responses	Discovery (Non-Deposition)
4/26/2024	Rachel Steyer	0.4	\$750	\$300	call with GBW to review and discuss supplemental disclosures	Discovery (Non-Deposition)
4/26/2024	Rachel Steyer	2.3	\$750	\$1,725	drafting/revising Stiner supplemental ROGs	Discovery (Non-Deposition)
4/26/2024	Travis Close	1.4	\$850	\$1,190	Review and analyze cross's edits to draft rule 26 report; respond to comments and questions	Case Organization, Planning and Strategy
4/26/2024	Travis Close	0.7	\$850	\$595	Email to GBW re: analysis of scooter prohibitions in different versions of the fleet safety policy	Case Organization, Planning and Strategy
4/26/2024	Travis Close	0.4	\$850	\$340	Analyze testimony of BJH re: evacuation experiences at Scotts Valley & send to GBW	Case Organization, Planning and Strategy
4/26/2024	Travis Close	0.8	\$850	\$680	Review and analyze additional excerpts by Cross of regulations pertaining to accommodations for mobility device passengers	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/26/2024	Travis Close	0.5	\$850	\$425	Review and analyze Brookdale's residency handbooks (different versions) for emergency preparedness provisions	Case Organization, Planning and Strategy
4/26/2024	Travis Close	0.8	\$850	\$680	Review, analyze, and organize all versions of Bus Finders contract for emergency transportation	Case Organization, Planning and Strategy
4/26/2024	Travis Close	0.3	\$850	\$255	Review and analyze latest version of Dr. Barchuck report	Case Organization, Planning and Strategy
4/26/2024	Travis Close	1.0	\$850	\$850	Team meeting re: progress on expert reports, interpretation of judge beeler's discovery order, next steps re: interrogatories, and trial schedule	Case Organization, Planning and Strategy
4/26/2024	Travis Close	0.5	\$850	\$425	Review and analyze second supplemental reponses and objections from plaintiffs Boris, Carlson, Jestrabek-Hart, Lindstrom, and Quinlan	Case Organization, Planning and Strategy
4/26/2024	Travis Close	1.4	\$850	\$1,190	Call with Doug Cross re: working through proposed revisions to rule 26 report	Experts (Including Retention)
4/27/2024	Guy Wallace	1.6	\$1,350	\$2,160	review and analysis of draft of Mastin Expert Report; further facility report from Waters re Fountaingrove	Experts (Including Retention)
4/27/2024	Guy Wallace	0.6	\$1,350	\$810	review and analysis of Waters common barriers list re Fountaingrove	Experts (Including Retention)
4/27/2024	Guy Wallace	3.4	\$1,350	\$4,590	review and analysis of draft of Mastin expert report; summary of common barriers prepared by Waters; com's with Waters; Mastin; JAU re same (.7)	Experts (Including Retention)
4/27/2024	Jennifer Bybee	0.7	\$925	\$648	Finalize Mastin expert report draft	Experts (Including Retention)
4/27/2024	Jennifer Bybee	1.4	\$925	\$1,295	Draft Waters Rule 26 report	Experts (Including Retention)
4/27/2024	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re Mastin and Waters expert reports	Experts (Including Retention)
4/27/2024	Travis Close	0.2	\$850	\$170	Email to JIK re: latest draft of report	Case Organization, Planning and Strategy
4/28/2024	Guy Wallace	0.7	\$1,350	\$945	review and analysis of draft supplemental responses of Stiner; com's with MTJ; RLS re same	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/28/2024	Guy Wallace	3.2	\$1,350	\$4,320	revise and edit draft expert report of Mastin; draft facility report for Fountaingrove	Experts (Including Retention)
4/28/2024	Guy Wallace	0.6	\$1,350	\$810	com's with Waters re lists of common barriers in facilities	Experts (Including Retention)
4/28/2024	Guy Wallace	2.8	\$1,350	\$3,780	revise and edit draft of Mastin expert report; draft facility reports re Scotts Valley; Tracy; Fountaingrove; Hemet; Brookhurst; San Ramon	Experts (Including Retention)
4/28/2024	Guy Wallace	2.4	\$1,350	\$3,240	review and analysis of draft Waters report; revise and edit same	Experts (Including Retention)
4/28/2024	Jennifer Bybee	1.0	\$925	\$925	Review and redline Brookhurst barrier list	Experts (Including Retention)
4/28/2024	Jennifer Bybee	1.0	\$925	\$925	Review and redline Hemet barrier list	Experts (Including Retention)
4/28/2024	Jennifer Bybee	0.9	\$925	\$833	Review Fountaingrove list off barriers and redline edit	Experts (Including Retention)
4/28/2024	Jennifer Bybee	1.2	\$925	\$1,110	Review Scotts Valley barrier list and create redline edit	Experts (Including Retention)
4/28/2024	Jennifer Bybee	0.6	\$925	\$555	Review San Ramon barrier list and create redline edit	Experts (Including Retention)
4/28/2024	Mark Johnson	5.5	\$1,150	\$6,325	work on review and revision / addition to Stiner supplemental responses to D rogs, and review of docs and notes for same.	Discovery (Non-Deposition)
4/28/2024	Mark Johnson	1.3	\$1,150	\$1,495	review docs produced by Ds re reluctance to care and Stiner	Discovery (Non-Deposition)
4/28/2024	Rachel Steyer	0.6	\$750	\$450	reviewing and incorporating MTJ edits to draft supplemental Stiner ROGs	Discovery (Non-Deposition)
4/28/2024	Rachel Steyer	0.4	\$750	\$300	reviewing and fixing subject matter/grammar for consistency in supplemental Stiner ROGs	Discovery (Non-Deposition)
4/29/2024	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ re preparation for meet and confer with Defendants re their objections to recent discovery Order; proposed CMC with J. Gilliam	Discovery (Non-Deposition)
4/29/2024	Guy Wallace	0.5	\$1,350	\$675	zoom with Bertino; Jacobsen; BBK; MTJ re proposed request for CMC with J. Gilliam; Rule 72 objections to discovery Order	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/29/2024	Guy Wallace	0.7	\$1,350	\$945	review and analysis of draft supplemental discovery responses re Schmidt; revise and edit same; com's with BU re same	Discovery (Non-Deposition)
4/29/2024	Guy Wallace	1.2	\$1,350	\$1,620	review and analysis of further drafts of supplemental responses to Defendants' interrogatories to Stiner; com's with MTJ; RLS re same	Discovery (Non-Deposition)
4/29/2024	Guy Wallace	2.6	\$1,350	\$3,510	revise and edit draft expert reports of Waters; Mastin; com's with Waters; Mastin; JAU re same	Experts (Including Retention)
4/29/2024	Guy Wallace	0.9	\$1,350	\$1,215	com's with DTM; JT; BU; MTJ re draft expert reports of Dr. Flores; Schroyer	Experts (Including Retention)
4/29/2024	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of draft expert report of Kailes; revise and edit same; com's with TCC re same	Experts (Including Retention)
4/29/2024	Guy Wallace	0.2	\$1,350	\$270	com's with TCC re draft expert report of Cross	Experts (Including Retention)
4/29/2024	Jennifer Bybee	0.1	\$925	\$93	Review emails re expert facility reports	Experts (Including Retention)
4/29/2024	Jennifer Bybee	0.6	\$925	\$555	Edit and revise G. Waters Rule 26 report	Experts (Including Retention)
4/29/2024	Jennifer Bybee	1.0	\$925	\$925	Review and revise Mastin Rule 26 report	Experts (Including Retention)
4/29/2024	Jennifer Bybee	0.6	\$925	\$555	Com's with GBW re Mastin and Waters report	Experts (Including Retention)
4/29/2024	Jennifer Bybee	0.2	\$925	\$185	Teams call with GBW, G. Waters and J. Mastin	Experts (Including Retention)
4/29/2024	Jennifer Bybee	2.0	\$925	\$1,850	Finalize Hemet barrier report and incorporate J. Mastin edits	Experts (Including Retention)
4/29/2024	Jennifer Bybee	1.2	\$925	\$1,110	Finalize and incorporate G. Waters edits into Fountaingrove barrier list report	Experts (Including Retention)
4/29/2024	Jennifer Bybee	0.7	\$925	\$648	Finalize and incorporate edits into Tracy barrier report	Experts (Including Retention)
4/29/2024	Jennifer Bybee	0.7	\$925	\$648	Finalize Scotts Valley barrier report	Experts (Including Retention)
4/29/2024	Jennifer Bybee	0.1	\$925	\$93	Email GBW re status of expert disclosure	Experts (Including Retention)
4/29/2024	Mark Johnson	0.7	\$1,150	\$805	texts and calls w/ R Stiner re information for Stiner supplemental responses to rogs	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/29/2024	Mark Johnson	0.7	\$1,150	\$805	meet and confer w/ OC Bertino, Jacobsen, Gravante with Wallace and Bien-Kahn re D request for status conference based on discovery order, D intent re production of docs and rog responses.	Other Motions
4/29/2024	Rachel Steyer	0.2	\$750	\$150	reviewing Stiner supplemental ROGs and identifying the ones that require further follow up with Rita, email to MTJ	Discovery (Non-Deposition)
4/29/2024	Rachel Steyer	1.5	\$750	\$1,125	further drafting and revisions to Stiner supplemental ROGs	Discovery (Non-Deposition)
4/29/2024	Rachel Steyer	2.6	\$750	\$1,950	updating/revising and reorganizing supplemental disclosures	Discovery (Non-Deposition)
4/29/2024	Rachel Steyer	0.6	\$750	\$450	reviewing excerpts of impacts on understaffing circulated by BBK	Discovery (Non-Deposition)
4/29/2024	Rachel Steyer	0.2	\$750	\$150	reviewing memo from BBK re meet and confer	Discovery (Non-Deposition)
4/29/2024	Rachel Steyer	0.3	\$750	\$225	response to RBGG, GBW, MTJ, TCC, BSU providing overview of supplemental disclosures	Discovery (Non-Deposition)
4/29/2024	Rachel Steyer	0.9	\$750	\$675	follow up call with Stacy to review further questions re supplemental ROGs	Discovery (Non-Deposition)
4/29/2024	Travis Close	0.4	\$850	\$340	Email to GBW re: update on progress of Kailes and Cross reports	Case Organization, Planning and Strategy
4/29/2024	Travis Close	2.1	\$850	\$1,785	Continue revisions to June Kailes rule 26 report (addressing revisions by GBW)	Case Organization, Planning and Strategy
4/29/2024	Travis Close	1.3	\$850	\$1,105	Analysis of facility-level plans that copied information directly from emergency manual	Experts (Including Retention)
4/29/2024	Travis Close	1.8	\$850	\$1,530	Analysis of evidence of which plaintiffs lived on upper floors at brookdale facilities	Experts (Including Retention)
4/29/2024	Travis Close	2.3	\$850	\$1,955	Continue revisions to June Kailes rule 26 report (addressing revisions by JIK)	Experts (Including Retention)
4/30/2024	Guy Wallace	1.3	\$1,350	\$1,755	revise and edit supplemental responses of Stiner to Defendants' interrogatories; analysis of damages	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/30/2024	Guy Wallace	0.5	\$1,350	\$675	review and analysis of final draft of supplemental responses of Stiner to Defendants' interrogatories; com's with MTJ; RLS re same	Discovery (Non-Deposition)
4/30/2024	Guy Wallace	0.7	\$1,350	\$945	review and analysis of further draft of supplemental Initial Disclosures; revise and edit same; com's with RLS re same	Discovery (Non-Deposition)
4/30/2024	Guy Wallace	1.8	\$1,350	\$2,430	review and analysis of draft expert reports from Waters; Mastin; summaries of barriers; com's with Waters; Mastin; JAU re same	Experts (Including Retention)
4/30/2024	Guy Wallace	1.3	\$1,350	\$1,755	com's with JGT; BU; MTJ; RAB re revisions to further draft of expert report of Dr. Flores; appendices and exhibits re same	Experts (Including Retention)
4/30/2024	Guy Wallace	2.2	\$1,350	\$2,970	review and analysis of draft expert report of Dr. Kennedy; com's with LP; MTJ re same; revise and edit same	Experts (Including Retention)
4/30/2024	Guy Wallace	0.9	\$1,350	\$1,215	legal research and analysis re availability of pre-judgment interest; post-judgment interest re damages and statutory damages under CA and federal law	Experts (Including Retention)
4/30/2024	Guy Wallace	0.4	\$1,350	\$540	review and analysis of further draft of expert report of Kailes; com's with TCC re same	Experts (Including Retention)
4/30/2024	Guy Wallace	0.4	\$1,350	\$540	review and analysis of Defendants' objections to MJ Beeler's Order; com's with MTJ re same	Other Motions
4/30/2024	Jennifer Bybee	0.2	\$925	\$185	Finalize Scotts Valley barrier report	Experts (Including Retention)
4/30/2024	Jennifer Bybee	0.4	\$925	\$370	Update Mastin Rule 26 report with Scotts Valley common barrier info	Experts (Including Retention)
4/30/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re Scotts Valley Report	Experts (Including Retention)
4/30/2024	Jennifer Bybee	1.1	\$925	\$1,018	Edit and revise Waters Rule 26 report	Experts (Including Retention)
4/30/2024	Jennifer Bybee	1.1	\$925	\$1,018	Finalize San Ramon barrier report	Experts (Including Retention)
4/30/2024	Jennifer Bybee	0.2	\$925	\$185	Finalize Scotts Valley Barrier reports	Experts (Including Retention)
4/30/2024	Jennifer Bybee	0.5	\$925	\$463	Finalize Brookhurst report	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/30/2024	Jennifer Bybee	0.6	\$925	\$555	Finalize Hemet report	Experts (Including Retention)
4/30/2024	Mark Johnson	0.5	\$1,150	\$575	call w/ GBW re expert reports, merits of case, trial strategy	Case Organization, Planning and Strategy
4/30/2024	Mark Johnson	1.0	\$1,150	\$1,150	calls w/ GBW re expert reports, Stiner supplemental responses, damages issues	Case Organization, Planning and Strategy
4/30/2024	Mark Johnson	0.4	\$1,150	\$460	additional review of and edits to Stiner supplemental rog responses, coms w/ RLS re same	Discovery (Non-Deposition)
4/30/2024	Mark Johnson	0.7	\$1,150	\$805	further edits to Stiner supplemental rog responses; coms w/ GBW and RLS re same	Discovery (Non-Deposition)
4/30/2024	Mark Johnson	0.3	\$1,150	\$345	coms w/ RLS re logistics of stiner supp responses to rogs, service of same; review final of same.	Discovery (Non-Deposition)
4/30/2024	Mark Johnson	2.3	\$1,150	\$2,645	review and propose edits, revisions to Kailes Rule 26 report	Experts (Including Retention)
4/30/2024	Mark Johnson	0.3	\$1,150	\$345	coms w/ TCC re Kailes expert report; call w/ GBW re same (.1)	Experts (Including Retention)
4/30/2024	Mark Johnson	0.5	\$1,150	\$575	research NFPA site and review evacuation guide, members of disability access review and advisory committee.	Experts (Including Retention)
4/30/2024	Mark Johnson	0.2	\$1,150	\$230	review prior expert declaration for language re reasonable modification of policies; com w/ GBW re same	Experts (Including Retention)
4/30/2024	Mark Johnson	0.8	\$1,150	\$920	analyze source docs and revise spreadsheets showing Stiner account history and breakout of payments by care category; coms w/ RLS and Lindsay Petite re same and re elements of Kennedy damages analysis.	Experts (Including Retention)
4/30/2024	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW re D objections to 4/25 discovery order, issues raised by same and strategy for responding.	Other Motions
4/30/2024	Mark Johnson	0.4	\$1,150	\$460	review and analyze D objections to 4/25 discovery order	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/30/2024	Mark Johnson	0.4	\$1,150	\$460	review and draft response to OC email re objections to discovery order an proposed expedited briefing schedule on proposed motion to stay; com w/ GBW re same	Other Motions
4/30/2024	Rachel Steyer	0.3	\$750	\$225	received call from RP of outgoing Brookdale resident, scheduled follow up intake call	Class Outreach and Contact
4/30/2024	Rachel Steyer	0.2	\$750	\$150	reviewing and incorporating GBW edits to supplemental Stiner ROGs	Discovery (Non-Deposition)
4/30/2024	Rachel Steyer	0.3	\$750	\$225	reviewing and fixing numbering in Stiner supplemental ROGs, incorporating additional edits	Discovery (Non-Deposition)
4/30/2024	Rachel Steyer	2.7	\$750	\$2,025	revising and updating supplemental disclosures	Discovery (Non-Deposition)
4/30/2024	Rachel Steyer	0.2	\$750	\$150	reviewing exhibit z price schedules	Discovery (Non-Deposition)
4/30/2024	Rachel Steyer	1.0	\$750	\$750	reviewing production for Stiner rate increase letters	Discovery (Non-Deposition)
4/30/2024	Rachel Steyer	0.2	\$750	\$150	preparing/combining RFAs for supplemental disclosures	Discovery (Non-Deposition)
4/30/2024	Rachel Steyer	0.2	\$750	\$150	reviewing defendants' motion for relief for discovery order	Other Motions
4/30/2024	Travis Close	0.6	\$850	\$510	Review and analyze edits by GBW to draft rule 26 report for Kailes; make required modifications	Case Organization, Planning and Strategy
4/30/2024	Travis Close	2.4	\$850	\$2,040	Additions & revisions to rule 26 report following call with expert Kailes	Case Organization, Planning and Strategy
4/30/2024	Travis Close	0.6	\$850	\$510	Call with June Kailes re: discussing final revisions and additions to Rule 26 report	Case Organization, Planning and Strategy
4/30/2024	Travis Close	0.3	\$850	\$255	Email to MTJ re: video showing harrowing bus escape from fountaingrove	Case Organization, Planning and Strategy
4/30/2024	Travis Close	0.2	\$850	\$170	Email to GBW re: whether redactions are necessary to tomorrow's reports	Case Organization, Planning and Strategy
4/30/2024	Travis Close	1.6	\$850	\$1,360	Edits to Kailes Rule 26 report addressing revisions & additions by MTJ	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
4/30/2024	Travis Close	1.7	\$850	\$1,445	Final review, revisions to Kailes Rule 26 report	Case Organization, Planning and Strategy
4/30/2024	Travis Close	2.7	\$850	\$2,295	Call with June Kailes re: working through near-final draft of rule 26 report	Experts (Including Retention)
4/30/2024	Travis Close	0.7	\$850	\$595	Research emergency evacuation checklists and other information available from the national fire protection association	Experts (Including Retention)
4/30/2024	Travis Close	0.8	\$850	\$680	Create exhibits A & B to Kailes rule 26 report	Experts (Including Retention)
5/1/2024	Guy Wallace	0.8	\$1,350	\$1,080	revise and edit draft expert report of Dr. Kennedy; com's with PK; LP; BU; MTJ re same	Experts (Including Retention)
5/1/2024	Guy Wallace	1.5	\$1,350	\$2,025	revise and edit final draft of expert report of Kailes; com's with TCC re same	Experts (Including Retention)
5/1/2024	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of further drafts of expert report of Dr. Kennedy; com's with PK; LP; MTJ re same	Experts (Including Retention)
5/1/2024	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of further drafts of expert reports of Dr. Flores and Dale Schroyer; com's with JGT; BU re same	Experts (Including Retention)
5/1/2024	Guy Wallace	0.5	\$1,350	\$675	review and analysis of further draft of expert report of Kailes; com's with MTJ; TCC re same	Experts (Including Retention)
5/1/2024	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ re Defendants' expert disclosures	Experts (Including Retention)
5/1/2024	Guy Wallace	3.4	\$1,350	\$4,590	review and analysis of further drafts of Mastin Rule 26 report; revise and edit same; com's with Mastin; JAU re same (1.1)	Experts (Including Retention)
5/1/2024	Guy Wallace	3.1	\$1,350	\$4,185	review and analysis of further drafts of Waters Rule 26 report; revise and edit same; com's with Waters; JAU re same (1.1)	Experts (Including Retention)
5/1/2024	Jennifer Bybee	0.4	\$925	\$370	Edit and revise Waters Rule 26 report	Experts (Including Retention)
5/1/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with G. Waters and J. Mastin re versions of reports	Experts (Including Retention)
5/1/2024	Jennifer Bybee	0.6	\$925	\$555	Revise and finalize Fountaingrove barrier report	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/1/2024	Jennifer Bybee	0.1	\$925	\$93	Send Teams invite to GBW, G. Waters and J. Mastin	Experts (Including Retention)
5/1/2024	Jennifer Bybee	0.9	\$925	\$833	Revise Mastin Rule 26 report	Experts (Including Retention)
5/1/2024	Jennifer Bybee	0.3	\$925	\$278	Teams call with GBW, J. Mastin and G. Waters	Experts (Including Retention)
5/1/2024	Jennifer Bybee	1.9	\$925	\$1,758	Edit numbering in Waters common barrier lists and Rule 26 report	Experts (Including Retention)
5/1/2024	Jennifer Bybee	0.9	\$925	\$833	Review Mastin common barrier lists and Rule 26 report	Experts (Including Retention)
5/1/2024	Jennifer Bybee	0.9	\$925	\$833	Finalize Mastin exhibits	Experts (Including Retention)
5/1/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with TCC re creating Fountaingrove common barrier exhibit	Experts (Including Retention)
5/1/2024	Jennifer Bybee	0.9	\$925	\$833	Edit and renumber Tracy common area reports and Waters Rule 26 report	Experts (Including Retention)
5/1/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re Mastin Rule 26 report and exhibits	Experts (Including Retention)
5/1/2024	Jennifer Bybee	0.3	\$925	\$278	Teams call with GBW, G. Waters and J. Mastin re status	Experts (Including Retention)
5/1/2024	Jennifer Bybee	0.1	\$925	\$93	Review fountaingrove common barriers exhibit	Experts (Including Retention)
5/1/2024	Jennifer Bybee	0.3	\$925	\$278	Edit and revise Mastin Rule 26 report; include Hemet common barriers	Experts (Including Retention)
5/1/2024	Jennifer Bybee	0.3	\$925	\$278	Com's with GBW re Waters report	Experts (Including Retention)
5/1/2024	Jennifer Bybee	1.5	\$925	\$1,388	Finalize Waters draft and exhibits	Experts (Including Retention)
5/1/2024	Jennifer Bybee	0.9	\$925	\$833	Finalize Mastin Rule 26 report	Experts (Including Retention)
5/1/2024	Jennifer Bybee	0.9	\$925	\$833	Finalize Mastin Rule 26 report and exhibits	Experts (Including Retention)
5/1/2024	Jennifer Bybee	1.2	\$925	\$1,110	Finalize all documents for serving	Experts (Including Retention)
5/1/2024	Mark Johnson	0.2	\$1,150	\$230	email to L Petite, P. Kennedy and others re expert report and Stiner damages; review response	Experts (Including Retention)
5/1/2024	Mark Johnson	0.1	\$1,150	\$115	email to GBW re damages expert report and Stiner damages	Experts (Including Retention)
5/1/2024	Mark Johnson	0.3	\$1,150	\$345	review Kennedy expert report re damages	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/1/2024	Mark Johnson	0.3	\$1,150	\$345	review revised version of Kailes report and GBW edits to same.	Experts (Including Retention)
5/1/2024	Mark Johnson	1.2	\$1,150	\$1,380	review Flores expert report	Experts (Including Retention)
5/1/2024	Rachel Steyer	0.4	\$750	\$300	reviewing Stiner docs for credit info	Discovery (Non-Deposition)
5/1/2024	Rachel Steyer	2.3	\$750	\$1,725	reviewing defendants' latest production, updating chart tracking missing items	Discovery (Non-Deposition)
5/1/2024	Travis Close	1.9	\$850	\$1,615	Kailes Rule 26 report -- finish final formatting; add TOC; one last read-through; add Exhibits	Case Organization, Planning and Strategy
5/1/2024	Travis Close	0.2	\$850	\$170	Email to team & co-counsel re: signed version of Kailes Rule 26 report	Case Organization, Planning and Strategy
5/1/2024	Travis Close	0.2	\$850	\$170	Email to Doug Cross re: scheduling time to talk tomorrow	Case Organization, Planning and Strategy
5/1/2024	Travis Close	0.6	\$850	\$510	Email to MTJ re: analysis of testimony re: safe securement in Doug Cross's rule 26 report	Experts (Including Retention)
5/1/2024	Travis Close	0.7	\$850	\$595	Review and analyze draft Mastin rule 26 report	Experts (Including Retention)
5/1/2024	Travis Close	0.6	\$850	\$510	Review and analyze draft Waters rule 26 report	Experts (Including Retention)
5/1/2024	Travis Close	1.2	\$850	\$1,020	Review/proofread common barriers for Brookhurst facility; organize and combine into Exhibit for Rule 26 reports	Experts (Including Retention)
5/1/2024	Travis Close	1.3	\$850	\$1,105	Review/proofread common barriers for Fountaingrove facility; organize and combine into Exhibit for Rule 26 reports	Experts (Including Retention)
5/1/2024	Travis Close	1.5	\$850	\$1,275	Review/proofread common barriers for Tracy facility; organize and combine into Exhibit for Rule 26 reports	Experts (Including Retention)
5/1/2024	Travis Close	1.1	\$850	\$935	Review/proofread common barriers for San Ramon facility; organize and combine into Exhibit for Rule 26 reports	Experts (Including Retention)
5/2/2024	Guy Wallace	1.8	\$1,350	\$2,430	review and analysis of Mastin errata re common barrier lists; com's with Mastin; MTJ; JAU; TCC re same	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/2/2024	Guy Wallace	0.5	\$1,350	\$675	com's with Waters re Rule 26 report; common barriers lists; pretrial schedule	Experts (Including Retention)
5/2/2024	Guy Wallace	1.5	\$1,350	\$2,025	review and analysis of final expert reports of Dr. Flores; Dale Schroyer; Kailes; Dr. Kennedy	Experts (Including Retention)
5/2/2024	Guy Wallace	0.5	\$1,350	\$675	review and analysis of Order from HSG denying Defendants' Rule 72 motion; com's with JY; MTJ re same	Other Motions
5/2/2024	Jennifer Bybee	0.3	\$925	\$278	Com's with GBW re notice of errata re common barrier lists	Experts (Including Retention)
5/2/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with TCC re checking facility common barrier lists for quality	Experts (Including Retention)
5/2/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re notices of errata	Experts (Including Retention)
5/2/2024	Mark Johnson	0.5	\$1,150	\$575	call w GBW re Cross expert report, impact of denial of D objectoions to discovery order; settlement scenarios	Case Organization, Planning and Strategy
5/2/2024	Mark Johnson	0.1	\$1,150	\$115	draft email to OC re meeting and conferring re compliance w/ discovery order	Discovery (Non-Deposition)
5/2/2024	Mark Johnson	1.5	\$1,150	\$1,725	call w/ D Cross, T Close re expert report on FSP	Experts (Including Retention)
5/2/2024	Mark Johnson	0.3	\$1,150	\$345	review and analyze research memo from S Spiegall re consequences of not serving opening expert reports.	Experts (Including Retention)
5/2/2024	Mark Johnson	0.3	\$1,150	\$345	calls (x3) w/ GBW re erratas to expert reports on access issues	Experts (Including Retention)
5/2/2024	Mark Johnson	0.1	\$1,150	\$115	call w T Close re Cross expert report and call re same	Experts (Including Retention)
5/2/2024	Mark Johnson	0.8	\$1,150	\$920	partial review of draft expert report from D Cross for conference call	Experts (Including Retention)
5/2/2024	Mark Johnson	0.2	\$1,150	\$230	review Order denying objections to discovery order; coms w/ COC re same	Other Motions
5/2/2024	Rachel Steyer	0.2	\$750	\$150	reviewing research memo re rebuttal expert reports	Misc. Research
5/2/2024	Travis Close	0.3	\$850	\$255	Email to GBW re: revised upcoming litigation deadlines	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/2/2024	Travis Close	0.2	\$850	\$170	Email to MTJ re: notes for today's call with doug cross	Case Organization, Planning and Strategy
5/2/2024	Travis Close	0.2	\$850	\$170	Email to GBW re: date for rebuttal expert reports	Case Organization, Planning and Strategy
5/2/2024	Travis Close	0.2	\$850	\$170	Call with JUB re: errata review assignment	Case Organization, Planning and Strategy
5/2/2024	Travis Close	1.8	\$850	\$1,530	Errata review -- Access reports - Tracy, San Ramon, Scotts Valley facilities (common barriers)	Experts (Including Retention)
5/2/2024	Travis Close	0.3	\$850	\$255	Email to MTJ re: changes in latest draft of Cross report	Experts (Including Retention)
5/2/2024	Travis Close	0.4	\$850	\$340	Email to June kailes re: planning facility visits next month	Experts (Including Retention)
5/2/2024	Travis Close	0.8	\$850	\$680	Errata review -- access reports -- Fountaingrove and Tracy facilities	Experts (Including Retention)
5/2/2024	Travis Close	1.4	\$850	\$1,190	Review and analyze materials provided by doug cross re: direct threat & legitimate safety requirements	Experts (Including Retention)
5/2/2024	Travis Close	2.5	\$850	\$2,125	Call with MTJ, Doug Cross re: progress on rule 26 report and next steps	Experts (Including Retention)
5/3/2024	Guy Wallace	1.2	\$1,350	\$1,620	com's with GG; JY; BBK; AS; BU; MTJ; TCC; RLS re district court order re discovery; meet and confer re same; impact on pretrial and trial schedule; trial preparation	Discovery (Non-Deposition)
5/3/2024	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re preparation for meet and confer with Defendants re compliance with district court orders re discovery	Discovery (Non-Deposition)
5/3/2024	Guy Wallace	1.5	\$1,350	\$2,025	review and analysis of revised exhibits to Mastin report; preparation of letter to Defendants' re same; com's with Mastin re same	Experts (Including Retention)
5/3/2024	Guy Wallace	0.3	\$1,350	\$405	review of email from Bertino re alleged omissions from staffing disclosure; com's with BU; MTJ re same	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/3/2024	Mark Johnson	1.3	\$1,150	\$1,495	team mtg w/ Wallace, Grunfeld, Bien-Kahn, Spiegel, Umpiere, Edmundson, Close, Stilber, Styer, Yelin re discovery order, planning for meet and confer, dispositive motions, pre-trial schedule, expert discovery, etc.	Case Organization, Planning and Strategy
5/3/2024	Mark Johnson	2.4	\$1,150	\$2,760	Prepare outline/memo for meet and confer re discovery orders,; review and analyze 2 orders, multiple underlying letter briefs and discovery requests for same	Discovery (Non-Deposition)
5/3/2024	Rachel Steyer	1.3	\$750	\$975	weekly meeting with RBGG, GBW, MTJ, TCC, BSU to review and discuss outstanding tasks and assignments	Case Organization, Planning and Strategy
5/3/2024	Rachel Steyer	0.2	\$750	\$150	reviewing memo from MTJ outlining discovery disputes pre meet and confer	Discovery (Non-Deposition)
5/3/2024	Rachel Steyer	0.2	\$750	\$150	reviewing TCC chart of fleet safety docs and resident complaints	Discovery (Non-Deposition)
5/3/2024	Travis Close	1.2	\$850	\$1,020	Analyze & reorganize deposition transcripts, exhibits, & depo tracking for rule 26 reports and expert productions	Case Organization, Planning and Strategy
5/3/2024	Travis Close	0.4	\$850	\$340	Email to MTJ re: basis for rejecting defendants' practice of redacting resident information in recent productions	Case Organization, Planning and Strategy
5/3/2024	Travis Close	0.3	\$850	\$255	Review and analyze summary by MTJ re: courts' recent discovery orders and agenda for next week's meet and confer	Case Organization, Planning and Strategy
5/3/2024	Travis Close	1.5	\$850	\$1,275	Team meeting with MTJ, GBW, and co-counsel re: rebuttal expert reports, trial schedule, discovery strategy, motions for summary judgment, etc.	Case Organization, Planning and Strategy
5/3/2024	Travis Close	0.3	\$850	\$255	Email to MTJ re: visiting stacia stiner at San Ramon	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/3/2024	Travis Close	0.3	\$850	\$255	Email to AS (co-counsel) re: coordinating visit to Bernie at Scotts Valley	Case Organization, Planning and Strategy
5/3/2024	Travis Close	0.3	\$850	\$255	Email to June Kailes re: coordinating visits to the san ramon and scotts valley facilities	Case Organization, Planning and Strategy
5/3/2024	Travis Close	0.2	\$850	\$170	Review and analyze defendants' responses & objections to plaintiffs' RFPs, set twelve	Case Organization, Planning and Strategy
5/3/2024	Travis Close	0.2	\$850	\$170	Email to LEC re: reorganization of deposition, transcripts & exhibits folders	Case Organization, Planning and Strategy
5/3/2024	Travis Close	1.7	\$850	\$1,445	Organize compendium of evidence for june kailes rule 26 report (all docs considered, reviewed, and/or relied upon)	Experts (Including Retention)
5/3/2024	Travis Close	1.6	\$850	\$1,360	Organize compendium of evidence for june kailes rule 26 report (all docs considered, reviewed, and/or relied upon) (continued)	Experts (Including Retention)
5/6/2024	Guy Wallace	0.7	\$1,350	\$945	analysis of Defendants' potential arguments in opposition to motion for certification of subclasses; com's with RAB; RLS re preparation of analysis of Residency Agreements re access upon request language	Class Certification
5/6/2024	Guy Wallace	1.2	\$1,350	\$1,620	zoom with ER; JB; MJ; JG; BBK; MTJ; TCC re compliance with MJ Beeler's discovery Orders, timelines and scope thereof	Communications With Opposing Counsel
5/6/2024	Guy Wallace	0.8	\$1,350	\$1,080	prepare for meet and confer with Defendants re MJ Beeler's discovery Orders; com's with MTJ re same	Discovery (Non-Deposition)
5/6/2024	Guy Wallace	0.6	\$1,350	\$810	com's with BBK; MTJ; TCC re results of meet and confer with Defendants	Discovery (Non-Deposition)
5/6/2024	Guy Wallace	0.3	\$1,350	\$405	com's with RLS re revised script re class outreach; review and analysis of draft of same	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/6/2024	Mark Johnson	1.2	\$1,150	\$1,380	meet and confer w/ OC Rutner, Jacobsen, Bertino, Gravante and COC Wallace, Close, Bien-Kahn re docs to be produced per Court orders of 4/18 and 4/25	Discovery (Non-Deposition)
5/6/2024	Mark Johnson	0.5	\$1,150	\$575	follow-up call w Wallace, Close, Bien-Kahn re action items based on meet and confer w/ OC re response to discovery orders of 4/18 and 4/25.	Discovery (Non-Deposition)
5/6/2024	Mark Johnson	0.2	\$1,150	\$230	pre-call w/ G Wallace re statgegy of addressing certain issues on meet and confer w/ OC re compliance with discovery orders of 4/18 and 4/ 25.	Discovery (Non-Deposition)
5/6/2024	Mark Johnson	0.1	\$1,150	\$115	review email from J Thornton re progress on production of addtional data; draft email to OC re same	Experts (Including Retention)
5/6/2024	Rachel Steyer	0.2	\$750	\$150	call with MTJ to discuss review of production in advance of meet and confer	Discovery (Non-Deposition)
5/6/2024	Rachel Steyer	0.9	\$750	\$675	reviewing list of docs for supplementation, analyzing vis a vis discovery order for MTJ	Discovery (Non-Deposition)
5/6/2024	Rachel Steyer	0.2	\$750	\$150	reviewing BBK notes from meet and confer	Discovery (Non-Deposition)
5/6/2024	Rachel Steyer	0.3	\$750	\$225	reviewing defendants' supplemental responses to RFAs	Discovery (Non-Deposition)
5/6/2024	Rachel Steyer	0.4	\$750	\$300	reviewing emails and billing statemetns provided by class member, updating notes in intake	Discovery (Non-Deposition)
5/6/2024	Travis Close	0.5	\$850	\$425	Email to JIK (expert) re: update on compilation of rule 26 evidence; guidance for site visits; and survey reports	Case Organization, Planning and Strategy
5/6/2024	Travis Close	1.2	\$850	\$1,020	Meet and confer with MTJ, BBJ, GBW, and opposing counsel re: courts' recent discovery orders	Case Organization, Planning and Strategy
5/6/2024	Travis Close	0.7	\$850	\$595	Meet with MTJ, GBW, BBK re: debriefing after discovery meeting with defendants	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/6/2024	Travis Close	0.7	\$850	\$595	Clean up notes after m/c with defendants; propose action items & send to team	Communications With Opposing Counsel
5/6/2024	Travis Close	1.2	\$850	\$1,020	Analysis of relevant cites to depo testimony re: emergency evacuation and planning (Jestrabek-Hart, Lytle, Stiner Vol 1, Stiner Vol 2, Carlson, Reddy, Buot, Ward)	Depositions
5/6/2024	Travis Close	1.3	\$850	\$1,105	Analysis of relevant cites to depo testimony re: emergency evacuation and planning (Harris, Withers, Kamdar, Ataeian, Presley, Kailes, Bowman)	Depositions
5/6/2024	Travis Close	0.7	\$850	\$595	Errata review -- Mastin expert reports -- Brookhurst, Hemet	Experts (Including Retention)
5/6/2024	Travis Close	0.9	\$850	\$765	Rule 26 reports errata review -- Mastin -- San Ramon, Scotts Valley	Experts (Including Retention)
5/6/2024	Travis Close	0.9	\$850	\$765	Rule 26 reports errata review -- Waters -- Fountaingrove, Tracy	Experts (Including Retention)
5/7/2024	Guy Wallace	0.8	\$1,350	\$1,080	com's with MTJ re response to ER email re compliance issues and disputes re scope of MJ Beeler's April discovery orders; response thereto; case schedule	Discovery (Non-Deposition)
5/7/2024	Guy Wallace	1.4	\$1,350	\$1,890	review and analysis of letter from Defendants re scope of MJ Beeler's discovery orders and proposed productions re same; com's with MTJ; TCC re response thereto	Discovery (Non-Deposition)
5/7/2024	Guy Wallace	0.4	\$1,350	\$540	com's with RLS re supplementation of Initial Disclosures; outreach script re FSP and access subclasses	Discovery (Non-Deposition)
5/7/2024	Guy Wallace	1.2	\$1,350	\$1,620	zoom with DTM; JGT; BU; MTJ re Dr. Saad's report; deposition schedule; responses thereto and next steps	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/7/2024	Guy Wallace	1.0	\$1,350	\$1,350	zoom with Dr. Barchuk; GG; AS; re expert report of Dr. Barchuk; issues re expert discovery and compliance with MJ Beeler's discovery orders	Experts (Including Retention)
5/7/2024	Guy Wallace	1.7	\$1,350	\$2,295	review and analysis of expert report of Dr. Saad	Experts (Including Retention)
5/7/2024	Guy Wallace	0.7	\$1,350	\$945	review and analysis of expert report of Josh Allen	Experts (Including Retention)
5/7/2024	Guy Wallace	0.3	\$1,350	\$405	com's with JAU re errata re Waters and Mastin reports; numbering issues	Experts (Including Retention)
5/7/2024	Jennifer Bybee	2.3	\$925	\$2,128	Review all errata served on Defendants for accuracy and email GBW re same	Experts (Including Retention)
5/7/2024	Mark Johnson	0.4	\$1,150	\$460	review and analyze letter from OC re proposed production and methodology for production of documents responsive to 4/25 discovery order.	Discovery (Non-Deposition)
5/7/2024	Mark Johnson	0.8	\$1,150	\$920	call w Wallace, joined by T Close (.3) re Rutner letter and responding to same re supplemental discovery per 4/25 discovery order.	Discovery (Non-Deposition)
5/7/2024	Mark Johnson	0.5	\$1,150	\$575	draft email response to OC Rutner, etc. re positions on docs and information to be produced per latest discovery order.	Discovery (Non-Deposition)
5/7/2024	Mark Johnson	0.7	\$1,150	\$805	call w/ G. Wallace re disputes with OC re discovery required by recent discovery order and responding to email from OC re same; timing of motions to compel, summary judgment motions, opposition to motion to certify class and impact on schedule	Discovery (Non-Deposition)
5/7/2024	Mark Johnson	1.7	\$1,150	\$1,955	zoom mtg w/ Marks, Wallace, Umpierre, Thornton re Rule 26 reports from Defendants' experts Saad and Allen, underlying data, strategy for responding to same, expert depositions.	Experts (Including Retention)
5/7/2024	Mark Johnson	0.7	\$1,150	\$805	calls (x3) w/ G Wallace re Saad and Allen expert reports	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/7/2024	Mark Johnson	1.6	\$1,150	\$1,840	further review of Saad Rule 26 expert report for Zoom call w/ Marks, Wallace, Umpierre, Thornton	Experts (Including Retention)
5/7/2024	Mark Johnson	0.1	\$1,150	\$115	email from J Thortons re underlying data for expert reports re San Ramon; email to OC re same.	Experts (Including Retention)
5/7/2024	Mark Johnson	1.2	\$1,150	\$1,380	work on mtn for reconsideration re Rubin, Omole depositions, Other Motions review prior orders and ltr briefs for same	
5/7/2024	Rachel Steyer	0.2	\$750	\$150	reviewing letter from OC outlining next steps in gathering and producing docs	Discovery (Non-Deposition)
5/7/2024	Rachel Steyer	3.6	\$750	\$2,700	completing review and updating of discovery index	Discovery (Non-Deposition)
5/7/2024	Rachel Steyer	0.5	\$750	\$375	reviewing draft Barchuk expert report	Experts (Including Retention)
5/7/2024	Travis Close	0.3	\$850	\$255	Review and analyze today's letter from John Bertino re: discovery production	Case Organization, Planning and Strategy
5/7/2024	Travis Close	0.4	\$850	\$340	Emails to MTJ, GBW re: misrepresentations in defendants' discovery letter	Case Organization, Planning and Strategy
5/7/2024	Travis Close	1.2	\$850	\$1,020	Begin drafting response to Def's discovery letter of May 6 re: supplementation (outline)	Case Organization, Planning and Strategy
5/7/2024	Travis Close	0.9	\$850	\$765	Legal research re: whether identities of former residents who are class members may be discovered pursuant to rule 23(b)(2)	Case Organization, Planning and Strategy
5/7/2024	Travis Close	1.4	\$850	\$1,190	Continue drafting response to Def's discovery letter of May 6 re: supplementation (categories 1-2)	Discovery (Non-Deposition)
5/7/2024	Travis Close	1.2	\$850	\$1,020	Kailes Rule 26 evidence analysis -- finish citations to depo witnesses re: emergency evacuation testimony	Experts (Including Retention)
5/7/2024	Travis Close	1.5	\$850	\$1,275	Kailes Rule 26 evidence analysis -- analyze testimony & add citations to declarations of plaintiffs and resident witnesses	Experts (Including Retention)
5/7/2024	Travis Close	1.6	\$850	\$1,360	Kailes Rule 26 evidence analysis -- analyze testimony & add citations to other filings in this case (Defendants' opposition and exhibits, complaint, answer, etc)	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/8/2024	Guy Wallace	2.1	\$1,350	\$2,835	analysis of current case schedule and com's with GG; MTJ re modification to same	Case Organization, Planning and Strategy
5/8/2024	Guy Wallace	0.3	\$1,350	\$405	com's with RAB re analysis of Residency Agreements (RA's) and opt-outs re arbitration for six facilities	Class Certification
5/8/2024	Guy Wallace	0.2	\$1,350	\$270	com's with TCC; RLS re class outreach scripts	Class Certification
5/8/2024	Guy Wallace	0.7	\$1,350	\$945	revise and edit draft class outreach script; com's with RLS re same	Discovery (Non-Deposition)
5/8/2024	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of Defendants' proposed production of documents; com's with MTJ re same and whether it sufficiently addresses the 56 categories	Discovery (Non-Deposition)
5/8/2024	Guy Wallace	1.3	\$1,350	\$1,755	review and analysis of expert report of Allen	Experts (Including Retention)
5/8/2024	Guy Wallace	0.2	\$1,350	\$270	review and analysis of com's from JGT re inclusion of contract labor in staffing models	Experts (Including Retention)
5/8/2024	Jennifer Bybee	0.5	\$925	\$463	Assemble new copy of Mastin Ex. I	Experts (Including Retention)
5/8/2024	Jennifer Bybee	2.3	\$925	\$2,128	Review G. Waters Rule 26 submission for accuracy	Experts (Including Retention)
5/8/2024	Jennifer Bybee	0.1	\$925	\$93	Email to GBW re Waters reports	Experts (Including Retention)
5/8/2024	Mark Johnson	0.2	\$1,150	\$230	call from client re assessment by Jennifer Gordon-Alvarez, reduction in personal services rate related to bathroom assistance, conflict with dementia patient "Frannie"	Case Organization, Planning and Strategy
5/8/2024	Mark Johnson	0.5	\$1,150	\$575	call w/ GBW re case schedule, open discovery, expert depo conflicts, potential request for extension of schedule.	Case Organization, Planning and Strategy
5/8/2024	Mark Johnson	0.6	\$1,150	\$690	call w/ GBW, joined by G Grunfeld, re need for extension of pre-trial and trial schedule, strategy for raising same	Case Organization, Planning and Strategy
5/8/2024	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re case schedule, discovery	Case Organization, Planning and Strategy
5/8/2024	Mark Johnson	0.3	\$1,150	\$345	draft proposed email to OC re case schedule, com w/ COC re same; exchange w/ OC	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/8/2024	Mark Johnson	0.5	\$1,150	\$575	work on developing new proposed pre-trial and trial schedule; email GBW and GCG re same	Case Organization, Planning and Strategy
5/8/2024	Mark Johnson	0.1	\$1,150	\$115	review and respond to emails from OC Rutner re discovery responsive to 7/25 discovery order.	Discovery (Non-Deposition)
5/8/2024	Mark Johnson	0.1	\$1,150	\$115	review email from T Close w definition of "other mobility device" for position on dispute re class definition and class list.	Discovery (Non-Deposition)
5/8/2024	Mark Johnson	0.4	\$1,150	\$460	review email from RLS re sample of documents that haven't been updated; research saved document production for others; email to RLS, GBW re same	Discovery (Non-Deposition)
5/8/2024	Mark Johnson	0.1	\$1,150	\$115	review email from J Thornton analyzing and rebutting expert opinion of A Saad re contract labor	Experts (Including Retention)
5/8/2024	Mark Johnson	0.1	\$1,150	\$115	review emails from J Thornton re expert availability for depositions	Experts (Including Retention)
5/8/2024	Mark Johnson	3.8	\$1,150	\$4,370	work on mtn for reconsideration of order denying Rubin and Omole depositions; review prior discovery orders and briefing for same.	Other Motions
5/8/2024	Rachel Steyer	2.9	\$750	\$2,175	reviewing Michael Johnson depo transcript and updating word doc compiling unknowns	Depositions
5/8/2024	Rachel Steyer	0.2	\$750	\$150	response to GBW, MTJ, TCC, JUB re categories of docs vis a vis supplementation	Discovery (Non-Deposition)
5/8/2024	Rachel Steyer	1.4	\$750	\$1,050	updating name plaintiff chart to include resident units and time spent in each	Misc. Research
5/8/2024	Travis Close	0.5	\$850	\$425	Email to MTJ re: analysis of definitions of OPDMD and wheelchairs per DOJ guidance and regulations	Case Organization, Planning and Strategy
5/8/2024	Travis Close	0.3	\$850	\$255	Email to June Kailes re: coordinating trip to facilities later this month	Case Organization, Planning and Strategy
5/8/2024	Travis Close	1.9	\$850	\$1,615	Continue drafting discovery letter response re: supplementation after court's order (categories 3-4)	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/8/2024	Travis Close	1.4	\$850	\$1,190	Continue drafting discovery letter response re: supplementation after court's order (categories 5-6)	Case Organization, Planning and Strategy
5/8/2024	Travis Close	0.5	\$850	\$425	Additions to outreach script re: emergency evacuation and planning	Case Organization, Planning and Strategy
5/8/2024	Travis Close	1.5	\$850	\$1,275	Additions to Doug Cross Rule 26 report (analysis of prohibitory language in all versions of the FSP)	Case Organization, Planning and Strategy
5/8/2024	Travis Close	0.3	\$850	\$255	Call with June kailes re: coordination of receipt of hard drive of files	Case Organization, Planning and Strategy
5/8/2024	Travis Close	0.2	\$850	\$170	Call with JUB re: additions to mastin and waters rule 26 reports	Case Organization, Planning and Strategy
5/8/2024	Travis Close	0.8	\$850	\$680	Plan & coordinate facility visits & plaintiff interviews to San Ramon and Scotts Valley with June Kailes	Experts (Including Retention)
5/8/2024	Travis Close	0.2	\$850	\$170	Email to JIK re: compendium of evidence for review	Experts (Including Retention)
5/9/2024	Guy Wallace	0.7	\$1,350	\$945	com's with RAB re analysis of Residency Agreements and language requiring the residents with disabilities pay for access improvements	Class Certification
5/9/2024	Guy Wallace	3.6	\$1,350	\$4,860	review and analysis of Defendants' letter of 5/7 re proposed approach to compliance with MJ Beeler's Order; revise and edit draft response from TCC re same	Discovery (Non-Deposition)
5/9/2024	Guy Wallace	0.9	\$1,350	\$1,215	com's with MTJ; TCC; RLS re response to Defendants' proposed production of material re MJ Beeler's Order; identification of deficiencies re same	Discovery (Non-Deposition)
5/9/2024	Guy Wallace	0.6	\$1,350	\$810	review and analysis of Allen Report; com's with JGT; BU re same	Experts (Including Retention)
5/9/2024	Mark Johnson	0.8	\$1,150	\$920	calls w/ GBW re anticipated motion practice and issues, discovery issues,	Case Organization, Planning and Strategy
5/9/2024	Mark Johnson	0.2	\$1,150	\$230	review GBW analysis of D position on documents they won't supplement, draft response re same.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/9/2024	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW re custodians for ESI proposed by Ds for compliance with discovery orders	Discovery (Non-Deposition)
5/9/2024	Mark Johnson	0.6	\$1,150	\$690	review D's proposed custodians for FSP related ESI search and other ESI searches; email exchanges w/ RLS and GBW and TCC re criteria for analyzing FSP custodians and results of analysis	Discovery (Non-Deposition)
5/9/2024	Mark Johnson	0.2	\$1,150	\$230	coms w/ RLS, GBW, TCC re Ds' recent responses to RFAs, Ds' RPDs re experts.	Discovery (Non-Deposition)
5/9/2024	Mark Johnson	0.2	\$1,150	\$230	review and respond to OC Rutner re alleged problems with underlying Schroyer expert data; email exchanges w/ COC Thornton and others re investigating same.	Experts (Including Retention)
5/9/2024	Mark Johnson	0.3	\$1,150	\$345	review email from J Thornton explaining issues with data and proposed corrections; draft email to OC based on same, further email with JT, edit draft email and send to OC	Experts (Including Retention)
5/9/2024	Mark Johnson	3.5	\$1,150	\$4,025	work on mtn for reconsideration of Order re Omole, Rubin depos	Other Motions
5/9/2024	Mark Johnson	1.5	\$1,150	\$1,725	further revisions to draft mtn for reconsideration of order denying Omole and Rubin depos; identify potential exhibits for declaration iso same; coms w/ RLS re finalizing same and preparing declaration	Other Motions
5/9/2024	Rachel Steyer	2.2	\$750	\$1,650	conducting class outreach; attempting to reach family members, leaving VMs, updating class list notes	Class Certification
5/9/2024	Rachel Steyer	0.2	\$750	\$150	reviewing internal correspondence re different categories of docs/whether to compel production	Discovery (Non-Deposition)
5/9/2024	Rachel Steyer	0.2	\$750	\$150	reviewing reasonable accommodation request form/process docs	Discovery (Non-Deposition)
5/9/2024	Rachel Steyer	0.3	\$750	\$225	response to MTJ, GBW, TCC re dates of proposed additional ED custodians	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/9/2024	Rachel Steyer	0.3	\$750	\$225	response to MTJ, GBW, TCC re # of wheelchair seats per facility vis a vis proposed custodians	Discovery (Non-Deposition)
5/9/2024	Rachel Steyer	0.2	\$750	\$150	response to MTJ, GBW, TCC re different facilities and ED dates	Discovery (Non-Deposition)
5/9/2024	Rachel Steyer	0.3	\$750	\$225	reviewing MTJ draft motion for reconsideration	Other Motions
5/9/2024	Rachel Steyer	0.6	\$750	\$450	drafting sponsoring declaration for motion for reconsideration	Other Motions
5/9/2024	Travis Close	0.6	\$850	\$510	Email to GBW re: analysis of BEST audit questions & data relevance with examples	Case Organization, Planning and Strategy
5/9/2024	Travis Close	0.8	\$850	\$680	Research regulations for plans of operations and review our existing productions of them	Case Organization, Planning and Strategy
5/9/2024	Travis Close	0.5	\$850	\$425	Email to Doug cross re: coordination of the next draft of rule 26 report	Case Organization, Planning and Strategy
5/9/2024	Travis Close	0.6	\$850	\$510	Review, analyze, and suggest additions to motion for reconsideration of depositions of Amole and Kelly Rubin	Case Organization, Planning and Strategy
5/9/2024	Travis Close	1.3	\$850	\$1,105	Continue drafting doug cross rule 26 report (securement systems, Q'Straint)	Case Organization, Planning and Strategy
5/9/2024	Travis Close	0.7	\$850	\$595	Emails to Doug Cross re: revisions needed to address improper legal conclusions	Experts (Including Retention)
5/9/2024	Travis Close	2.2	\$850	\$1,870	Revisions to rule 26 report of Cross to modify language making legal conclusions or applying regulations	Experts (Including Retention)
5/9/2024	Travis Close	1.7	\$850	\$1,445	Additions to Cross Rule 26 report (Brookdale's vehicles and vehicle inventory)	Experts (Including Retention)
5/10/2024	Guy Wallace	0.5	\$1,350	\$675	com's with GG; BU; MTJ re case schedule; expert reports	Case Organization, Planning and Strategy
5/10/2024	Guy Wallace	2.1	\$1,350	\$2,835	revise and edit letter to Defendants re production of documents and ESI re Order, ECF 778	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/10/2024	Guy Wallace	0.3	\$1,350	\$405	com's with TCC re letter to Defendants re compliance with discovery orders	Discovery (Non-Deposition)
5/10/2024	Guy Wallace	3.4	\$1,350	\$4,590	revise and edit draft letter to Defendants re compliance with ECF No. 788	Discovery (Non-Deposition)
5/10/2024	Guy Wallace	0.6	\$1,350	\$810	com's with BU; JGT; MTJ re Allen Report and responses thereto	Experts (Including Retention)
5/10/2024	Guy Wallace	1.7	\$1,350	\$2,295	revise and edit draft report of Dr. Barchuk; com's with GG; AS re same	Experts (Including Retention)
5/10/2024	Guy Wallace	0.2	\$1,350	\$270	com's with MTJ; RLS re motion for reconsideration	Other Motions
5/10/2024	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of draft of revised case schedule; revise and edit same	Trial and Pretrial Preparation
5/10/2024	Mark Johnson	0.2	\$1,150	\$230	review letter from TCC ,GBW re docs to be produced in response to recent discovery orders; email gbw re same.	Discovery (Non-Deposition)
5/10/2024	Rachel Steyer	0.2	\$750	\$150	weekly meeting with RBGG co-counsel, BSU, TCC to review and discuss tasks and assignments	Case Organization, Planning and Strategy
5/10/2024	Rachel Steyer	0.5	\$750	\$375	attempting to reach class members, leaving VMs	Class Outreach and Contact
5/10/2024	Rachel Steyer	0.4	\$750	\$300	call with daughter of current resident, scheduled intake	Class Outreach and Contact
5/10/2024	Rachel Steyer	0.2	\$750	\$150	call with conservator of current resident, declined to participate	Class Outreach and Contact
5/10/2024	Rachel Steyer	0.3	\$750	\$225	spoke with family member of current Scotts Valley resident, requested follow up call next week	Class Outreach and Contact
5/10/2024	Rachel Steyer	0.2	\$750	\$150	call with family member of former resident, scheduled intake call	Class Outreach and Contact
5/10/2024	Rachel Steyer	1.0	\$750	\$750	double checking notes/do not contact names and updating class outreach/member spreadsheet	Class Outreach and Contact
5/10/2024	Rachel Steyer	0.4	\$750	\$300	reviewing and editing draft TCC letter to opposing counsel re document production	Communications With Opposing Counsel
5/10/2024	Rachel Steyer	0.6	\$750	\$450	reviewing declarations for discussion of access fixes for GBW	Misc. Research

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/10/2024	Rachel Steyer	1.2	\$750	\$900	continued drafting of sponsoring declaration for motion for reconsideration	Other Motions
5/10/2024	Travis Close	0.8	\$850	\$680	Rental car reservation -- accessible van for picking up June Kailes and taking her to San Ramon and Scotts Valley facilities	Case Organization, Planning and Strategy
5/10/2024	Travis Close	0.5	\$850	\$425	Email to GG (co-counsel) re: analysis of policy document implementing the fleet safety policy from 2017	Case Organization, Planning and Strategy
5/10/2024	Travis Close	0.6	\$850	\$510	Flight Reservation -- fly to SJC airport for facilities' visit with June Kailes on May 28 and out of Oakland airport on May 29	Case Organization, Planning and Strategy
5/10/2024	Travis Close	0.6	\$850	\$510	Email to GG (co-counsel) re: analysis of revisions made to Rule 26 report to remove legal conclusions	Case Organization, Planning and Strategy
5/10/2024	Travis Close	0.4	\$850	\$340	Meeting with GG, other RBGG folks, RLS, re: expert reports and upcoming depositions	Case Organization, Planning and Strategy
5/10/2024	Travis Close	1.7	\$850	\$1,445	Revisions and additions to Cross rule 26 report (incorporating testimony from depo of Michael Johnson)	Case Organization, Planning and Strategy
5/10/2024	Travis Close	0.8	\$850	\$680	Finalize draft letter to defendants re: discovery supplementation	Case Organization, Planning and Strategy
5/10/2024	Travis Close	1.5	\$850	\$1,275	Revisions and additions to Cross rule 26 report (opinion: The Fleet Safety Policy Has Been Regularly and Routinely Enforced at the California Facilities During the Class Period)	Case Organization, Planning and Strategy
5/10/2024	Travis Close	1.4	\$850	\$1,190	Revisions to doug cross rule 26 report (photo references to securement equipment from surveys)	Experts (Including Retention)
5/11/2024	Guy Wallace	2.7	\$1,350	\$3,645	review and analysis of draft expert reports of Cross; Dr. Barchuk	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/11/2024	Travis Close	0.7	\$850	\$595	Review, analyze, propose revisions to latest version of draft Rule 26 report of Dr Barchuck & accompanying exhibits	Case Organization, Planning and Strategy
5/12/2024	Guy Wallace	3.3	\$1,350	\$4,455	review and analysis of draft expert report of Cross; revise and edit same	Experts (Including Retention)
5/12/2024	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of Allen expert report	Experts (Including Retention)
5/12/2024	Travis Close	1.7	\$850	\$1,445	Review and analyze edits by Cross to his rule 26 report; propose additional revisions and email to Cross	Experts (Including Retention)
5/12/2024	Travis Close	1.4	\$850	\$1,190	Call with Doug Cross re: walking through latest revisions to rule 26 report	Experts (Including Retention)
5/13/2024	Guy Wallace	1.0	\$1,350	\$1,350	review and analysis of Defendants' opposition brief re motion to certify subclasses; com's with MTJ re same	Class Certification
5/13/2024	Guy Wallace	1.3	\$1,350	\$1,755	prepare for and participate in meet and confer with ER; JB; JG; MJ; BU' TCC; AS re pretrial and trial schedule; compliance with discovery orders	Communications With Opposing Counsel
5/13/2024	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ re results of meet and confer with Defendants re pretrial and trial schedule; compliance with Court's discovery Orders, next steps re same	Communications With Opposing Counsel
5/13/2024	Guy Wallace	0.9	\$1,350	\$1,215	revise and edit expert report of Doug Cross	Experts (Including Retention)
5/13/2024	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of Allen report and opinion re varying impact of barriers on residents in assisted living facilities; legal research and analysis re class cert decisions re typicality and commonality and impact of barriers or unlawful conduct	Experts (Including Retention)
5/13/2024	Guy Wallace	2.2	\$1,350	\$2,970	review and analysis of expert report of Allen; com's with BU re same (.4)	Experts (Including Retention)
5/13/2024	Guy Wallace	0.4	\$1,350	\$540	com's with TCC; RLS re revisions to draft expert report of Cross	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/13/2024	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of Defendants' motion for "clarification" re definition of class re FSP; com's with MTJ re same	Other Motions
5/13/2024	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW re strategy for meet and confer w/ OC re pre-trial schedule, arguments likely to be made in opposition to class certification mtn and mtn for reconsideration of Omole and Rubin depositions.	Case Organization, Planning and Strategy
5/13/2024	Mark Johnson	1.0	\$1,150	\$1,150	meet and confer session w/ OC Rutner, Jacobsen, Bertino, Gravante and COC Wallace, Close, Spiegel re proposed modification of class schedule and outstanding disputes re discovery ordered on 7/25	Discovery (Non-Deposition)
5/13/2024	Mark Johnson	0.3	\$1,150	\$345	review Thornton draft response to D further inquiries re underlying expert data; coms w/ R Bonner and Thornton re opt-out list; draft email to OC with responses to inquiries..	Discovery (Non-Deposition)
5/13/2024	Mark Johnson	0.3	\$1,150	\$345	follow up calls w/ GBW re meet and confer w/ OC re discovery, mtgs for compliance w/ 7/25 discovery order.	Discovery (Non-Deposition)
5/13/2024	Mark Johnson	2.8	\$1,150	\$3,220	Review, edit and comment on Cross Rule 26 expert report	Experts (Including Retention)
5/13/2024	Mark Johnson	0.6	\$1,150	\$690	com w/ GBW re issues related to D Cross rule 26 expert report	Experts (Including Retention)
5/13/2024	Mark Johnson	0.5	\$1,150	\$575	Review D mtn for clarification of class definition and confer w GBW re same	Other Motions
5/13/2024	Mark Johnson	0.4	\$1,150	\$460	begin work on admin mtn for modification of schedule, confer w/ GBW re same.	Other Motions
5/13/2024	Rachel Steyer	0.4	\$750	\$300	call with Wendy DeMello to clarify upcoming schedule, case status update	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/13/2024	Rachel Steyer	0.2	\$750	\$150	spoke with daughter of current Brookdale resident, requested letter and will follow up	Class Outreach and Contact
5/13/2024	Rachel Steyer	0.6	\$750	\$450	attempted outreach to class members, leaving VMs	Class Outreach and Contact
5/13/2024	Rachel Steyer	0.3	\$750	\$225	received call back from family member of Brookdale San Ramon resident, discussed case, no major access/transportation issues to report	Class Outreach and Contact
5/13/2024	Rachel Steyer	0.2	\$750	\$150	received call back from family member of current Brookdale San Ramon resident, says no problems/happy camper	Class Outreach and Contact
5/13/2024	Rachel Steyer	1.7	\$750	\$1,275	reviewing expert reports for vehicle photos, transmitting info to TCC	Experts (Including Retention)
5/13/2024	Rachel Steyer	1.7	\$750	\$1,275	reviewing draft Cross expert report	Experts (Including Retention)
5/13/2024	Rachel Steyer	0.3	\$750	\$225	reviewing defendants entry of motion for reconsideration of class definition	Other Motions
5/13/2024	Rachel Steyer	1.4	\$750	\$1,050	reviewing defendants opposition papers	Other Motions
5/13/2024	Travis Close	0.3	\$850	\$255	Email to GBW re: agenda for teams meeting for today with defendants	Case Organization, Planning and Strategy
5/13/2024	Travis Close	2.2	\$850	\$1,870	Cross Rule 26 report -- revisions based on feedback from GBW	Case Organization, Planning and Strategy
5/13/2024	Travis Close	1.3	\$850	\$1,105	Additional revisions to Cross's Rule 26 report based on additional edits by team	Case Organization, Planning and Strategy
5/13/2024	Travis Close	1.2	\$850	\$1,020	Begin compiling list of documents considered - Cross Rule 26 (docs produced by Brookdale in discovery	Case Organization, Planning and Strategy
5/13/2024	Travis Close	1.0	\$850	\$850	Meet and confer with defendants re: trial and pretrial schedule; depositions; service alignment source code; and FSP discovery	Discovery (Non-Deposition)
5/13/2024	Travis Close	1.3	\$850	\$1,105	Insert revisions/additions to Cross report based on feedback from call yesterday evening	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/13/2024	Travis Close	0.7	\$850	\$595	Analysis of facility photos to determine wheelchair securement used on vehicles (Scotts Valley, Hemet, Oceanside, San Marcos, Chatsworth)	Experts (Including Retention)
5/14/2024	Guy Wallace	1.9	\$1,350	\$2,565	review and analysis of Defendants' opposition to Plaintiffs' motion for certification of subclasses	Class Certification
5/14/2024	Guy Wallace	2.1	\$1,350	\$2,835	review and analysis of Defendants' opposition to motion to certify subclasses; review and analysis of Anderson Declaration re same	Class Certification
5/14/2024	Guy Wallace	1.6	\$1,350	\$2,160	review and analysis of Defendants' arguments re numerosity; com's with JGT; BU; MTJ re same	Class Certification
5/14/2024	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of Defendants' class cert opposition brief; com's with JAU re preparation of sections re numerosity; Algarme	Class Certification
5/14/2024	Guy Wallace	0.6	\$1,350	\$810	com's with co-counsel; MTJ re schedule on class cert reply papers	Class Certification
5/14/2024	Guy Wallace	1.2	\$1,350	\$1,620	prepare for and participate in zoom with JY; BBK; AS; KS; MTJ; JAU; TCC; RLS re Defendants' class cert opposition and preparation of reply papers	Class Certification
5/14/2024	Guy Wallace	0.7	\$1,350	\$945	revise and edit motion for reconsideration re two depositions; com's with MTJ re same	Other Motions
5/14/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re opposition filed	Class Certification
5/14/2024	Jennifer Bybee	1.3	\$925	\$1,203	Review Defendants response in opposition to Mtn for Cert of Subclasses	Class Certification
5/14/2024	Jennifer Bybee	1.1	\$925	\$1,018	Zoom call with co-counsel re Defendants' Opposition	Class Certification
5/14/2024	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re numerosity section	Class Certification
5/14/2024	Jennifer Bybee	0.4	\$925	\$370	Review info from GBW re numerosity	Class Certification
5/14/2024	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW re issues and arguments presented in Anderson declaration	Class Certification
5/14/2024	Mark Johnson	0.6	\$1,150	\$690	call w/ GBW re issues raised by D opposition to certification of subclasses	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/14/2024	Mark Johnson	0.8	\$1,150	\$920	review and analyze Declaration of D Anderson iso D opp to certification of subclasses; review exhibits to same; download and do preliminary review of underlying docs, including photos and notes	Class Certification
5/14/2024	Mark Johnson	0.2	\$1,150	\$230	coms w/ RLS, GBW, others re review and management of D filings in opp to certification of access subclasses.	Class Certification
5/14/2024	Mark Johnson	1.2	\$1,150	\$1,380	team zoom call re class cert opp and our reply re subclasses, other motions, trial schedule, w/ GBW, Yelin, Steyer, Stilber, Close, Bybee, Bien-Kahn, Spiegel	Class Certification
5/14/2024	Mark Johnson	0.6	\$1,150	\$690	calls (x6) w/ GBW re issues raised by opp to mtn for certification of access subclasses	Class Certification
5/14/2024	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW re possible request for extension of time to file reply iso mtn for class cert of access claims.	Other Motions
5/14/2024	Mark Johnson	0.3	\$1,150	\$345	email exchange w/ COC BBK re allocation of work on reply iso mtn for certification of access claims, whether to seek extension of deadline	Other Motions
5/14/2024	Mark Johnson	0.8	\$1,150	\$920	work on mtn for modification of schedule	Other Motions
5/14/2024	Mark Johnson	3.0	\$1,150	\$3,450	revise mtn for reconsideration of denial of Omole and Rubin depositions and declaration iso same; review evidence and possible exhibits for same, including depo transcripts; coms w/ COC and staff re exhibits, mtn to seal exhibits	Other Motions
5/14/2024	Rachel Steyer	1.2	\$750	\$900	meeting with RBGG, GBW, MTJ, TCC, JUB to review and discuss defendants' opposition, upcoming tasks and assignments for reply	Case Organization, Planning and Strategy
5/14/2024	Rachel Steyer	0.2	\$750	\$150	call with GBW to review organization of defendants' opposition papers	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/14/2024	Rachel Steyer	1.6	\$750	\$1,200	downloading and organizing defendants' opposition filing, preparing chart	Class Certification
5/14/2024	Rachel Steyer	0.4	\$750	\$300	received call back from son of current resident, discussed case, scheduled intake	Class Outreach and Contact
5/14/2024	Rachel Steyer	0.3	\$750	\$225	follow up call with friend of current Brookdale Tracy resident, going to discuss with him and f/u	Class Outreach and Contact
5/14/2024	Rachel Steyer	0.2	\$750	\$150	attempted class outreach contact, left VMs	Class Outreach and Contact
5/14/2024	Rachel Steyer	0.2	\$750	\$150	call with friend of current resident, no major issues/not applicable	Class Outreach and Contact
5/14/2024	Rachel Steyer	0.4	\$750	\$300	partial intake call, rescheduled for later date	Class Outreach and Contact
5/14/2024	Rachel Steyer	0.4	\$750	\$300	reviewing/proofreading declaration and motion for reconsideration	Discovery (Non-Deposition)
5/14/2024	Rachel Steyer	2.0	\$750	\$1,500	reviewing waters expert reports for photos	Experts (Including Retention)
5/14/2024	Travis Close	1.3	\$850	\$1,105	Cross Rule 26 report -- edits in accordance with proposed revisions by MTJ	Case Organization, Planning and Strategy
5/14/2024	Travis Close	1.1	\$850	\$935	Cross Rule 26 report -- edits in accordance with proposed revisions by RLS	Case Organization, Planning and Strategy
5/14/2024	Travis Close	0.8	\$850	\$680	Review and analyze def's opposition to motion for class cert & supporting exhibits	Case Organization, Planning and Strategy
5/14/2024	Travis Close	1.2	\$850	\$1,020	Rule 26 report -- continue drafting list of evidence considered by Doug Cross (depo transcripts)	Case Organization, Planning and Strategy
5/14/2024	Travis Close	1.2	\$850	\$1,020	Meeting with GBW, MTJ, RLS, JAU, & co-counsel re: responding to Defendants' opposition iso motion for subclasses	Case Organization, Planning and Strategy
5/14/2024	Travis Close	1.7	\$850	\$1,445	Call with doug cross re: latest revisions to rule 26 report	Case Organization, Planning and Strategy
5/14/2024	Travis Close	1.0	\$850	\$850	Additional revisions to rule 26 report for Doug Cross (citations added to opinions about Brookdale vehicles having the right equipment & policies to secure all types of devices)	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/14/2024	Travis Close	1.2	\$850	\$1,020	Rule 26 report -- continue drafting list of evidence considered by Doug Cross (docs filed in litigation)	Experts (Including Retention)
5/15/2024	Guy Wallace	3.3	\$1,350	\$4,455	preparation of reply arguments re Defendants' opposition to motion to certify subclasses	Class Certification
5/15/2024	Guy Wallace	0.6	\$1,350	\$810	com's with Waters re Defendants' opposition to motion to certify subclasses; Declaration of Anderson; com's with MTJ re same	Class Certification
5/15/2024	Guy Wallace	0.9	\$1,350	\$1,215	com's with JAU re Defendants' argument re numerosity; analysis of same	Class Certification
5/15/2024	Guy Wallace	1.8	\$1,350	\$2,430	review and analysis of Defendants' opposition to motion to certify subclasses; legal research and analysis re same re classwide damages; alleged differences between class members re injuries / impact of barriers	Class Certification
5/15/2024	Guy Wallace	2.3	\$1,350	\$3,105	review and analysis of Defendants' opposition to motion to certify subclasses; preparation of reply arguments and points re same	Class Certification
5/15/2024	Guy Wallace	1.6	\$1,350	\$2,160	review and analysis of final draft of expert report of Doug Cross; com's with MTJ; TCC re same	Experts (Including Retention)
5/15/2024	Guy Wallace	1.4	\$1,350	\$1,890	review and analysis of Defendants' motion for clarification re FSP class; com's with JY; BBK re same	Other Motions
5/15/2024	Jennifer Bybee	0.2	\$925	\$185	Review com's with GBW and co-counsel re Reply brief	Class Certification
5/15/2024	Jennifer Bybee	2.3	\$925	\$2,128	Review background materials and conduct factual and legal research re numerosity	Class Certification
5/15/2024	Jennifer Bybee	0.4	\$925	\$370	Com's with GBW re numerosity	Class Certification
5/15/2024	Mark Johnson	0.3	\$1,150	\$345	email exchanges w/ OC Rutner re meet and confer on multiple issues, timing of filing application for modification of schedule; coms w/ GBW re same.	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/15/2024	Mark Johnson	0.1	\$1,150	\$115	Review email from M Uzeta re cases on assistance substituting for access.	Class Certification
5/15/2024	Mark Johnson	0.7	\$1,150	\$805	call w/ GBW re arguments made by D in opp to certification of access subclasses re damages, standing, Anderson declaration, modification on request, TransUnion argument	Class Certification
5/15/2024	Mark Johnson	0.6	\$1,150	\$690	further calls w/ GBW re D arguments on opp to certification of access subclasses and responses to same, including impact of individual damages on class cert.	Class Certification
5/15/2024	Mark Johnson	0.8	\$1,150	\$920	coms w/ GBW re reply arguments on mtn to certify access subclasses, cross declaration	Class Certification
5/15/2024	Mark Johnson	1.0	\$1,150	\$1,150	final review of Doug Cross expert report; coms w TCC and GBW re same	Experts (Including Retention)
5/15/2024	Mark Johnson	0.3	\$1,150	\$345	review Johnson depo transcript for passages related to direct threat analysis; coms w/ GBW, TCC re same	Experts (Including Retention)
5/15/2024	Mark Johnson	0.7	\$1,150	\$805	review proposed redactions for mtn for reconsideration of denial of Omole, Rubin depositions, review other exhibits for confidentiality designations, coms w/ J Yelin re same.	Other Motions
5/15/2024	Mark Johnson	4.7	\$1,150	\$5,405	review and analyze discovery mtn history for mtn for modification of schedule; continue drafting and revising mtn	Other Motions
5/15/2024	Rachel Steyer	0.6	\$750	\$450	attempted class outreach, left VMs, updated notes in spreadsheet	Class Outreach and Contact
5/15/2024	Rachel Steyer	0.2	\$750	\$150	spoke with family member of current resident, no mobility disability to note	Class Outreach and Contact
5/15/2024	Rachel Steyer	0.2	\$750	\$150	call with family member of current resident, requested follow up call, scheduled	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/15/2024	Rachel Steyer	1.5	\$750	\$1,125	email to TCC with additional photos identifying vehicle in expert reports	Experts (Including Retention)
5/15/2024	Rachel Steyer	1.7	\$750	\$1,275	reviewing additional expert reports from defendnats opposition filing	Other Motions
5/15/2024	Travis Close	0.6	\$850	\$510	Review and analyze defendants' motion for clarification on class definition & supporting exhibits	Case Organization, Planning and Strategy
5/15/2024	Travis Close	0.4	\$850	\$340	Email to MTJ re: testimony about direct threat in rule 26 report	Case Organization, Planning and Strategy
5/15/2024	Travis Close	0.3	\$850	\$255	Email to co-counsel re: serving rule 26 transportation expert reports at similar times	Case Organization, Planning and Strategy
5/15/2024	Travis Close	0.6	\$850	\$510	Upload rule 26 Cross report to signature software; send to Doug and receive signed copy after final review	Case Organization, Planning and Strategy
5/15/2024	Travis Close	0.8	\$850	\$680	Analyze testimony re: direct threat analysis in michael johnson deposition	Case Organization, Planning and Strategy
5/15/2024	Travis Close	0.7	\$850	\$595	Review and analyze additional emails marked 'hot' in new production under Johnson, Michael custodian for inclusion in list of docs considered by Doug Cross	Case Organization, Planning and Strategy
5/15/2024	Travis Close	1.3	\$850	\$1,105	Continue drafting list of documents considered (all docs listed in rule 26 report) for Douglas Cross report	Case Organization, Planning and Strategy
5/15/2024	Travis Close	1.3	\$850	\$1,105	Analysis of plaintiffs' and resident declarant testimony re: transportation services complaints, for inclusion in Cross rule 26 report	Case Organization, Planning and Strategy
5/15/2024	Travis Close	0.4	\$850	\$340	Review and analyze final, signed version of Dr. Barchuck report	Case Organization, Planning and Strategy
5/15/2024	Travis Close	0.2	\$850	\$170	Email to Doug Cross re: final draft of rule 26 report for review	Experts (Including Retention)
5/15/2024	Travis Close	2.1	\$850	\$1,785	Final revisions to Doug Cross rule 26 report	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/16/2024	Guy Wallace	2.4	\$1,350	\$3,240	review and analysis of Defendants' opposition brief re motion to certify subclasses; preparation of reply arguments and points re same	Class Certification
5/16/2024	Guy Wallace	0.4	\$1,350	\$540	review and analysis of Lemmons v. Ace Hardware; com's with MTJ re same	Class Certification
5/16/2024	Guy Wallace	0.9	\$1,350	\$1,215	com's with JGT; BU; MTJ; JAU re numerosity and Defendants' production of data re same	Class Certification
5/16/2024	Guy Wallace	1.3	\$1,350	\$1,755	preparation of initial outline of class cert reply	Class Certification
5/16/2024	Guy Wallace	0.7	\$1,350	\$945	com's with ER; JB; MJ; JG; MTJ; TCC re pretrial schedule; schedule on motion to certify subclasses; discovery	Communications With Opposing Counsel
5/16/2024	Guy Wallace	0.8	\$1,350	\$1,080	com's with Waters; Mastin re reply declarations re motion to certify subclasses	Experts (Including Retention)
5/16/2024	Guy Wallace	1.2	\$1,350	\$1,620	revise and edit draft Local Rule 7-11 motion re pretrial and trial schedule; com's with MTJ re same	Other Motions
5/16/2024	Guy Wallace	0.7	\$1,350	\$945	revise and edit declaration of MTJ in support of Administrative Motion re schedule; com's with MTJ re same	Other Motions
5/16/2024	Jennifer Bybee	0.3	\$925	\$278	Review email com's from GBW re current residents	Class Certification
5/16/2024	Jennifer Bybee	0.3	\$925	\$278	Review research in Kirola briefs re standing at class cert	Class Certification
5/16/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re numerosity argument	Class Certification
5/16/2024	Jennifer Bybee	2.1	\$925	\$1,943	Research re numerosity in cases where joinder impracticable due to unknown future class members	Class Certification
5/16/2024	Mark Johnson	0.4	\$1,150	\$460	meet and confer w/ OC Rutner, Jacobsen, Bertino, Gravante and COC Wallace, Close re timing of mtn to modify schedule, mtn for reconsideration, page limits on dispositive mtn and FSP custodians.	Case Organization, Planning and Strategy
5/16/2024	Mark Johnson	1.6	\$1,150	\$1,840	Draft stip and proposed order re extension of deadline for reply on subclass cert mtn; email GBW re same.	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/16/2024	Rachel Steyer	0.7	\$750	\$525	attempted to reach class members, left VMs, updated notes in spreadsheet	Class Outreach and Contact
5/16/2024	Rachel Steyer	0.3	\$750	\$225	spoke with family member of current resident, scheduled intake call	Class Outreach and Contact
5/16/2024	Rachel Steyer	0.3	\$750	\$225	call with daughter of current resident, discussed case, scheduled intake call	Class Outreach and Contact
5/16/2024	Rachel Steyer	1.5	\$750	\$1,125	conducted intake call with son of current resident	Class Outreach and Contact
5/16/2024	Rachel Steyer	0.2	\$750	\$150	followed up with family member of current resident, father does not have any mobility issues	Class Outreach and Contact
5/16/2024	Rachel Steyer	0.2	\$750	\$150	spoke with daughter of current resident, check in call scheduled next week	Class Outreach and Contact
5/16/2024	Rachel Steyer	1.6	\$750	\$1,200	reviewing production corresponding to potential additional EDs	Discovery (Non-Deposition)
5/16/2024	Rachel Steyer	0.3	\$750	\$225	reviewing draft MTJ admin motion to change schedule	Other Motions
5/16/2024	Rachel Steyer	0.4	\$750	\$300	reviewing draft MTJ decl and admin motion re change in schedule	Other Motions
5/16/2024	Travis Close	2.3	\$850	\$1,955	Review, analyze, and organize non-Brookdale produced docs from Cross's "list of documents considered" for production to Brookdale	Case Organization, Planning and Strategy
5/16/2024	Travis Close	0.3	\$850	\$255	Email to MTJ re: production of docs in Cross's rule 26 report to defendants	Case Organization, Planning and Strategy
5/16/2024	Travis Close	0.3	\$850	\$255	Email to Doug cross re: analysis of documents considered for materials not readily available	Case Organization, Planning and Strategy
5/16/2024	Travis Close	1.3	\$850	\$1,105	Legal research re: which documents must be disclosed to defendants in rule 26 report	Case Organization, Planning and Strategy
5/16/2024	Travis Close	0.7	\$850	\$595	Legal research re: whether an experts' notes must be disclosed with rule 26 reports	Case Organization, Planning and Strategy
5/16/2024	Travis Close	0.5	\$850	\$425	Draft summary of today's meeting with opposing counsel & and send to team & co-counsel with list of alternative custodians	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/16/2024	Travis Close	0.4	\$850	\$340	Verify current operation of Brookdale facilities for which we are proposing alternative custodians -- FSP discovery	Case Organization, Planning and Strategy
5/16/2024	Travis Close	0.4	\$850	\$340	Propose alternative EDs for 8 custodians selected by defendants	Case Organization, Planning and Strategy
5/16/2024	Travis Close	0.4	\$850	\$340	Prep for today's M/C with defendants re: case schedule extension, motion for reconsideration, discovery disputes	Communications With Opposing Counsel
5/16/2024	Travis Close	1.0	\$850	\$850	Meeting with MTJ and opposing counsel re: motion for reconsideration, FSP custodians, depositions, extension of schedule	Communications With Opposing Counsel
5/16/2024	Travis Close	1.4	\$850	\$1,190	Create compendium of evidence for sending to Douglas J. Cross for review	Experts (Including Retention)
5/17/2024	Guy Wallace	0.5	\$1,350	\$675	review and analysis of sample Residency Agreements and provision re Alterations, Section II.B	Discovery (Non-Deposition)
5/17/2024	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re schedule; Rubin deposition; Flores deposition; expert rebuttal reports	Discovery (Non-Deposition)
5/17/2024	Guy Wallace	2.4	\$1,350	\$3,240	review and analysis of initial draft of rebuttal report of Dr. Flores	Experts (Including Retention)
5/17/2024	Guy Wallace	0.6	\$1,350	\$810	zoom with Waters; Mastin; MTJ; JAU re preparation of reply declaration re motion to certify subclasses	Experts (Including Retention)
5/17/2024	Guy Wallace	0.5	\$1,350	\$675	com's with JGT; BU re Flores rebuttal report	Experts (Including Retention)
5/17/2024	Guy Wallace	1.5	\$1,350	\$2,025	review and analysis of 2024 Declaration of Anderson; preparation of responsive points	Experts (Including Retention)
5/17/2024	Guy Wallace	1.3	\$1,350	\$1,755	revise and edit draft rebuttal report of Dr. Flores; com's with BU re same	Experts (Including Retention)
5/17/2024	Guy Wallace	1.3	\$1,350	\$1,755	com's with GG; JY; BBK; AS; BU; MTJ; JAU; TCC re discovery; further motions to compel; expert reports and depositions; reply re motion to certify subclasses	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/17/2024	Guy Wallace	0.6	\$1,350	\$810	analysis of Defendants' arguments re alterations to certain resident units; com's with MTJ re same & issues re equivalent facilitation	Other Motions
5/17/2024	Jennifer Bybee	0.1	\$925	\$93	Send Teams invite for meeting with G. Waters and J. Mastin	Class Certification
5/17/2024	Jennifer Bybee	0.7	\$925	\$648	Teams call with GBW, MTJ, G. Waters and J. Mastin re response to Anderson declaration	Class Certification
5/17/2024	Mark Johnson	0.2	\$1,150	\$230	review email and proposed edits to stip from OC re time for filing subclass cert reply, make edits and coms w/ LEC, GBW re same.	Case Organization, Planning and Strategy
5/17/2024	Mark Johnson	0.1	\$1,150	\$115	email to OC re non-opposition to mtn to modify case schedule	Case Organization, Planning and Strategy
5/17/2024	Mark Johnson	0.3	\$1,150	\$345	review and analyze D's response to admin mtn to modify case schedule; confer w/ GBW re same.	Case Organization, Planning and Strategy
5/17/2024	Mark Johnson	0.7	\$1,150	\$805	video call w/ GBW, J Bybee, Waters and Mastin re reply declaration iso mtn for subclasses to rebut Anderson Declaration.	Class Certification
5/17/2024	Mark Johnson	0.3	\$1,150	\$345	review schedules and prior emails and draft email to OC re Dr. Flores' availability and proposed modifications in expert disclosure/discovery deadlines to address same	Class Certification
5/17/2024	Mark Johnson	1.5	\$1,150	\$1,725	video conference w / COC GBW, TCC, Umpierre, BBK, Edmundson, Stilber, Spiegel, Close re tasks and arguments on subclass cert reply; deposition schedules for experts, modifications to case schedule, follow up on disputes re scope of discovery order, mtn for clarification.	Class Certification
5/17/2024	Mark Johnson	1.2	\$1,150	\$1,380	review and analyze lease agreement w/ Scott's Valley and prepare memo re same	Class Certification
5/17/2024	Mark Johnson	0.5	\$1,150	\$575	research re equivalent facilitation.	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/17/2024	Travis Close	0.2	\$850	\$170	Email to MTJ re: folder for Doug's materials to share to defendants	Case Organization, Planning and Strategy
5/17/2024	Travis Close	1.7	\$850	\$1,445	Review and analyze articles & literature cited by Doug Cross for potential issues re: defense	Case Organization, Planning and Strategy
5/17/2024	Travis Close	1.8	\$850	\$1,530	Legal research re: coverage under ADA of operators who do not own facilities held to be inaccessible	Case Organization, Planning and Strategy
5/17/2024	Travis Close	0.2	\$850	\$170	Email to RAB re: follow-up with sending compendium of evidence to June Kailes	Case Organization, Planning and Strategy
5/17/2024	Travis Close	0.2	\$850	\$170	Email to doug cross re: potential nationwide effects for change in fleet safety policy	Case Organization, Planning and Strategy
5/17/2024	Travis Close	0.4	\$850	\$340	Review and analyze plaintiffs' response re: motion for prelim approval & supporting declarations	Case Organization, Planning and Strategy
5/17/2024	Travis Close	1.4	\$850	\$1,190	Meeting with GBW, MTJ, and co-counsel re: case schedule, depositions, motion for summary judgement, PRA requests	Case Organization, Planning and Strategy
5/18/2024	Guy Wallace	3.2	\$1,350	\$4,320	review and analysis of Defendants' opposition to motion to certify subclasses; preparation of reply arguments and points	Class Certification
5/18/2024	Guy Wallace	0.8	\$1,350	\$1,080	analysis of Defendants' arguments re Article III injury and equivalent facilitation; com's with MTJ re same	Class Certification
5/18/2024	Guy Wallace	0.7	\$1,350	\$945	analysis of Defendants' arguments re equivalent facilities and alleged individualized modifications	Class Certification
5/18/2024	Guy Wallace	2.9	\$1,350	\$3,915	review and analysis of draft expert rebuttal report of Dr. Flores; revise and edit same	Experts (Including Retention)
5/18/2024	Mark Johnson	0.6	\$1,150	\$690	Calls w/ GBW re D arguments in opp to certification of subclasses, including equivalent facilitation, variation in barriers, successor in interest and responses to same.	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/18/2024	Mark Johnson	0.8	\$1,150	\$920	draft piece for reply iso mtn for certification of subclasses on equivalent facilitation; review Ds brief, Anderson declaration and law for same	Class Certification
5/19/2024	Guy Wallace	3.2	\$1,350	\$4,320	review and analysis of Defendants' opposition to motion to certify subclasses; preparation of detailed summary of same	Class Certification
5/19/2024	Guy Wallace	1.6	\$1,350	\$2,160	preparation of notes re reply arguments and points re Defendants' opposition to subclasses motion; com's with MTJ re same (.5)	Class Certification
5/19/2024	Guy Wallace	1.5	\$1,350	\$2,025	preparation and drafting of preliminary outline of reply brief re motion to certify subclasses	Class Certification
5/19/2024	Guy Wallace	0.5	\$1,350	\$675	review and analysis of further draft of rebuttal report of Dr. Flores; com's with BU re same	Experts (Including Retention)
5/19/2024	Mark Johnson	0.6	\$1,150	\$690	call w/ GBW re issues and arguments on reply iso certification of subclasses.	Class Certification
5/20/2024	Guy Wallace	4.2	\$1,350	\$5,670	preparation and drafting of preliminary outline of reply brief re subclasses	Class Certification
5/20/2024	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of District Court opinion re class certification; issues re operator; access class; standing re damages	Class Certification
5/20/2024	Guy Wallace	1.3	\$1,350	\$1,755	review and analysis of Defendants' arguments re not an operator under ADA; lease agreements; com's with MTJ re responsive arguments re same	Class Certification
5/20/2024	Guy Wallace	0.6	\$1,350	\$810	review and analysis of rebuttal report of Dr. Flores; com's with BU; JAU re same	Experts (Including Retention)
5/20/2024	Guy Wallace	0.5	\$1,350	\$675	review and analysis of draft reply declaration of Maquis; com's with MTJ; RAB re same	Experts (Including Retention)
5/20/2024	Guy Wallace	0.9	\$1,350	\$1,215	preparation of outline of reply declaration of Waters; com's with Waters re same	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/20/2024	Guy Wallace	0.3	\$1,350	\$405	review and analysis of Order from J. Gilliam re schedule; com's with MTJ re same	Other Motions
5/20/2024	Mark Johnson	3.5	\$1,150	\$4,025	work on Marquis declaration re alteration clause, multiple calls and emails w/ R Bonner re same and underlying doc review process.	Class Certification
5/20/2024	Mark Johnson	0.5	\$1,150	\$575	call w/ GBW re responding to D argument re operators, control, lessors v lessees in class cert opposition,	Class Certification
5/20/2024	Mark Johnson	1.5	\$1,150	\$1,725	further conference w/ GBW re addressing D arguments re control, ownership and lessor/lessee responsibilities re access; review prior pleadings, exhibits and decision re same.	Class Certification
5/20/2024	Mark Johnson	0.1	\$1,150	\$115	email exchange w/ OC Rutner re expert depositions and schedule	Experts (Including Retention)
5/20/2024	Mark Johnson	0.2	\$1,150	\$230	review portions of Flores expert rebuttal report and coms w/ B Umpierre re same	Experts (Including Retention)
5/20/2024	Mark Johnson	0.1	\$1,150	\$115	call w/ B Umpierre re Flores expert rebuttal report on task times and frequencies	Experts (Including Retention)
5/20/2024	Rachel Steyer	0.3	\$750	\$225	call with Wendy DeMello to provide update about case schedule	Class Certification
5/20/2024	Rachel Steyer	1.2	\$750	\$900	attempts to reach class members/responsible parties, leaving VMs, updating notes in spreadsheet	Class Outreach and Contact
5/20/2024	Rachel Steyer	0.3	\$750	\$225	received call from individual who had googled SWCK re Brookdale, spoke about case and her issues, not applicable	Class Outreach and Contact
5/20/2024	Rachel Steyer	0.5	\$750	\$375	call with family member of current resident, discussed case and answered questions, scheduled further intake call	Class Outreach and Contact
5/20/2024	Rachel Steyer	0.2	\$750	\$150	response to MTJ, GBW, TCC re discovery items (tracking down and reviewing chart of resident files)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/20/2024	Rachel Steyer	2.6	\$750	\$1,950	reviewing new proposed ED custodians in production	Discovery (Non-Deposition)
5/20/2024	Rachel Steyer	0.2	\$750	\$150	reviewing draft GBW outline for reply motion and internal communications re RBGG assignments	Other Motions
5/20/2024	Travis Close	1.3	\$850	\$1,105	legal research whether differences in access standard applicable to each facility can defeat commonality at class certification	Case Organization, Planning and Strategy
5/20/2024	Travis Close	1.3	\$850	\$1,105	Legal research re: successor liability in ADA physical access cases	Case Organization, Planning and Strategy
5/20/2024	Travis Close	0.6	\$850	\$510	Review and analyze outline for Reply iso certification of subclasses by GBW	Class Certification
5/20/2024	Travis Close	2.4	\$850	\$2,040	Review, analyze, and organize compendium of evidence for douglas j cross - Rule 26 report (docs produced in discovery)	Experts (Including Retention)
5/20/2024	Travis Close	0.7	\$850	\$595	Review, analyze, and organize compendium of evidence for douglas j cross - Rule 26 report (deposition transcripts)	Experts (Including Retention)
5/20/2024	Travis Close	1.3	\$850	\$1,105	Review, analyze, and organize compendium of evidence for douglas j cross - Rule 26 report (access expert photographs)	Experts (Including Retention)
5/20/2024	Travis Close	0.6	\$850	\$510	Review, analyze, and organize compendium of evidence for douglas j cross - Rule 26 report (other facts and data)	Experts (Including Retention)
5/21/2024	Guy Wallace	2.3	\$1,350	\$3,105	legal research and analysis re Defendants' arguments that assistance with barriers is a legally cognizable argument against a new construction claim or a basis for denying damages to persons with mobility disabilities under Cal. Civ. Code section 55.56; com's with BU; JAU re same	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/21/2024	Guy Wallace	0.8	\$1,350	\$1,080	com's with BU; MTJ; JAU re Defendants' argument that some putative class members are "bedridden" and therefore do not use certain parts of the facility; counterarguments re same	Class Certification
5/21/2024	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ re Defendants' arguments that they are not the operators of the facilities; the "landlord" has responsibility and authority re barrier removal	Class Certification
5/21/2024	Guy Wallace	1.5	\$1,350	\$2,025	review and analysis of Defendants' opposition to motion to certify subclasses; preparation of fact research assignments for RLS and com's with RLS re same	Class Certification
5/21/2024	Guy Wallace	1.7	\$1,350	\$2,295	legal research and analysis of Defendants' arguments re injury and standing and misstatements of Ninth Circuit law re same; preparation of reply points re same	Class Certification
5/21/2024	Guy Wallace	3.1	\$1,350	\$4,185	preparation of chart of Defendants' arguments and responsive Ninth Circuit authorities re same	Class Certification
5/21/2024	Guy Wallace	1.7	\$1,350	\$2,295	preparation of outline of initial draft of reply declaration of Waters / Mastin re motion for subclasses	Experts (Including Retention)
5/21/2024	Jennifer Bybee	0.6	\$925	\$555	Draft list of barriers for GBW	Class Certification
5/21/2024	Mark Johnson	0.3	\$1,150	\$345	call w GBW re issues for reply iso certification of subclasses, including outline for Waters reply declaration, decisions re assistance, prevalence of wheelchair users in elderly population, Lytle closing the door on having to show class injury at class cert stage.	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/21/2024	Mark Johnson	0.7	\$1,150	\$805	Call w/ GBW re issues and arguments in opp to subclass certification mtn and response to same, including successor in interest issue under CBC and ADA, ownership/operation issue, lessors and lessees	Class Certification
5/21/2024	Mark Johnson	1.6	\$1,150	\$1,840	conferences w/ GBW re D arguments in opp to mtn for certification of subclasses and our response, their factual assertions, lessee identification and review of leases, status of lessees as affiliates	Class Certification
5/21/2024	Mark Johnson	3.0	\$1,150	\$3,450	review lease agreements cited by Ds in opp to certification of subclasses; add to memo re terms in each of six agreements based on same; prepare chart and compare to other docs and rog responses produced by Ds showing owners, lessors, lessees and licensees; coms w/ TCC and GBW re same.	Class Certification
5/21/2024	Mark Johnson	2.8	\$1,150	\$3,220	review, revise and finalize mtn for reconsideration of denial of Rubin, Omole depos; review, revise and finalize declaration iso mtn; reconcile exhibits; coms w LEC re finalizing, proposed order, coordinating w/ COC re sealing mtn.	Other Motions
5/21/2024	Mark Johnson	0.2	\$1,150	\$230	coms w/ COC Yelin re filing mtn for reconsideration, sealing mtn and items to be sealed	Other Motions
5/21/2024	Rachel Steyer	0.3	\$750	\$225	call with family member of current resident, discussed case, no access issues	Class Outreach and Contact
5/21/2024	Rachel Steyer	0.2	\$750	\$150	attempting to reach class members, leaving VMs, updating notes in spreadsheet	Class Outreach and Contact
5/21/2024	Rachel Steyer	1.2	\$750	\$900	conducted intake call with Denise Cotton	Class Outreach and Contact
5/21/2024	Rachel Steyer	0.2	\$750	\$150	confirming with GBW date of production of latest resident contact info	Class Outreach and Contact
5/21/2024	Rachel Steyer	1.1	\$750	\$825	conducted intake call with daughter of current Tracy resident	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/21/2024	Rachel Steyer	0.3	\$750	\$225	reviewing emails and docs for info re dates of ownership of facilities, responding to GBW, MTJ, TCC, JUB	Misc. Research
5/21/2024	Rachel Steyer	0.2	\$750	\$150	reviewing email from GBW outlining areas of fact research for reply brief	Other Motions
5/21/2024	Rachel Steyer	0.3	\$750	\$225	providing GBW and MTJ with fact research info for reply brief	Other Motions
5/21/2024	Rachel Steyer	2.6	\$750	\$1,950	researching questions for GBW re various fact questions for reply	Other Motions
5/21/2024	Travis Close	0.3	\$850	\$255	Emails to RAB re: redaction-identification features and issues with Relativity software	Case Organization, Planning and Strategy
5/21/2024	Travis Close	1.1	\$850	\$935	Review and analyze evidence of facility ownership in deposition transcripts & exhibits	Case Organization, Planning and Strategy
5/21/2024	Travis Close	0.2	\$850	\$170	Email to Doug Cross re trial date moved, deposition availability	Case Organization, Planning and Strategy
5/21/2024	Travis Close	1.3	\$850	\$1,105	Review and analyze recent production by brookdale for docs that were improperly redacted (emergency-evacuation related)	Discovery (Non-Deposition)
5/21/2024	Travis Close	1.2	\$850	\$1,020	Review and analyze recent production by brookdale for docs that were improperly redacted (transportation-complaint related)	Discovery (Non-Deposition)
5/21/2024	Travis Close	1.2	\$850	\$1,020	Review and analyze recent productions by brookdale for docs that were improperly redacted (staffing-complaint related)	Discovery (Non-Deposition)
5/21/2024	Travis Close	1.1	\$850	\$935	Cross, Douglas Rule 26 analysis - citations to relevant testimony in deposition transcripts (Algarne Vol 1, Algarne Vol 2, Ward, Reddy, Ataeian)	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/21/2024	Travis Close	1.1	\$850	\$935	Cross, Douglas Rule 26 analysis - citations to relevant testimony in deposition transcripts (Bernie Jestrabek-Hart, Helen Carlson, Michele Lytle, Rita Stiner, Stacia Stiner (Vol 1), Stacia Stiner (Vol 2))	Experts (Including Retention)
5/21/2024	Travis Close	1.3	\$850	\$1,105	Cross, Douglas Rule 26 analysis - citations to relevant testimony in deposition transcripts (Marie Harris, Niare Feaster, Ferdinand Buot, Jeffrey Toomer, Kevin Bowman, Audrey Withers, Carolyn Toolen, Dimple Kamdar	Experts (Including Retention)
5/22/2024	Guy Wallace	4.8	\$1,350	\$6,480	preparation of chart of Defendants' arguments and responsive Ninth Circuit case law and counterarguments	Class Certification
5/22/2024	Guy Wallace	2.9	\$1,350	\$3,915	legal research and analysis re Defendants' arguments and case law citations in opposition brief re certification of subclasses	Class Certification
5/22/2024	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ re Defendants' arguments re "customization"; redactions of lease agreements; assistance to class members	Class Certification
5/22/2024	Guy Wallace	0.4	\$1,350	\$540	com's with JAU re section re (b)(2) subclasses and numerosity	Class Certification
5/22/2024	Guy Wallace	0.5	\$1,350	\$675	review and analysis of documents identified by RLS re CAPEX and dollar thresholds re same; com's with RLS re same	Class Certification
5/22/2024	Guy Wallace	0.8	\$1,350	\$1,080	preparation of chart re Defendants' arguments and applicable authorities re counter arguments; use of claims forms; policy or practice arguments and requirements	Class Certification
5/22/2024	Guy Wallace	0.6	\$1,350	\$810	com's with Waters re Defendants' arguments re "customizations"; subsequent alterations to the facility; versions of CBC since 2014	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/22/2024	Jennifer Bybee	2.4	\$925	\$2,220	Draft section of Reply brief on numerosity	Class Certification
5/22/2024	Mark Johnson	0.2	\$1,150	\$230	coms w/ TCC re legal research on successors in interest and CBC violations	Class Certification
5/22/2024	Mark Johnson	0.9	\$1,150	\$1,035	review and revise draft Marquis declaration for reply iso class cert of access subclasses.	Class Certification
5/22/2024	Mark Johnson	2.7	\$1,150	\$3,105	work on Waters declaration iso reply iso mtn to certify access subclasses; review prior declarations and Anderson declaration for same.	Class Certification
5/22/2024	Mark Johnson	0.4	\$1,150	\$460	calls w/ GBW re arguments and case law for reply brief iso mtn for certification of facility level access subclasses.	Class Certification
5/22/2024	Mark Johnson	0.1	\$1,150	\$115	com w/ TCC re Doug Cross depo availability.	Experts (Including Retention)
5/22/2024	Mark Johnson	0.7	\$1,150	\$805	coms w/ J Yelin and Lourdes Castro re admin mtn to seal exhibits for mtn for reconsideration, review Rules re same	Other Motions
5/22/2024	Mark Johnson	0.4	\$1,150	\$460	review BKK draft of opposition to mtn for clarification of class cert defintiion and TCC comments re same; email with further comments.	Other Motions
5/22/2024	Mark Johnson	0.3	\$1,150	\$345	conferences w/ L Castro re finalization and filing of mtn for reconsideration and mtn to seal exhibits; review finals for filing.	Other Motions
5/22/2024	Rachel Steyer	0.2	\$750	\$150	received call back from Wendy DeMello, provided updated trial schedule/info	Class Outreach and Contact
5/22/2024	Rachel Steyer	1.5	\$750	\$1,125	reviewing production for capital budget docs	Discovery (Non-Deposition)
5/22/2024	Rachel Steyer	0.2	\$750	\$150	transmitting Capex docs to GBW	Discovery (Non-Deposition)
5/22/2024	Rachel Steyer	1.0	\$750	\$750	reviewing defendants' production of revised redacted lease documents	Discovery (Non-Deposition)
5/22/2024	Rachel Steyer	2.7	\$750	\$2,025	ongoing fact research questions and review for GBW for reply brief	Misc. Research

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/22/2024	Rachel Steyer	0.2	\$750	\$150	transmitting email to GBW and MTJ providing info and docs re capital expenditure fact research	Other Motions
5/22/2024	Rachel Steyer	0.7	\$750	\$525	reviewing depo excerpts to identify cites for GBW and MTJ	Other Motions
5/22/2024	Rachel Steyer	0.4	\$750	\$300	reviewing draft BBK response to motion for class definition/clarification	Other Motions
5/22/2024	Travis Close	0.2	\$850	\$170	Email to MTJ, GBW re: availability of Doug Cross for deposition	Case Organization, Planning and Strategy
5/22/2024	Travis Close	1.6	\$850	\$1,360	Legal research re: successor liability for compliance with physical access rules under the ADAAG/ADAS	Case Organization, Planning and Strategy
5/22/2024	Travis Close	1.8	\$850	\$1,530	Legal research re: successor owner's liability for compliance under California building code's accessibility provisions	Case Organization, Planning and Strategy
5/22/2024	Travis Close	1.9	\$850	\$1,615	Draft analysis of cases & authorities finding successor owner liable for physical access defects under CBC and ADA	Case Organization, Planning and Strategy
5/22/2024	Travis Close	0.3	\$850	\$255	Email to MTJ re: whether intentional discrimination can be established with successor owners	Case Organization, Planning and Strategy
5/22/2024	Travis Close	0.2	\$850	\$170	Review and analyze draft letters to plaintiffs re: updates on status of case	Case Organization, Planning and Strategy
5/22/2024	Travis Close	0.8	\$850	\$680	Add citations to list of documents considered for douglas cross (access barriers photos section)	Case Organization, Planning and Strategy
5/22/2024	Travis Close	0.5	\$850	\$425	Review, analyze, and propose edits to draft opposition to motion for clarification of class definition	Case Organization, Planning and Strategy
5/22/2024	Travis Close	0.3	\$850	\$255	Email to BBK (co-counsel) re: argument for broader class definition in opposition to motion for clarification	Case Organization, Planning and Strategy
5/23/2024	Guy Wallace	2.4	\$1,350	\$3,240	review and analysis of Defendants' arguments re policy and practice; use of claims form; individualized damages; legal research and analysis re same and preparation of responsive points	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/23/2024	Guy Wallace	3.3	\$1,350	\$4,455	revise and edit detailed outline of reply brief re motion to certify subclasses; com's with MTJ re same (.6)	Class Certification
5/23/2024	Guy Wallace	1.9	\$1,350	\$2,565	further analysis of Defendants' arguments re damages; legal research re same; revise and edit chart of authorities re same	Class Certification
5/23/2024	Mark Johnson	0.6	\$1,150	\$690	call w/ client re recent developments with staffing, services, update on case and case schedule	Case Organization, Planning and Strategy
5/23/2024	Mark Johnson	0.4	\$1,150	\$460	finalize Marquis declaration and emails with Marquis and Bonner and GBW re same.	Class Certification
5/23/2024	Mark Johnson	0.1	\$1,150	\$115	review Mastin list and description of categories of barriers for persons with vision disabilities.	Class Certification
5/23/2024	Mark Johnson	0.5	\$1,150	\$575	review and analyze GBW chart of D arguments and counter authorities for reply iso mtn for facility level access certification. com w/ GBW re same (.1)	Class Certification
5/23/2024	Mark Johnson	2.5	\$1,150	\$2,875	work on Waters declaration and review of materials for same.	Class Certification
5/23/2024	Mark Johnson	2.6	\$1,150	\$2,990	work on memo re lease agreements and analysis for same.	Class Certification
5/23/2024	Mark Johnson	0.7	\$1,150	\$805	review Brookhurst lease agreement and draft notes re same for memo on lease terms and control over repairs.	Class Certification
5/23/2024	Mark Johnson	0.5	\$1,150	\$575	calls w/ GBW re argument iso reply for certification of facility level classes.	Class Certification
5/23/2024	Mark Johnson	0.6	\$1,150	\$690	multiple email exchanges with OC Rutner re redacted lease agreements.	Discovery (Non-Deposition)
5/23/2024	Rachel Steyer	0.2	\$750	\$150	spoke w/niece of current resident, discussed case, no major relevant issues	Class Certification
5/23/2024	Rachel Steyer	1.1	\$750	\$825	attempted class outreach, leaving VMs, updating spreadsheet	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/23/2024	Rachel Steyer	0.3	\$750	\$225	spoke w/Terri and mother, decided to continue call after she can follow up on a few issues pertaining to transportation	Class Outreach and Contact
5/23/2024	Rachel Steyer	0.3	\$750	\$225	call with daughter of current resident, discussed case, agreed to later follow up call	Class Outreach and Contact
5/23/2024	Rachel Steyer	0.2	\$750	\$150	spoke with family member of current resident, discussed case, set up intake call	Class Outreach and Contact
5/23/2024	Rachel Steyer	3.1	\$750	\$2,325	identifying residents lacking any contact info, double checking residency agreements to verify	Class Outreach and Contact
5/23/2024	Rachel Steyer	0.5	\$750	\$375	reviewing revised draft of BBK motion/response to clarification of class definition	Other Motions
5/23/2024	Travis Close	1.8	\$850	\$1,530	Legal research re: California state court cases where previous owner was liable for building code requirements	Case Organization, Planning and Strategy
5/23/2024	Travis Close	0.8	\$850	\$680	Review, analyze & organize prior work and legal research on history of claims forms used in class action litigation	Case Organization, Planning and Strategy
5/23/2024	Travis Close	1.5	\$850	\$1,275	Call with June Kailes re: rule 26 evidence analysis & upcoming site visits	Case Organization, Planning and Strategy
5/23/2024	Travis Close	0.4	\$850	\$340	Research fire severity zones for plaintiffs' facilities	Case Organization, Planning and Strategy
5/23/2024	Travis Close	0.6	\$850	\$510	Review and analyze plaintiffs' facility property inspection reports to determine fire sprinkler systems for each	Case Organization, Planning and Strategy
5/23/2024	Travis Close	1.3	\$850	\$1,105	Site visit prep -- research history of evacuations in San Ramon during class period (2014-present)	Case Organization, Planning and Strategy
5/23/2024	Travis Close	0.3	\$850	\$255	Email to JIK re: schedule for upcoming depositions	Experts (Including Retention)
5/23/2024	Travis Close	1.3	\$850	\$1,105	Further edits to list of citations for rule 26 report of Douglas Cross & compendium of evidence	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/24/2024	Guy Wallace	2.3	\$1,350	\$3,105	preparation and drafting of reply re motion to certify subclasses; argument re varying access standards	Class Certification
5/24/2024	Guy Wallace	1.2	\$1,350	\$1,620	prepare for and participate in team zoom with JY; AS; KS; BU; MTJ; TCC; RLS re preparation of reply re subclasses motion; discovery	Class Certification
5/24/2024	Guy Wallace	1.5	\$1,350	\$2,025	preparation and drafting of argument re each of the six facilities is covered by a single minimum access standard for new construction; com's with Waters; Mastin; MTJ re same	Class Certification
5/24/2024	Guy Wallace	0.5	\$1,350	\$675	com's with Waters re 2010 ADAS is more stringent than 1991 ADAAG re access requirements; com's with ES and Mastin re same	Experts (Including Retention)
5/24/2024	Mark Johnson	0.6	\$1,150	\$690	call w/ R Stiner re recent developments, changes in charges, Stacy's issues at SR, revised case schedule.	Case Organization, Planning and Strategy
5/24/2024	Mark Johnson	0.3	\$1,150	\$345	Call w/ GBW re arguments for reply iso class cert of facilitiy subclasses re different standards issue and subsequent non-compliant alterations for previously compliant features.	Class Certification
5/24/2024	Mark Johnson	1.3	\$1,150	\$1,495	reviewing Fountaingrove lease agreement and continue drafting memo based on same re lease agreements.	Class Certification
5/24/2024	Mark Johnson	1.0	\$1,150	\$1,150	Team Zoom mtg w/ Wallace, Stilber, Spiegel, Edmundson, Umpierre, Steyer Yelin, Close re status of class cert reply, rental agreement analysis and argument, multiple standards issue, Declarations. Also, Kailes site visits to SR and SV, D's privilege log re lease agreements.	Class Certification
5/24/2024	Rachel Steyer	0.9	\$750	\$675	weekly zoom with RBGG, BSU, GBW, MTJ, TCC re ongoing tasks and assingments	Case Organization, Planning and Strategy
5/24/2024	Rachel Steyer	0.7	\$750	\$525	attempted class outreach, left VMs, updated notes in spreadsheet	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/24/2024	Rachel Steyer	0.3	\$750	\$225	call with daughter of current resident, discussed case, plan to follow up with mother	Class Outreach and Contact
5/24/2024	Rachel Steyer	0.2	\$750	\$150	returned missed call, spoke about case, scheduled intake call for next week	Class Outreach and Contact
5/24/2024	Rachel Steyer	0.2	\$750	\$150	reviewing defendants' privilege log	Discovery (Non-Deposition)
5/24/2024	Rachel Steyer	1.4	\$750	\$1,050	further review of production for relevant CapEx docs	Discovery (Non-Deposition)
5/24/2024	Rachel Steyer	2.9	\$750	\$2,175	reviewing defendants supplemental ROGs	Discovery (Non-Deposition)
5/24/2024	Travis Close	1.6	\$850	\$1,360	Legal research re: piercing the corporate veil in context of landlord/tenant REITs	Case Organization, Planning and Strategy
5/24/2024	Travis Close	1.3	\$850	\$1,105	Research cases where prior owner was sued by subsequent owner for defects in California state courts	Case Organization, Planning and Strategy
5/24/2024	Travis Close	0.3	\$850	\$255	Email to doug cross re: amended compendium of evidence for review	Case Organization, Planning and Strategy
5/24/2024	Travis Close	0.4	\$850	\$340	Call with MTJ re: next week's visit with plaintiff stacia stiner	Case Organization, Planning and Strategy
5/24/2024	Travis Close	0.7	\$850	\$595	Analysis of third-party building record production for San Ramon facility to determine design of fire system/sprinklers	Case Organization, Planning and Strategy
5/24/2024	Travis Close	0.8	\$850	\$680	Analysis of third-party building record production for Scotts Valley facility to determine design of fire system and other emergency-related elements	Case Organization, Planning and Strategy
5/24/2024	Travis Close	1.0	\$850	\$850	Meeting with GBW, MTJ, and RBGG co-counsel re: reply brief iso certification of subclasses; next week's site visits; discovery disputes	Case Organization, Planning and Strategy
5/24/2024	Travis Close	0.2	\$850	\$170	Email to June kailes re: hotel stay next tuesday in San Ramon	Case Organization, Planning and Strategy
5/24/2024	Travis Close	0.5	\$850	\$425	Review and analyze defendants' response re: motion for permanent injunction & accompanying declaration	Case Organization, Planning and Strategy
5/25/2024	Guy Wallace	2.1	\$1,350	\$2,835	preparation and drafting of reply brief re motion to certify subclasses	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/25/2024	Guy Wallace	2.6	\$1,350	\$3,510	preparation and drafting of section re plaintiffs are not required to challenge a written policy to meet commonality	Class Certification
5/25/2024	Guy Wallace	0.6	\$1,350	\$810	review and analysis of Defendants' supplemental responses to Plaintiffs' interrogatories pursuant to Court Order; com's with MTJ re same	Discovery (Non-Deposition)
5/25/2024	Mark Johnson	0.3	\$1,150	\$345	review recent Orders re schedule, revise pre-trial and trial schedule and com w/ COC re same	Case Organization, Planning and Strategy
5/25/2024	Mark Johnson	0.2	\$1,150	\$230	review GBW passage from draft brief re access standards and com re same and Waters declaration	Class Certification
5/25/2024	Mark Johnson	1.6	\$1,150	\$1,840	finalize analysis and memo re facility agreements cited by Defendants iso opp to class certification, email to COC re same	Class Certification
5/25/2024	Mark Johnson	0.3	\$1,150	\$345	review and analyze one set of Ds responses to interrogatories	Discovery (Non-Deposition)
5/25/2024	Mark Johnson	0.3	\$1,150	\$345	calls w GBW re Ds responses to access-related interrogatories and response to same	Discovery (Non-Deposition)
5/26/2024	Guy Wallace	3.7	\$1,350	\$4,995	preparation and drafting of reply brief re subclasses; issues re commonality	Class Certification
5/27/2024	Guy Wallace	3.7	\$1,350	\$4,995	preparation and drafting of reply brief re subclasses motion; sections re commonality	Class Certification
5/27/2024	Guy Wallace	2.1	\$1,350	\$2,835	preparation and drafting of reply brief re motion for subclasses; argument re successor liability	Class Certification
5/27/2024	Guy Wallace	2.1	\$1,350	\$2,835	preparation and drafting of reply brief re motion for subclasses; argument re customizations or allegedly individualized modifications to units; equivalent facilitation	Class Certification
5/27/2024	Guy Wallace	0.9	\$1,350	\$1,215	preparation and drafting of reply brief re motion to certify subclasses; argument re judicial estoppel	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/27/2024	Mark Johnson	0.1	\$1,150	\$115	review emails from J Mastin re points for response to Anderson dec iso opp to class cert of subclasses, barriers for vision disabilities.	Class Certification
5/27/2024	Mark Johnson	0.3	\$1,150	\$345	coms w/ J Bybee and G Wallace re Algarne standing argument; search for and share prior letter brief on issue, email communications and Algarne declaration.	Class Certification
5/27/2024	Mark Johnson	4.0	\$1,150	\$4,600	work on Waters expert declaration iso reply iso mtn for subclass certification; review Anderson declaration for same	Class Certification
5/27/2024	Mark Johnson	0.3	\$1,150	\$345	review email from OC Bertino re production and download docs; coms w/ R Bonner re same; follow-up with Bertino re production and re non-responsive interrogatories'.	Discovery (Non-Deposition)
5/28/2024	Guy Wallace	1.6	\$1,350	\$2,160	preparation and drafting of reply brief re motion to certify subclasses; argument re Defendants' duty to remove ADAAG and CBC violations, policy of requiring resident to pay for barrier removal	Class Certification
5/28/2024	Guy Wallace	3.6	\$1,350	\$4,860	preparation and drafting of reply brief re certification of subclasses; sections re policy or requiring residents to pay for access fixes; damages	Class Certification
5/28/2024	Guy Wallace	2.3	\$1,350	\$3,105	preparation and drafting of reply brief re motion to certify subclasses; sections re injury and damages	Class Certification
5/28/2024	Jennifer Bybee	0.8	\$925	\$740	Draft section on J. Algarne standing	Class Certification
5/28/2024	Jennifer Bybee	1.3	\$925	\$1,203	Read City's Opposition to Mtn re Phase 2 Facilities	Other Motions
5/28/2024	Mark Johnson	0.6	\$1,150	\$690	calls w/ GBW re damages arguments for reply iso certification of subclasses	Class Certification
5/28/2024	Mark Johnson	5.5	\$1,150	\$6,325	work on Waters declaration iso reply for mtn to certify subclasses.	Class Certification
5/28/2024	Mark Johnson	0.3	\$1,150	\$345	coms w/ COC re D posiiton on rog responses, prior meet and confer sessions; review notes re same.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/28/2024	Mark Johnson	1.5	\$1,150	\$1,725	email exchanges w/ OC Rutner re respective positions on Ds failure to produce responsive rog responses on access issues.	Discovery (Non-Deposition)
5/28/2024	Mark Johnson	0.2	\$1,150	\$230	review Bertino email re alleged missing data for expert reports; com w/ J Thornton and others re same	Experts (Including Retention)
5/28/2024	Mark Johnson	0.1	\$1,150	\$115	com w/ J Yellin, others re opp to D mtn to enlarge MSJ page limit to 50 pages	Other Motions
5/28/2024	Mark Johnson	0.3	\$1,150	\$345	review and analyze D mtn to enlarge page limit on dispositive mtn to 50 pages, com w/ GBW re same.	Other Motions
5/28/2024	Rachel Steyer	0.2	\$750	\$150	scheduled call with son of current resident, discussed case, did not wish to participate further	Class Outreach and Contact
5/28/2024	Rachel Steyer	0.2	\$750	\$150	attempting class outreach, leaving VMs, updating notes in spreadsheet	Class Outreach and Contact
5/28/2024	Rachel Steyer	0.2	\$750	\$150	reviewing communications with opposing counsel re latest production and responses to ROGs	Communications With Opposing Counsel
5/28/2024	Rachel Steyer	0.2	\$750	\$150	reviewing furhter communications between MTJ and OC concerning responses to ROGs	Communications With Opposing Counsel
5/28/2024	Rachel Steyer	1.6	\$750	\$1,200	reviewing latest ESI production	Discovery (Non-Deposition)
5/28/2024	Rachel Steyer	0.8	\$750	\$600	reviewing MTJ memo re lease documents	Misc. Research
5/28/2024	Rachel Steyer	0.2	\$750	\$150	reviewing defendants' admin motion to enlarge page number	Other Motions
5/28/2024	Rachel Steyer	1.1	\$750	\$825	reviewing defendants' opposition for facts in record/cited re instances of	Other Motions
5/28/2024	Rachel Steyer	0.7	\$750	\$525	further review of defendants' opposition brief and evidence for # of times defendants paid for access fixes	Other Motions
5/28/2024	Rachel Steyer	0.9	\$750	\$675	reviewing Flores declarations to ascertain # of mobility disability figures for GBW	Other Motions
5/28/2024	Travis Close	0.7	\$850	\$595	Review and analyze memo by MTJ re: lease agreement analysis for the six facilities	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/28/2024	Travis Close	0.3	\$850	\$255	Email to MTJ re: schedule of site visits to Brookdale San Ramon and Scotts Valley with June Kailes	Case Organization, Planning and Strategy
5/28/2024	Travis Close	1.5	\$850	\$1,275	Travel from home to SEA airport (June Kailes facility site visit)	Discovery (Non-Deposition)
5/28/2024	Travis Close	4.7	\$850	\$3,995	Facility site visit w June Kailes -- checking into Seatac airport, luggage, security, boarding at gate, and flight to San Jose airport	Experts (Including Retention)
5/28/2024	Travis Close	0.6	\$850	\$510	Facility site visit w June Kailes -- travel from San Jose airport to Moibility Works in Santa Clara to pickup accessible rental minivan	Experts (Including Retention)
5/28/2024	Travis Close	1.0	\$850	\$850	Facility site visit w June Kailes -- travel from Santa Clara to Oakland airport to pick up June Kailes	Experts (Including Retention)
5/28/2024	Travis Close	0.8	\$850	\$680	Facility site visit w June Kailes -- travel from Oakland airport to San Ramon to marriott hotel	Experts (Including Retention)
5/28/2024	Travis Close	1.0	\$850	\$850	Facility site visit w June Kailes -- meet with June to discuss strategy/plans for tomorrow's site visits	Experts (Including Retention)
5/28/2024	Travis Close	1.0	\$850	\$850	Facility site visit w June Kailes -- rental car reservation at Mobility Works in Santa Clara; insurance verification and car pickup/ramp and wheelchair tie-down demonstration	Experts (Including Retention)
5/29/2024	Guy Wallace	3.6	\$1,350	\$4,860	preparation and drafting of reply brief re certification of subclasses; arguments re (b)(3) certification, damages and injury	Class Certification
5/29/2024	Guy Wallace	1.2	\$1,350	\$1,620	revise and edit outline and structure of reply brief	Class Certification
5/29/2024	Guy Wallace	6.4	\$1,350	\$8,640	preparation of initial draft of reply brief re motion to certify subclasses	Class Certification
5/29/2024	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re Kailes and visit with Stacy Stiner; draft Waters reply declaration	Experts (Including Retention)
5/29/2024	Mark Johnson	0.4	\$1,150	\$460	calls w/ GBW re reply brief iso certification of subclasses, GBW declaration, waters declaration	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/29/2024	Mark Johnson	0.5	\$1,150	\$575	preliminary review of first draft of reply brief iso certification of sub classes	Class Certification
5/29/2024	Mark Johnson	2.8	\$1,150	\$3,220	work on and finalize draft of Waters declaration iso reply on mtn for certification of subclasses.	Class Certification
5/29/2024	Mark Johnson	0.4	\$1,150	\$460	email exchanges w/ OC E Rutner re San Ramon visit, disagreement over same.	Discovery (Non-Deposition)
5/29/2024	Mark Johnson	0.4	\$1,150	\$460	further email exchange w/ OC Rutner re inadequate discovery responses.	Discovery (Non-Deposition)
5/29/2024	Mark Johnson	1.0	\$1,150	\$1,150	Travel to and from Brookdale San Ramon for meeting with T Close, client S Stiner and Expert June Kailes	Experts (Including Retention)
5/29/2024	Mark Johnson	3.0	\$1,150	\$3,450	mtg at Brookdale San Ramon w/ expert June Kailes, client S Stiner and T Close	Experts (Including Retention)
5/29/2024	Mark Johnson	0.1	\$1,150	\$115	review email from clerk re courtesy copies of mtn for reconsideration, respond to same and com w/ L Castro re filing	Other Motions
5/29/2024	Mark Johnson	0.2	\$1,150	\$230	review D mtn to seal docs filed with P mtn for reconsideration	Other Motions
5/29/2024	Rachel Steyer	0.4	\$750	\$300	received call back from granddaughter of current resident, discussed case, scheduled intake	Class Outreach and Contact
5/29/2024	Rachel Steyer	1.0	\$750	\$750	reviewing draft reply brief and RBGG/GBW inserts	Other Motions
5/29/2024	Rachel Steyer	4.5	\$750	\$3,375	reviewing capex docs for further info	Other Motions
5/29/2024	Rachel Steyer	0.7	\$750	\$525	reviewing/proofreading draft Waters expert reply declaration ISO motion for cert. of subclasses	Other Motions
5/29/2024	Travis Close	0.8	\$850	\$680	June Kailes facility visit -- drive to San Ramon facility from hotel with June; meet with MTJ outside San Ramon facility to discuss objectives of today's visit	Experts (Including Retention)
5/29/2024	Travis Close	2.0	\$850	\$1,700	June Kailes facility visit -- visit San Ramon facility, interview with Stacy Stiner, tour of stairwells and exits	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/29/2024	Travis Close	1.9	\$850	\$1,615	June Kailes facility visit -- travel from San Ramon to Scotts Valley; quick lunch with June before visit to Scotts Valley facility	Experts (Including Retention)
5/29/2024	Travis Close	2.5	\$850	\$2,125	June Kailes facility visit -- visit at Scotts Valley facility; interview with Bernie Jestrabek-Hart	Experts (Including Retention)
5/29/2024	Travis Close	1.6	\$850	\$1,360	June Kailes facility visit -- drive from Scotts Valley to San Jose; drop off June at SJ Airport; return accessible van to Mobility Works in Santa Clara	Experts (Including Retention)
5/29/2024	Travis Close	1.9	\$850	\$1,615	June Kailes facility visit - travel to Oakland airport (Uber from mobility works to Milpitas BART station, BART to Oakland airport)	Experts (Including Retention)
5/30/2024	Guy Wallace	0.6	\$1,350	\$810	com's with JAU re reply brief re motion to certify subclasses; review and analysis of JAU redline	Class Certification
5/30/2024	Guy Wallace	1.3	\$1,350	\$1,755	revise and edit draft reply brief re motion to certify subclasses; com's with JY; BBK; MTJ re same	Class Certification
5/30/2024	Guy Wallace	0.8	\$1,350	\$1,080	zoom with JY; BBK; AS; MTJ; JAU; TCC; RLS re preparation of reply papers re motion to certify subclasses	Class Certification
5/30/2024	Guy Wallace	0.7	\$1,350	\$945	revise and edit reply brief re certification of subclasses	Class Certification
5/30/2024	Guy Wallace	0.6	\$1,350	\$810	com's with JY; RLS re exhibits for Wallace Reply Declaration; review and analysis of initial draft of same	Class Certification
5/30/2024	Guy Wallace	1.2	\$1,350	\$1,620	review and analysis of draft reply declaration of Waters	Experts (Including Retention)
5/30/2024	Guy Wallace	0.5	\$1,350	\$675	com's with Waters re reply declaration and analysis of Anderson Declaration, including exhibit 2	Experts (Including Retention)
5/30/2024	Guy Wallace	0.8	\$1,350	\$1,080	com's with Waters; Mastin; MTJ re reply declarations re motion to certify subclasses	Experts (Including Retention)
5/30/2024	Guy Wallace	1.1	\$1,350	\$1,485	com's with MTJ re Anderson declaration and response to Exhibits thereto; draft Waters reply declaration	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/30/2024	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of draft Waters declaration; preparation of email to MTJ re additional points to be added	Experts (Including Retention)
5/30/2024	Jennifer Bybee	0.2	\$925	\$185	Review emails re discovery and reply briefing	Class Certification
5/30/2024	Jennifer Bybee	3.7	\$925	\$3,423	Create redline edit of Reply brief	Class Certification
5/30/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re reply brief draft	Class Certification
5/30/2024	Jennifer Bybee	0.7	\$925	\$648	Zoom call with co-counsel re reply briefing and status check in re same	Class Certification
5/30/2024	Mark Johnson	1.4	\$1,150	\$1,610	Draft letters to Rita and Stacy Stiner re updated schedule, trial and motion issues and developments.	Case Organization, Planning and Strategy
5/30/2024	Mark Johnson	1.0	\$1,150	\$1,150	video conference w/ Mastin, Waters, Wallace re expert declarations for reply iso of certification of subclasses.	Class Certification
5/30/2024	Mark Johnson	0.7	\$1,150	\$805	work on language for Jestrabek-Hart declaration for reply iso mtn to certify subclasses; com w/ COC re same	Class Certification
5/30/2024	Mark Johnson	0.8	\$1,150	\$920	Zoom meeting w/ Wallace, Edmundson, Yelin, Bien Kahn, Spiegel, Close, Steyer re progress and status on components of reply papers iso mtn to certify subclasses, legal issues and arguments, client declaration, exhibits to Wallace declaration.	Class Certification
5/30/2024	Mark Johnson	1.1	\$1,150	\$1,265	multiple (calls w/ GBW re issues on reply brief, contents of Anderson declaration and Waters/Mastin reply declarations.	Class Certification
5/30/2024	Mark Johnson	1.4	\$1,150	\$1,610	review initial drafts of reply brief and RBGG edits and comments iso mtn to certify subclasses	Class Certification
5/30/2024	Mark Johnson	1.2	\$1,150	\$1,380	work on reply declaration of J Mastin iso mtn for certification of subclasses.	Class Certification
5/30/2024	Mark Johnson	1.2	\$1,150	\$1,380	revise and add to Waters reply declaration iso mtn for certification of subclasses.	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/30/2024	Rachel Steyer	0.7	\$750	\$525	meeting to review and discuss progress on reply brief with GBW, MTJ, JUB, TCC, JSY, AS, BBK	Case Organization, Planning and Strategy
5/30/2024	Rachel Steyer	0.2	\$750	\$150	received call from family member of former resident, discussed case, said she would review residency agreement and call back for furhter F/U	Class Outreach and Contact
5/30/2024	Rachel Steyer	1.5	\$750	\$1,125	reviewing prodcuton for evidentiary support for access fixes	Discovery (Non-Deposition)
5/30/2024	Rachel Steyer	0.2	\$750	\$150	email to BBK re question/clarification about capex documents sought for reply brief	Other Motions
5/30/2024	Rachel Steyer	0.3	\$750	\$225	reviewing BBK and JSY comments/edits to draft reply brief	Other Motions
5/30/2024	Rachel Steyer	2.0	\$750	\$1,500	reviewing and gathering invoices/supporting docs for named plaintiffs' units	Other Motions
5/30/2024	Rachel Steyer	0.2	\$750	\$150	additional email to GBW, MTJ, TCC, JUB, BSU, RBGG co-counsel transmitting name plaintiff docs re residential units	Other Motions
5/30/2024	Rachel Steyer	0.3	\$750	\$225	call with GBW to review and discuss research into various facts re record of access fixes	Other Motions
5/30/2024	Rachel Steyer	0.2	\$750	\$150	response to RBGG, GBW, MTJ, TCC, JUB re admin motion for page limits for MSJ motiosn	Other Motions
5/30/2024	Rachel Steyer	0.2	\$750	\$150	response to RBGG, GBW, MTJ, TCC, JUB re cap-ex docs/using DDO Playbook	Other Motions
5/30/2024	Travis Close	0.8	\$850	\$680	Team meeting re: reply brief iso motion for certification of subclasses	Case Organization, Planning and Strategy
5/30/2024	Travis Close	1.4	\$850	\$1,190	Draft memo to MTJ, GBW re: yesterday's site visits to san ramon and scotts valley	Case Organization, Planning and Strategy
5/30/2024	Travis Close	0.2	\$850	\$170	Email to GBW re: communications with executive directors at yesterday's facility site visits	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/30/2024	Travis Close	1.6	\$850	\$1,360	Research floor plans and locations of units for plaintiffs & witness declarants at scotts valley and san ramon facilities	Case Organization, Planning and Strategy
5/30/2024	Travis Close	4.2	\$850	\$3,570	June Kailes facility visit - check-in at airport, luggage, gate, boarding, and flight to SeaTac airport	Experts (Including Retention)
5/31/2024	Guy Wallace	3.8	\$1,350	\$5,130	preparation of further draft of reply brief re certification of subclasses	Class Certification
5/31/2024	Guy Wallace	1.9	\$1,350	\$2,565	preparation of further draft of reply brief re motion to certify subclasses	Class Certification
5/31/2024	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of further proposed edits from BBK; JAU re draft of reply brief re motion to certify subclasses	Class Certification
5/31/2024	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ re Jestrabek-Hart and reply declaration re Anderson, Exhibits 2 and 3	Class Certification
5/31/2024	Guy Wallace	0.8	\$1,350	\$1,080	zoom with JY; BBK; AS; MTJ; JAU; TCC; RLS re preparation of reply re motion to certify subclasses; D's motion for sanctions	Class Certification
5/31/2024	Guy Wallace	1.2	\$1,350	\$1,620	review and analysis of draft reply brief re motion to certify subclasses; preparation of further revisions re same	Class Certification
5/31/2024	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of Defendants' motion for sanctions; com's with MTJ re same	Other Motions
5/31/2024	Jennifer Bybee	0.2	\$925	\$185	Review emails with co-counsel re draft reply brief materials	Class Certification
5/31/2024	Jennifer Bybee	0.7	\$925	\$648	Zoom meeting with co-counsel re Reply brief and associated materials and motion for sanctions	Class Certification
5/31/2024	Jennifer Bybee	2.7	\$925	\$2,498	Create redline edit of Reply Brief iso Mtn. for Cert of Subclasses	Class Certification
5/31/2024	Jennifer Bybee	0.5	\$925	\$463	Review Mtn for Sanctions and supporting declarations	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/31/2024	Mark Johnson	0.7	\$1,150	\$805	Zoom mtg of team w/ GBW, Umpierre, Steyer, Close, Bien Kahn, Yelin, Spiegel re Reply brief iso subclass mtn and related papers; mtn for sanctions filed by Defendants.	Case Organization, Planning and Strategy
5/31/2024	Mark Johnson	0.3	\$1,150	\$345	coms w/ GBW re latest draft of reply brief is certification of subclasses, issues to cut from same; analysis of landlord tenant issue.	Class Certification
5/31/2024	Mark Johnson	0.3	\$1,150	\$345	calls w/ GBW re Waters declaration, conversation w/ client Jestrabek-Hart and related declaration for class cert reply on subclasses	Class Certification
5/31/2024	Mark Johnson	0.7	\$1,150	\$805	conference call w/ client Bernie Jestrabek-Hart and COC Spiegel re Anderson declaration, photos and declaration from her.	Class Certification
5/31/2024	Mark Johnson	0.2	\$1,150	\$230	follow-up call w/ A Spiegel re JBH declaration for reply iso subclass certification mtn	Class Certification
5/31/2024	Mark Johnson	0.5	\$1,150	\$575	analyze and compile chart of photos in Anderson declaration exhibit 2; coms w/ RLS and TCC re comparisons to P expert reports, review results of same.	Class Certification
5/31/2024	Mark Johnson	0.8	\$1,150	\$920	review and draft revisions to Jestrabek-Hart declaration; coms w/ COC Spiegel, Yelin, Wallace re same, review further revisions from Spiegel and coms re resident moving issue	Class Certification
5/31/2024	Mark Johnson	0.8	\$1,150	\$920	review part of latest revision to reply brief on subclass cert and work on piece re tenant responsibility per leases	Class Certification
5/31/2024	Mark Johnson	3.2	\$1,150	\$3,680	prepare revised version of Waters declaration iso class cert reply for subclasses.	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/31/2024	Mark Johnson	0.3	\$1,150	\$345	Coms w/ J Thornton and R Bonner re production of additional files related to medmodel analysis and explanation of data selection process; preparing link for same and email to Defendants conveying same.	Experts (Including Retention)
5/31/2024	Mark Johnson	0.8	\$1,150	\$920	review mtn for sanctions and supporting declarations	Other Motions
5/31/2024	Mark Johnson	0.2	\$1,150	\$230	calls w/ GBW re D sanctions mtn and supporting declaration falsehoods	Other Motions
5/31/2024	Rachel Steyer	0.7	\$750	\$525	zoom with RBGG co-counsel, BSU, MTJ, GBW, TCC, JUB to review and discuss tasks and assignments	Case Organization, Planning and Strategy
5/31/2024	Rachel Steyer	2.0	\$750	\$1,500	reviewing production for docs re access g\fixes	Discovery (Non-Deposition)
5/31/2024	Rachel Steyer	0.8	\$750	\$600	reviewing access expert reports and updating Hemet and Fountaingrove comparison charts	Experts (Including Retention)
5/31/2024	Rachel Steyer	1.0	\$750	\$750	reviewing defendants' motion for sanctions	Other Motions
5/31/2024	Rachel Steyer	0.6	\$750	\$450	reviewing docs for proof of name plaintiff unit numbers	Other Motions
5/31/2024	Rachel Steyer	1.1	\$750	\$825	reviewing and editing draft reply brief	Other Motions
5/31/2024	Rachel Steyer	0.2	\$750	\$150	reviewing BBK proposed edits to reply motion	Other Motions
5/31/2024	Rachel Steyer	0.2	\$750	\$150	reviewing draft Bernie Jestrabek-Hart motion ISO reply brief	Other Motions
5/31/2024	Travis Close	0.8	\$850	\$680	Meeting with MTJ, GBW, RLS, co-counsel re: status of reply brief and declarations, defendants' motion for sanctions	Case Organization, Planning and Strategy
5/31/2024	Travis Close	0.8	\$850	\$680	Review and analyze defendants' motion for sanctions and accompanying exhibits	Case Organization, Planning and Strategy
5/31/2024	Travis Close	1.3	\$850	\$1,105	Analyze false statements contained throughout defendants' motion for sanctions and accompanying declarations & create chart of responses for each	Case Organization, Planning and Strategy
5/31/2024	Travis Close	1.4	\$850	\$1,190	Legal research re: claim for invasion of privacy for photographs secretly taken of June Kailes at Scotts Valley visit	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
5/31/2024	Travis Close	1.5	\$850	\$1,275	Legal research re: claim for intentional interference with business relations for false statements attributed to conduct of Ms. Kailes at Scotts Valley & San Ramon facilities	Case Organization, Planning and Strategy
5/31/2024	Travis Close	1.6	\$850	\$1,360	Research professional rules of conduct regarding false statements in sworn declarations & interference with attorney-client relationship	Case Organization, Planning and Strategy
5/31/2024	Travis Close	0.8	\$850	\$680	Analysis of units inspected by Anderson vs. plaintiffs' access experts for Tracy, Scotts Valley, San Ramon, and Brookhurst facilities	Case Organization, Planning and Strategy
6/1/2024	Guy Wallace	4.2	\$1,350	\$5,670	revise and edit draft reply brief re motion to certify subclasses	Class Certification
6/1/2024	Guy Wallace	2.2	\$1,350	\$2,970	revise and edit draft reply brief; preparation of introduction	Class Certification
6/1/2024	Guy Wallace	1.4	\$1,350	\$1,890	review and analysis of Anderson declaration and exhibits thereto; com's with Waters; Mastin; MTJ re same	Class Certification
6/1/2024	Jennifer Bybee	0.3	\$925	\$278	Review emails between co-counsel regarding Reply brief and supporting documentation	Class Certification
6/1/2024	Jennifer Bybee	1.2	\$925	\$1,110	Create redline draft of Reply brief	Class Certification
6/1/2024	Mark Johnson	0.5	\$1,150	\$575	Call w/ GBW re Anderson declaration, Exhibit 2 photographs, arguments that might be made by Defendants re individual resident preferences.	Class Certification
6/1/2024	Mark Johnson	1.3	\$1,150	\$1,495	continue adding to, revising draft Waters Declaration	Class Certification
6/1/2024	Mark Johnson	4.8	\$1,150	\$5,520	continue adding to and revising Waters declaration, com w/ Waters, Wallace and Mastin re same (.1)	Class Certification
6/1/2024	Mark Johnson	1.6	\$1,150	\$1,840	draft detailed memo recalling events of site visit to San Ramon on 5/28	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/2/2024	Guy Wallace	1.8	\$1,350	\$2,430	revise and edit draft reply brief re motion to certify subclasses; review and analysis of draft Waters reply declaration	Class Certification
6/2/2024	Guy Wallace	1.2	\$1,350	\$1,620	review and analysis of further draft of reply brief re motion to certify subclasses; com's with JY; MTJ; JAU re same	Class Certification
6/2/2024	Guy Wallace	3.9	\$1,350	\$5,265	revise and edit draft reply declaration of Waters; com's with Waters; Mastin; MTJ re same	Experts (Including Retention)
6/2/2024	Jennifer Bybee	0.1	\$925	\$93	Review emails with co-counsel re reply brief draft	Class Certification
6/2/2024	Jennifer Bybee	3.3	\$925	\$3,053	Cite check legal and record citations in reply brief	Class Certification
6/2/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re MTJ edits to draft reply	Class Certification
6/2/2024	Mark Johnson	0.9	\$1,150	\$1,035	video conference w/ G Waters, J Mastin, GBW re issues related to expert declarations on reply iso mtn for certification of subclasses	Class Certification
6/2/2024	Mark Johnson	0.5	\$1,150	\$575	Call w/ GBW re revisions to Waters declaration and points to be made in reply brief iso certification of subclasses.	Class Certification
6/2/2024	Mark Johnson	1.6	\$1,150	\$1,840	review and edit reply brief iso subclass certification.	Class Certification
6/2/2024	Mark Johnson	2.3	\$1,150	\$2,645	work on Mastin reply declaration iso certification of subclasses	Class Certification
6/2/2024	Mark Johnson	0.3	\$1,150	\$345	review revisions to Waters reply declaration iso certification of subclasses; coms w/ G Waters re docs	Class Certification
6/2/2024	Mark Johnson	1.7	\$1,150	\$1,955	work on Mastin reply declaration iso certification of subclasses.	Class Certification
6/2/2024	Rachel Steyer	1.1	\$750	\$825	ongoing review of production to attempt to identify docs documenting residents paying for access fixes	Discovery (Non-Deposition)
6/3/2024	Guy Wallace	4.2	\$1,350	\$5,670	revise and edit draft reply brief re motion to certify subclasses; incorporate edits from MTJ	Class Certification
6/3/2024	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of Plaintiffs' opening brief re motion to certify subclasses	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/3/2024	Guy Wallace	2.1	\$1,350	\$2,835	revise and edit draft reply brief re motion to certify subclasses; incorporate RBGG edits; com's with MTJ; JAU; RLS re same	Class Certification
6/3/2024	Guy Wallace	0.9	\$1,350	\$1,215	com's with JY; BBK; BU; MTJ; JAU; TCC; RLS re preparation of reply papers re motion to certify subclasses	Class Certification
6/3/2024	Guy Wallace	1.2	\$1,350	\$1,620	com's with Waters; Mastin; MTJ; TCC re draft reply declarations and revisions to same	Experts (Including Retention)
6/3/2024	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re status of reply brief	Class Certification
6/3/2024	Jennifer Bybee	0.5	\$925	\$463	Incorporate edits to legal citations into draft reply brief	Class Certification
6/3/2024	Jennifer Bybee	0.4	\$925	\$370	Team Zoom meeting re reply brief	Class Certification
6/3/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re analogies for ADA cases	Class Certification
6/3/2024	Jennifer Bybee	0.1	\$925	\$93	Review insert re numerosity / Dr. Flores and email GBW re same	Class Certification
6/3/2024	Mark Johnson	0.2	\$1,150	\$230	Review chart from Steyer, Close comparing units inspected v. units identified by Anderson; coms re same.	Class Certification
6/3/2024	Mark Johnson	1.1	\$1,150	\$1,265	review and revise draft Waters reply dec iso of subclass certification based on Wallace edits, com w/ Waters (.1) re same.	Class Certification
6/3/2024	Mark Johnson	0.4	\$1,150	\$460	team mtg re status of reply brief on subclass mtn, supporting papers	Class Certification
6/3/2024	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW re Waters declaration, Anderson claim that experts declined to inspect certain facilities; further revisions to brief.	Class Certification
6/3/2024	Mark Johnson	0.3	\$1,150	\$345	review revised chart from Steyer identifying units inspected compared to Anderson units; draft email to COC re same	Class Certification
6/3/2024	Mark Johnson	0.8	\$1,150	\$920	team call with Mastin, Waters, Close, Wallace re declarations iso mtn for cerification of subclasses	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/3/2024	Mark Johnson	1.1	\$1,150	\$1,265	calls w/ GBW re Waters and Mastin declarations and proposed revisions to reply brief iso certification of subclasses, issues still to be addressed., D notice of correction re subsidiaries.	Class Certification
6/3/2024	Mark Johnson	0.2	\$1,150	\$230	review D filing re correction of brief re Brookdale affiliated landlords.	Class Certification
6/3/2024	Mark Johnson	6.0	\$1,150	\$6,900	work on Mastin reply declaration iso mtn to certify subclasses.	Class Certification
6/3/2024	Mark Johnson	0.5	\$1,150	\$575	review leases of 6 facilities and provide citations to same for reply brief iso certification of subclasses.	Class Certification
6/3/2024	Mark Johnson	0.2	\$1,150	\$230	com w/ GBW, Waters, Mastin, Bonner re notes and photos produced in connection with Anderson depo.	Class Certification
6/3/2024	Rachel Steyer	0.4	\$750	\$300	zoom with RBGG co-counsel, BSU, JUB, GBW, MTJ, TCC re outstanding items finalizing reply brief	Case Organization, Planning and Strategy
6/3/2024	Rachel Steyer	5.4	\$750	\$4,050	reviewing production for docs re residents paying for access fixes	Discovery (Non-Deposition)
6/3/2024	Rachel Steyer	1.6	\$750	\$1,200	editing/proofreading reply brief	Other Motions
6/3/2024	Travis Close	1.6	\$850	\$1,360	Updates to analysis of Mastin, Waters v. Anseron inspected units (add 2019 inspection dates & distinguish between, which years each unit was inspected)	Case Organization, Planning and Strategy
6/3/2024	Travis Close	0.3	\$850	\$255	Email to MTJ re: revised analysis of access expert v. Anderson inspections	Case Organization, Planning and Strategy
6/3/2024	Travis Close	0.5	\$850	\$425	Meeting with GBW, MTJ, RLS, and co-counsel re: final edits to reply brief iso certification of subclasses,	Case Organization, Planning and Strategy
6/3/2024	Travis Close	2.4	\$850	\$2,040	Draft memo re: san ramon and scotts valley site visits from last week	Case Organization, Planning and Strategy
6/3/2024	Travis Close	0.5	\$850	\$425	Analysis of residency agreement language to determine whether basic services covers one-on-one care	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/3/2024	Travis Close	0.8	\$850	\$680	Review and analyze documents showing that one-one-one care is not provided by Brookdale and that dressing only happens twice per day	Case Organization, Planning and Strategy
6/3/2024	Travis Close	0.7	\$850	\$595	Reconciliation of changes to paragraphs 44-49 of Waters declaration & further edits; send to team for review	Case Organization, Planning and Strategy
6/3/2024	Travis Close	2.1	\$850	\$1,785	Revisions/additions to Waters declaration iso Plaintiffs' reply for certification of subclasses	Class Certification
6/3/2024	Travis Close	0.8	\$850	\$680	Meeting with GBW, MTJ, gary waters and jeff mastin re: finalizing their declarations in support of reply brief for certification of subclasses	Class Certification
6/4/2024	Guy Wallace	2.8	\$1,350	\$3,780	revise and edit reply brief re certification of subclasses; com with JAU re same (.1)	Class Certification
6/4/2024	Guy Wallace	2.9	\$1,350	\$3,915	revise and edit reply declaration of Mastin; com's with Mastin; MTJ re same (.8)	Class Certification
6/4/2024	Guy Wallace	2.1	\$1,350	\$2,835	preparation and drafting of draft reply declaration of Waters re motion to certify subclasses	Experts (Including Retention)
6/4/2024	Guy Wallace	4.6	\$1,350	\$6,210	revise and edit reply declaration of Waters re motion for subclasses	Experts (Including Retention)
6/4/2024	Guy Wallace	0.8	\$1,350	\$1,080	com's with Mastin; MTJ; JAU re final edits to Mastin reply declaration re motion to certify subclasses	Experts (Including Retention)
6/4/2024	Jennifer Bybee	1.1	\$925	\$1,018	Proofread draft of reply brief and insert legal citation check	Class Certification
6/4/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re reply brief status	Class Certification
6/4/2024	Jennifer Bybee	0.2	\$925	\$185	Com's with MTJ re exhibits to Waters and Mastin declarations	Class Certification
6/4/2024	Jennifer Bybee	0.6	\$925	\$555	Teams call with J. Mastin and G. Waters re reply brief declarations	Class Certification
6/4/2024	Jennifer Bybee	0.7	\$925	\$648	Draft paragraphs re common barriers for J. Mastin declaration	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/4/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with co-counsel re expert declarations	Class Certification
6/4/2024	Jennifer Bybee	0.2	\$925	\$185	Update paragraph re common barriers for different subgroups	Class Certification
6/4/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re draft brief status and sending to co-counsel	Class Certification
6/4/2024	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re plan for finalizing brief	Class Certification
6/4/2024	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re Waters Decl.	Class Certification
6/4/2024	Jennifer Bybee	2.3	\$925	\$2,128	Proofread and assemble exhibits to Waters Decl.	Class Certification
6/4/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with MTJ re declaration status	Class Certification
6/4/2024	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re reviewing Waters declaration edits	Class Certification
6/4/2024	Jennifer Bybee	0.5	\$925	\$463	Com's with GBW, MTJ and G. Mastin re Mastin REply Decl.	Class Certification
6/4/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re Waters and Mastin Declarations	Class Certification
6/4/2024	Jennifer Bybee	2.3	\$925	\$2,128	Proofread Mastin Reply Decl. iso Mtn. re Subclasses	Class Certification
6/4/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with MTJ re exhibits to Mastin Decl.	Class Certification
6/4/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re status of Mastin proofread	Class Certification
6/4/2024	Mark Johnson	0.6	\$1,150	\$690	zoom call w/ Waters, Mastin, Bybee, Close, Wallace re expert declarations for class cert of subclasses motion.	Class Certification
6/4/2024	Mark Johnson	0.1	\$1,150	\$115	email cocounsel re status of Mastin declaration, iso subclass certification mtn, next steps and tasks	Class Certification
6/4/2024	Mark Johnson	0.4	\$1,150	\$460	review and analyze chart comparing Anderson-inspected rooms with P expert inspected rooms, coms w/ RLS re omissions, review corrected version; coms w/ experts and COC re same.	Class Certification
6/4/2024	Mark Johnson	0.3	\$1,150	\$345	coms/ w/ COC and experts re Anderson allegation that experts declined to inspect some units made available, review responses and notes of AX covered inspections for same.	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/4/2024	Mark Johnson	0.2	\$1,150	\$230	call w/ JAU re Mastin and Waters reports as Exhibits to declarations iso class certification	Class Certification
6/4/2024	Mark Johnson	0.8	\$1,150	\$920	calls w/ GBW re Mastin, Waters declarations, additions and revisions to same, exhibits, status	Class Certification
6/4/2024	Mark Johnson	0.1	\$1,150	\$115	call w/ B Bien Kahn re expert declarations	Class Certification
6/4/2024	Mark Johnson	0.7	\$1,150	\$805	coms w/ RLS, BBK re two fountangrove unit 201's listed in Anderson Exhibit 2 to subclass cert opposition brief; review D production of Anderson photos to match photos and determine correct room	Class Certification
6/4/2024	Mark Johnson	0.6	\$1,150	\$690	video conference w/ Mastin, Wallace, Close re reply declaration iso certification of subclasses	Class Certification
6/4/2024	Mark Johnson	0.5	\$1,150	\$575	video call w/ Mastin, Wallace, JAU, Close re reply declaration iso subclass certification.	Class Certification
6/4/2024	Mark Johnson	0.7	\$1,150	\$805	review and further edits to Waters declaration, draft paragraph re Anderson statement that declined to inspect units	Class Certification
6/4/2024	Mark Johnson	1.0	\$1,150	\$1,150	insert citations to subclass cert reply brief for Waters / Mastin declaration cites; coms w/ A Speigal, BBK re same	Class Certification
6/4/2024	Mark Johnson	0.3	\$1,150	\$345	coms w/ J Mastin re exhibits to reply declaration; coms w/ J Bybee re same	Class Certification
6/4/2024	Mark Johnson	4.5	\$1,150	\$5,175	further revision and addition to Mastin reply declaration is certification of subclasses.	Class Certification
6/4/2024	Mark Johnson	0.2	\$1,150	\$230	coms w/ RAB re failure of D production to load, manually loading and saving, passcode transmission	Discovery (Non-Deposition)
6/4/2024	Rachel Steyer	4.2	\$750	\$3,150	ongoing review of production for resident access fixes docs	Discovery (Non-Deposition)
6/4/2024	Rachel Steyer	0.2	\$750	\$150	call with GBW to review extent of discovery available re residents paying for access fixes	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/4/2024	Rachel Steyer	0.2	\$750	\$150	revising chart tracking residential units inspected by access experts	Experts (Including Retention)
6/4/2024	Rachel Steyer	0.9	\$750	\$675	proofreading Mastin reply declaration	Experts (Including Retention)
6/4/2024	Rachel Steyer	0.2	\$750	\$150	reviewing JUB draft inserts to Mastin reply declaration	Experts (Including Retention)
6/4/2024	Rachel Steyer	0.2	\$750	\$150	reviewing updated Mastin reply declaration	Experts (Including Retention)
6/4/2024	Rachel Steyer	0.5	\$750	\$375	reviewing/proofing final reply brief	Other Motions
6/4/2024	Rachel Steyer	0.2	\$750	\$150	reviewing defendants' response/reply re clarification motion of subclass definition	Other Motions
6/4/2024	Travis Close	0.4	\$850	\$340	Review and analyze edits by Waters to Waters declaration, inserts for paragraphs 44-46, lists of photos for paragraphs 48-49	Case Organization, Planning and Strategy
6/4/2024	Travis Close	0.8	\$850	\$680	Review, analyze, and propose revisions for draft declaration of jeff mastin iso reply supporting subclasses certification	Case Organization, Planning and Strategy
6/4/2024	Travis Close	0.2	\$850	\$170	Email to gary waters re: additional photos showing low toilets from Anderson brief	Case Organization, Planning and Strategy
6/4/2024	Travis Close	0.4	\$850	\$340	Call with GBW, MTJ, and access experts re: further edits to Mastin & Waters declarations supporting reply brief	Case Organization, Planning and Strategy
6/4/2024	Travis Close	0.4	\$850	\$340	Legal research re: CA H&SC 19952.5 & send findings to access experts	Case Organization, Planning and Strategy
6/4/2024	Travis Close	2.1	\$850	\$1,785	Review and analyze defendants' motion for sanctions; create outline of opposition to motion for sanctions	Case Organization, Planning and Strategy
6/4/2024	Travis Close	1.6	\$850	\$1,360	Begin drafting declaration of TCC iso opposition to motion for sanctions	Case Organization, Planning and Strategy
6/4/2024	Travis Close	0.6	\$850	\$510	Meet with MTJ, GBW, and jeff mastin re: final edits to Mastin declaration iso reply supporting certification of subclasses	Case Organization, Planning and Strategy
6/4/2024	Travis Close	0.8	\$850	\$680	Review, analyze, propose revisions for latest draft of Reply MPA iso certification of subclasses	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/4/2024	Travis Close	0.8	\$850	\$680	Call with June Kailes re: responding to defendants' motion for sanctions	Experts (Including Retention)
6/5/2024	Guy Wallace	1.7	\$1,350	\$2,295	preparation of initial notes re hearing on motion to certify subclasses	Class Certification
6/5/2024	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ; RLS re Defendants' approach and responses to residents and potential residents re requests for access fixes	Misc. Research
6/5/2024	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ; TCC re Defendants' second motion for sanctions	Other Motions
6/5/2024	Guy Wallace	1.1	\$1,350	\$1,485	legal research and analysis re contention interrogatories and sufficient responses re same; com's with MTJ re response to ER re insufficiency of Defendants' proposal re same	Other Motions
6/5/2024	Mark Johnson	0.4	\$1,150	\$460	Call w/ GBW re subclass certification mtn, analysis of recent document production by Ds, rog responses re current EDs, strategy on rogs re access barrier disputes, outreach to former EDs	Case Organization, Planning and Strategy
6/5/2024	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re access rogs, expert depos	Case Organization, Planning and Strategy
6/5/2024	Mark Johnson	0.1	\$1,150	\$115	email COC re supp responses to Carlson rogs re EDs and tenure and Bertino email, outreach to former EDs	Discovery (Non-Deposition)
6/5/2024	Mark Johnson	0.3	\$1,150	\$345	draft email to E Rutner responding to email re access barrier contention rogs; com w/ GBW re same.	Discovery (Non-Deposition)
6/5/2024	Mark Johnson	0.3	\$1,150	\$345	review D reply iso mtn to clarify transportation subclass definition	Other Motions
6/5/2024	Mark Johnson	0.5	\$1,150	\$575	call w/ T Close re opposition to sanctions motion and reply iso mtn to reconsider order on Omole / Rubin depos	Other Motions
6/5/2024	Mark Johnson	0.6	\$1,150	\$690	gather docs and past pleadings for reply iso mtn for reconsideration re deposition.	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/5/2024	Mark Johnson	0.4	\$1,150	\$460	review and respond to OC Bertino re docs to be filed under seal with opp to mtn for clarification; reveiw same; com w/ GBW re same and re sanctions mtn (.2)	Other Motions
6/5/2024	Mark Johnson	0.6	\$1,150	\$690	Review D opposition to mtn for reconsideration of depos	Other Motions
6/5/2024	Mark Johnson	0.3	\$1,150	\$345	coms w/ OC Bertino re mtn to file under seal for opp to mtn for reconsideration, review stip, com w/ GBW re same	Other Motions
6/5/2024	Mark Johnson	0.3	\$1,150	\$345	draft bullet points for TCC re D opp to mtn for reconsideration and responses to same.	Other Motions
6/5/2024	Rachel Steyer	0.2	\$750	\$150	spoke with daughter of current resident, agreed to pass contact info to her sister for further info	Class Outreach and Contact
6/5/2024	Rachel Steyer	0.3	\$750	\$225	call with daughter of current residents, discussed case, not many access barriers	Class Outreach and Contact
6/5/2024	Rachel Steyer	2.8	\$750	\$2,100	reviewing production for documents of residents paying for access fixes	Discovery (Non-Deposition)
6/5/2024	Rachel Steyer	1.5	\$750	\$1,125	reviewing latest productions, updating master index spreadsheet	Discovery (Non-Deposition)
6/5/2024	Rachel Steyer	0.2	\$750	\$150	draft email to MTJ, GBW, RAB re draft email to OC re bates stamp errors	Discovery (Non-Deposition)
6/5/2024	Rachel Steyer	0.2	\$750	\$150	reviewing draft TCC declaration ISO plaintiffs' opposition to sanctions motion	Other Motions
6/5/2024	Rachel Steyer	0.3	\$750	\$225	reviewing defendants' response/opposition to motion for reconsideration	Other Motions
6/5/2024	Travis Close	1.7	\$850	\$1,445	Continue drafting TCC declaration supporting opposition to motion for sanctions, with emphasis on correcting false statements made by Brookdale's witnesses	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/5/2024	Travis Close	0.6	\$850	\$510	Call with MTJ re: responding to defendants' anticipated response re: motion for reconsideration to Judge Beeler	Case Organization, Planning and Strategy
6/5/2024	Travis Close	0.3	\$850	\$255	Legal research re: conditions required for proper inspection under FRCP Rule 34	Case Organization, Planning and Strategy
6/5/2024	Travis Close	1.3	\$850	\$1,105	Review and analyze final reply brief iso class certification & supporting exhibits (as filed) for potential errata	Class Certification
6/5/2024	Travis Close	1.8	\$850	\$1,530	Review and analyze background filings, including prior court orders, parties' joint letter briefs, and other motions, in prep for reply to defendants' expected response re: motion for reconsideration later today	Discovery (Non-Deposition)
6/5/2024	Travis Close	0.2	\$850	\$170	Email to June Kailes re: schedule for responding to motion for sanctions	Experts (Including Retention)
6/5/2024	Travis Close	2.3	\$850	\$1,955	Continue drafting declaration of TCC supporting opposition to motion for sanctions	Other Motions
6/6/2024	Guy Wallace	1.3	\$1,350	\$1,755	review and analysis of Defendants' opposition to motion for reconsideration re Rubin; Omole depositions; analysis of MTJ notes re same	Other Motions
6/6/2024	Guy Wallace	1.1	\$1,350	\$1,485	com's with MTJ; TCC; RLS re preparation of reply re Defendants' opposition to motion for reconsideration re Rubin and Omole depositions	Other Motions
6/6/2024	Guy Wallace	1.2	\$1,350	\$1,620	legal research and analysis re case law on use of multiple discovery tools re a subject area; boilerplate objections of disproportionality	Other Motions
6/6/2024	Guy Wallace	1.7	\$1,350	\$2,295	revise and edit draft reply re motion for leave to file motion for reconsideration re Rubin and Omole depositions	Other Motions
6/6/2024	Mark Johnson	0.5	\$1,150	\$575	conference call w/ GBW, TCC re outline of reply iso mtn for reconsideration of Omole and Rubin depositions	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/6/2024	Mark Johnson	0.1	\$1,150	\$115	call w/ GBW re reply iso mtn for reconsideration of Omole and Rubin depositions.	Other Motions
6/6/2024	Mark Johnson	0.7	\$1,150	\$805	review TCC draft of reply iso mtn for reconsideration of Omole, Rubin depo; review revised, shorter draft from GBW, comment on same.	Other Motions
6/6/2024	Rachel Steyer	5.1	\$750	\$3,825	reviewing and updating index	Discovery (Non-Deposition)
6/6/2024	Rachel Steyer	0.2	\$750	\$150	call with TCC to review tasks to prepare reply to motion for reconsideration	Other Motions
6/6/2024	Rachel Steyer	1.2	\$750	\$900	researching cites and expert info for response to motion for reconsideration	Other Motions
6/6/2024	Rachel Steyer	0.6	\$750	\$450	editing and reviewing TCC draft reply re motion for reconsideration	Other Motions
6/6/2024	Rachel Steyer	0.2	\$750	\$150	reviewing final proofs of reply motion for reconsideration	Other Motions
6/6/2024	Travis Close	0.4	\$850	\$340	Review and analyze court's class certification order in related case, Bright v. Brookdale	Case Organization, Planning and Strategy
6/6/2024	Travis Close	0.7	\$850	\$595	Call with MTJ, GBW re: substance and main points to address in reply brief in support of motion for reconsideration	Case Organization, Planning and Strategy
6/6/2024	Travis Close	0.2	\$850	\$170	Call with RLS re: assistance with reply in support of motion for reconsideration	Case Organization, Planning and Strategy
6/6/2024	Travis Close	1.5	\$850	\$1,275	Final edits to motion for reconsideration, TCC declaration in support thereof, and attached exhibits	Case Organization, Planning and Strategy
6/6/2024	Travis Close	1.2	\$850	\$1,020	Prepare declaration of TCC in support of reply iso motion for reconsideration	Case Organization, Planning and Strategy
6/6/2024	Travis Close	0.3	\$850	\$255	Email to RLS re: research assignment for reply iso motion for reconsideration	Case Organization, Planning and Strategy
6/6/2024	Travis Close	2.5	\$850	\$2,125	Draft reply in support of motion for reconsideration (Deposition of Kelly Rubin)	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/6/2024	Travis Close	2.3	\$850	\$1,955	Draft reply in support of motion for reconsideration (Deposition of Akindele Omole)	Depositions
6/6/2024	Travis Close	0.7	\$850	\$595	Review and analyze defendants' opposition to motion for reconsideration and supporting exhibits	Discovery (Non-Deposition)
6/7/2024	Guy Wallace	0.5	\$1,350	\$675	analysis of Defendants' motion for sanctions; com's with GG; MTJ re same	Other Motions
6/7/2024	Rachel Steyer	7.7	\$750	\$5,775	further review of production for access fixes/residents paying	Discovery (Non-Deposition)
6/7/2024	Travis Close	0.3	\$850	\$255	Review and analyze reply iso motion for reconsideration (as filed) & exhibits for potential errata	Case Organization, Planning and Strategy
6/7/2024	Travis Close	1.7	\$850	\$1,445	Legal research re: purpose and intent behind FRCP Rule 34 inspections	Case Organization, Planning and Strategy
6/7/2024	Travis Close	1.4	\$850	\$1,190	Legal research re: tenants' rights in senior living facilities to entertain guests	Case Organization, Planning and Strategy
6/7/2024	Travis Close	2.4	\$850	\$2,040	Review and analyze evidence of evacuation chairs in stairwells at San Ramon and Scotts Valley facilities	Case Organization, Planning and Strategy
6/7/2024	Travis Close	0.6	\$850	\$510	Call with June Kailes re: update on strategy for opposition to motion for sanctions	Case Organization, Planning and Strategy
6/8/2024	Guy Wallace	1.5	\$1,350	\$2,025	legal research and analysis re case law re affirmative duty to remove barriers	Misc. Research
6/10/2024	Guy Wallace	2.7	\$1,350	\$3,645	review and analysis of Defendants' motion for sanctions re Kailes visits to San Ramon and Scotts Valley	Other Motions
6/10/2024	Guy Wallace	0.4	\$1,350	\$540	com's with TCC re Defendants' motion for sanctions; role of June Kailes re visits to Brookdale San Ramon and Scotts Valley facilities	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/10/2024	Guy Wallace	3.7	\$1,350	\$4,995	preparation of outline of opposition to Defendants' second motion for sanctions; review and analysis of Residency Agreement; com's with MTJ; JAU; TCC re same (.7)	Other Motions
6/10/2024	Guy Wallace	0.7	\$1,350	\$945	zoom with MTJ; TCC re preparation of opposition to Defendants' motion for sanctions re visits to San Ramon and Scotts Valley facilities	Other Motions
6/10/2024	Guy Wallace	0.5	\$1,350	\$675	com's with GG re preparation of opposition to Defendants' second motion for sanctions	Other Motions
6/10/2024	Guy Wallace	1.2	\$1,350	\$1,620	revise and edit draft declaration of Kailes in opposition to Defendants' motion for sanctions; com's with MTJ re same & opposition to Defendants' motion	Other Motions
6/10/2024	Jennifer Bybee	1.6	\$925	\$1,480	Research re depositions and document production may occur simultaneously	Discovery (Non-Deposition)
6/10/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re response to Mtn for Sanctions	Other Motions
6/10/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re outline to response to motion re sanctions	Other Motions
6/10/2024	Jennifer Bybee	0.2	\$925	\$185	Review outline of response to motion for sanctions	Other Motions
6/10/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re my sections of response to motion for sanctions	Other Motions
6/10/2024	Mark Johnson	0.3	\$1,150	\$345	coms w/ RLS, RAB re issues with bates numbering of Ds production; proposed email re same, review response from Ds and follow up coms w RAB, RLS	Discovery (Non-Deposition)
6/10/2024	Mark Johnson	0.3	\$1,150	\$345	Call w/ GBW re arguments on sanctions mtn, Rule 34 requirements, declarations in opp to mtn	Other Motions
6/10/2024	Mark Johnson	1.1	\$1,150	\$1,265	follow up calls w/ GBW re strategy for responding to mtns for sanctions, outline for brief, assignments, case law re Rule 34 inspections, facts related to 5/29 visit.	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/10/2024	Mark Johnson	0.3	\$1,150	\$345	review and edit/comment on draft declaration from TCC in opposition to sanctions mtg.	Other Motions
6/10/2024	Mark Johnson	0.5	\$1,150	\$575	call from GBW re sanctions mtg and declarations.	Other Motions
6/10/2024	Mark Johnson	6.3	\$1,150	\$7,245	draft declaration in opposition to mtg for sanctions; review Ds mtg and supporting declarations, email exchange w/ OC and own notes for same.	Other Motions
6/10/2024	Rachel Steyer	1.1	\$750	\$825	attempted class outreach, leaving VMs, updating notes in spreadsheet	Class Outreach and Contact
6/10/2024	Rachel Steyer	0.4	\$750	\$300	call with niece of current resident, discussed case, scheduled intake	Class Outreach and Contact
6/10/2024	Rachel Steyer	0.4	\$750	\$300	received call back from daughter of residents, discussed case, scheduled intake	Class Outreach and Contact
6/10/2024	Rachel Steyer	0.4	\$750	\$300	call back with son of former resident, discussed case, answered questions	Class Outreach and Contact
6/10/2024	Rachel Steyer	2.5	\$750	\$1,875	ongoing review and updating of master discovery index	Discovery (Non-Deposition)
6/10/2024	Rachel Steyer	0.4	\$750	\$300	reviewing/editing MTJ declaration ISO opposition to motion for sanctions	Other Motions
6/10/2024	Rachel Steyer	0.5	\$750	\$375	reviewing supporting declarations ISO plaintiffs' opposition to motion for sanctions	Other Motions
6/10/2024	Travis Close	0.7	\$850	\$595	Call with GBW re: discussing strategy for sanctions motion	Case Organization, Planning and Strategy
6/10/2024	Travis Close	0.7	\$850	\$595	Review and analyze June Kailes' depo transcript for statements related to her expertise in accessibility work	Case Organization, Planning and Strategy
6/10/2024	Travis Close	0.5	\$850	\$425	Meet with MTJ, GBW re: responding to motion for sanctions	Case Organization, Planning and Strategy
6/10/2024	Travis Close	0.2	\$850	\$170	Email to JIK re: request for notes from San Ramon and Scotts Valley site visits	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/10/2024	Travis Close	2.6	\$850	\$2,210	Draft declaration of june kailes iso opposition to motion for sanctions	Case Organization, Planning and Strategy
6/10/2024	Travis Close	1.8	\$850	\$1,530	Draft declaration of Bernie Jestrabek-Hart iso opposition to motion for sanctions	Case Organization, Planning and Strategy
6/10/2024	Travis Close	1.3	\$850	\$1,105	Edits to declaration of TCC iso plaintiffs' opposition to motion for sanctions	Case Organization, Planning and Strategy
6/10/2024	Travis Close	0.4	\$850	\$340	Email to AS (co-counsel) re: coordinating with BJH to finalize declaration supporting opposition to sanctions	Case Organization, Planning and Strategy
6/11/2024	Guy Wallace	2.8	\$1,350	\$3,780	review and analysis of Defendants' second motion for sanctions; revise and edit draft declarations of Kailes; Jestrabek-Hart; MTJ re same	Other Motions
6/11/2024	Guy Wallace	0.5	\$1,350	\$675	com's with BU re Defendants' second motion for sanctions; Personal Rights, RCFE's and case law re same	Other Motions
6/11/2024	Guy Wallace	0.4	\$1,350	\$540	com's with RLS re Brookdale policies and any other documents re "guests"	Other Motions
6/11/2024	Guy Wallace	0.3	\$1,350	\$405	com's with JAU re preparation of section re Defendants' requests for sanctions	Other Motions
6/11/2024	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re revised version of outline of opposition to Defendants' second motion for sanctions	Other Motions
6/11/2024	Guy Wallace	0.4	\$1,350	\$540	com's with TCC re nature and purposes of Kailes visits and follow-up discovery	Other Motions
6/11/2024	Guy Wallace	1.6	\$1,350	\$2,160	preparation of further draft of detailed outline of opposition to Defendants' motion for sanctions; incorporate additional points from MTJ and BU re same	Other Motions
6/11/2024	Guy Wallace	0.9	\$1,350	\$1,215	revise and edit draft declarations of MTJ; BJH; com's with MTJ; TCC re same	Other Motions
6/11/2024	Guy Wallace	0.6	\$1,350	\$810	revise and edit draft declaration of Stacy Stiner in opposition to Defendants' motion for sanctions	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/11/2024	Jennifer Bybee	3.1	\$925	\$2,868	Review cases and materials cited in Defendants' Mtn for Sanctions and take notes re same	Other Motions
6/11/2024	Jennifer Bybee	0.4	\$925	\$370	Research standard in 9th Circuit for attorney disqualification	Other Motions
6/11/2024	Jennifer Bybee	1.9	\$925	\$1,758	Draft Sanctions are not warranted portion of opposition to motion for sanctions	Other Motions
6/11/2024	Mark Johnson	0.1	\$1,150	\$115	Review emails from GBW re rule and arguments related to D sanctions mtn	Other Motions
6/11/2024	Mark Johnson	0.2	\$1,150	\$230	call w/ client S Stiner re declaration in opposition to mtn for sanctions.	Other Motions
6/11/2024	Mark Johnson	0.5	\$1,150	\$575	Calls (x3) w/ GBW re analysis of Ds arguments on motion for sanctions, guest not being limited to purely social visits, timing of expert inspections and relationship to discovery deadlines.	Other Motions
6/11/2024	Mark Johnson	0.9	\$1,150	\$1,035	review proposed edits to draft MTJ declaration iso opposition to motion for sanctions; make further revisions to declarations.	Other Motions
6/11/2024	Mark Johnson	0.7	\$1,150	\$805	review and revise draft outline of opposition to mtn for sanctions.	Other Motions
6/11/2024	Mark Johnson	1.7	\$1,150	\$1,955	research cases on disqualification and application of L.R. 11-4	Other Motions
6/11/2024	Mark Johnson	0.1	\$1,150	\$115	call w/ GBW re additions to outline on opposition to sanctions mtn, case law on disqualification, failure to meet and confer.	Other Motions
6/11/2024	Mark Johnson	1.4	\$1,150	\$1,610	legal research - review of Ninth Circuit cases on standards for disqualification of counsel.	Other Motions
6/11/2024	Mark Johnson	1.7	\$1,150	\$1,955	review notes from call w/ client and draft declaration iso opposition to mtn for sanctions.	Other Motions
6/11/2024	Mark Johnson	1.2	\$1,150	\$1,380	work on fact section of brief in opposition to sanctions mtn.	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/11/2024	Rachel Steyer	1.5	\$750	\$1,125	reviewing production for documents re guest policy	Discovery (Non-Deposition)
6/11/2024	Rachel Steyer	2.0	\$750	\$1,500	ongoing review of and updating discovery index	Discovery (Non-Deposition)
6/11/2024	Rachel Steyer	1.0	\$750	\$750	legal research re opposition to sanctions motion	Other Motions
6/11/2024	Rachel Steyer	0.3	\$750	\$225	proofreading revised MTJ declaration ISO plts opposition to sanctions	Other Motions
6/11/2024	Rachel Steyer	0.2	\$750	\$150	reviewing Jacobsen declaration ISO admin motion to seal	Other Motions
6/11/2024	Rachel Steyer	1.0	\$750	\$750	research into RCFE statute re residents rights for opposition to sanctions motion	Other Motions
6/11/2024	Rachel Steyer	0.2	\$750	\$150	reviewing draft Stiner declaration ISO opposition to sanctions motion	Other Motions
6/11/2024	Travis Close	0.4	\$850	\$340	Analyze time of production for latest emergency evacuation plans for San Ramon and Scotts Valley facilities	Case Organization, Planning and Strategy
6/11/2024	Travis Close	0.2	\$850	\$170	Email to RAB re: question about dates of production for emergency evacuation plans	Case Organization, Planning and Strategy
6/11/2024	Travis Close	0.2	\$850	\$170	Email to AS (co-counsel) re: scheduling time to speak with BJH re: declaration supporting opposition to sanctions	Case Organization, Planning and Strategy
6/11/2024	Travis Close	0.6	\$850	\$510	Call with Bernie Jestrabek-Hart re: accounts of May 29 site visit	Case Organization, Planning and Strategy
6/11/2024	Travis Close	0.4	\$850	\$340	Legal research re: personal rights of residents in facilities for the elderly	Case Organization, Planning and Strategy
6/11/2024	Travis Close	0.4	\$850	\$340	Edits to draft declaration of Bernie Jestrabek-Hart iso opposition to motion for sanctions	Case Organization, Planning and Strategy
6/11/2024	Travis Close	0.4	\$850	\$340	Prepare for call with bernie jestrabek-hart later this afternoon (review notes and draft interview questions)	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/11/2024	Travis Close	2.3	\$850	\$1,955	Draft MPA for motion for sanctions - section III (relevant procedural and factual background)	Other Motions
6/11/2024	Travis Close	2.2	\$850	\$1,870	Draft MPA for motion for sanctions - section IV.A (argument - did not violate court orders & Kailes not physical accessibility expert)	Other Motions
6/12/2024	Guy Wallace	1.0	\$1,350	\$1,350	review and analysis of draft declaration of TCC in opposition to Defendants' motion for sanctions; revise and edit same	Other Motions
6/12/2024	Guy Wallace	2.4	\$1,350	\$3,240	preparation and drafting of section re Rule 34 for opposition to Defendants' second motion for sanctions	Other Motions
6/12/2024	Guy Wallace	4.4	\$1,350	\$5,940	preparation and drafting of sections of opposition brief re Defendants' second motion for sanctions re Rule 34 inspections; Defendants' requested remedies	Other Motions
6/12/2024	Guy Wallace	0.9	\$1,350	\$1,215	com's with MTJ; JAU; TCC re opposition to Defendants' second motion for sanctions	Other Motions
6/12/2024	Jennifer Bybee	1.2	\$925	\$1,110	Draft section re employee declarations should be afforded little weight.	Other Motions
6/12/2024	Jennifer Bybee	0.1	\$925	\$93	Review email com's with GBW, MTJ, TCC and RLS re opp to motion for sanctions and supporting documentation	Other Motions
6/12/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re additional research for opp. to motion for sanctions	Other Motions
6/12/2024	Jennifer Bybee	1.4	\$925	\$1,295	Research re Rule 34 is permissive / doesn't apply	Other Motions
6/12/2024	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re strength of opposition motion	Other Motions
6/12/2024	Jennifer Bybee	0.1	\$925	\$93	Review com's with GBW, TCC re opposition to motion for sanctions	Other Motions
6/12/2024	Mark Johnson	0.7	\$1,150	\$805	preliminary review Ds supplemental responses to 8 sets of Plaintiff interrogatories.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/12/2024	Mark Johnson	0.2	\$1,150	\$230	coms w/ RAB, RLS re document production issues, review proposed email re same and response from OC	Discovery (Non-Deposition)
6/12/2024	Mark Johnson	0.5	\$1,150	\$575	call w/ GBW re Close and Stiner declarations, recounting events of 5/29 for opposition to sanctions mtn	Other Motions
6/12/2024	Mark Johnson	2.2	\$1,150	\$2,530	Work on section of opp to sanctions motion re hearsay and credibility of declarations.	Other Motions
6/12/2024	Mark Johnson	0.2	\$1,150	\$230	call w/ T Close re circumstances leading to decision to visit common areas / stairwells at San Ramon	Other Motions
6/12/2024	Mark Johnson	0.6	\$1,150	\$690	call w/ GBW re circumstances leading to decision for Kailes to visit SR and SV, purpose of same	Other Motions
6/12/2024	Mark Johnson	0.5	\$1,150	\$575	calls w/ GBW re brief in opposition to mtn for sanctions, declarations iso of same, integrating sections of brief,	Other Motions
6/12/2024	Mark Johnson	0.8	\$1,150	\$920	review draft sections of brief from TCC, GBW	Other Motions
6/12/2024	Mark Johnson	1.0	\$1,150	\$1,150	work on integration of pieces of brief into first full draft; revisions to same; coms w/ LEC re formatting.	Other Motions
6/12/2024	Mark Johnson	4.0	\$1,150	\$4,600	work on sections of brief in opposition to sanctions mtn re alleged violation of LR 11-4, compliance with rules and sign in requirement.	Other Motions
6/12/2024	Rachel Steyer	1.0	\$750	\$750	attempting class outreach, leaving VMs, updating notes in spreadsheet	Class Outreach and Contact
6/12/2024	Rachel Steyer	0.2	\$750	\$150	spoke with son of current residnet, set up intake call	Class Outreach and Contact
6/12/2024	Rachel Steyer	0.2	\$750	\$150	spoke with son of current resident, no mobility or vision disabilities/no issues	Class Outreach and Contact
6/12/2024	Rachel Steyer	0.6	\$750	\$450	call with daughter of current resident, discussed case, scheduled intake call	Class Outreach and Contact
6/12/2024	Rachel Steyer	0.6	\$750	\$450	call with daughter of current resident, discussed case, answered questions, scheduled intake call	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/12/2024	Rachel Steyer	0.2	\$750	\$150	call with son of current resident, discussed case, no disabilities/issues	Class Outreach and Contact
6/12/2024	Rachel Steyer	0.2	\$750	\$150	call back with resident Ruby Miller, discussed case, scheduled intake call	Class Outreach and Contact
6/12/2024	Rachel Steyer	1.6	\$750	\$1,200	reviewing production and updating master index	Discovery (Non-Deposition)
6/12/2024	Rachel Steyer	0.7	\$750	\$525	reviewing defendants supplemental ROG responses	Discovery (Non-Deposition)
6/12/2024	Rachel Steyer	0.2	\$750	\$150	reviewing/proofreading section of opposition to sanctions motion	Other Motions
6/12/2024	Rachel Steyer	0.3	\$750	\$225	reviewing and proofreading TCC draft sections	Other Motions
6/12/2024	Rachel Steyer	0.3	\$750	\$225	reviewing/proofreading draft GBW section to opposition to sanctions motion	Other Motions
6/12/2024	Rachel Steyer	0.2	\$750	\$150	reviewing formatting/caption of plaintiffs opposition to sanctions motion	Other Motions
6/12/2024	Rachel Steyer	0.7	\$750	\$525	editing and reviewing full sanctions opposition motion	Other Motions
6/12/2024	Travis Close	2.1	\$850	\$1,785	Finish first draft of assigned sections of opposition to motion for sanctions brief; send to team for review	Case Organization, Planning and Strategy
6/12/2024	Travis Close	1.4	\$850	\$1,190	Legal reaserch re: scope of proper & relevant fact/expert discovery while both remain open	Case Organization, Planning and Strategy
6/12/2024	Travis Close	1.7	\$850	\$1,445	Legal research re: whether sanctions may be warranted for failure to meet and confer before filing a discovery motion	Case Organization, Planning and Strategy
6/12/2024	Travis Close	1.5	\$850	\$1,275	Continue drafting assigned sections of opposition to motion for sanctions (Defedants' motion was brought frivolously, and Defs failed to meet and confer)	Case Organization, Planning and Strategy
6/12/2024	Travis Close	1.2	\$850	\$1,020	Continue drafting assigned sections of opposition to motion for sanctions (Ms. Kailes' visits did not violate the court's order re: inspections)	Case Organization, Planning and Strategy
6/12/2024	Travis Close	0.3	\$850	\$255	Review and analyze early draft of opposition to motion for sanctions	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/13/2024	Guy Wallace	2.9	\$1,350	\$3,915	preparation of further version of initial draft of opposition to Defendants' second motion for sanctions; com's with MTJ; JAU; TCC; RLS re same (.1)	Other Motions
6/13/2024	Guy Wallace	1.8	\$1,350	\$2,430	revise and edit draft of opposition to motion for sanctions; incorporate edits from MTJ; JAU; TCC	Other Motions
6/13/2024	Guy Wallace	1.9	\$1,350	\$2,565	revise and edit draft opposition to Defendants' second motion for sanctions; incorporate RBGG comments and edits	Other Motions
6/13/2024	Guy Wallace	3.7	\$1,350	\$4,995	revise and edit draft opposition to Defendants' second motion for sanctions; revise and edit Declarations of Jestrabek-Hart; Stacy Stiner; MTJ; com's with GG; MTJ; JAU; TCC re same (1.3)	Other Motions
6/13/2024	Guy Wallace	0.6	\$1,350	\$810	review and analysis of further draft of Kailes declaration in opposition to Defendants' motion for sanctions	Other Motions
6/13/2024	Jennifer Bybee	0.2	\$925	\$185	Review com's between MTJ, GBW, TCC, LCC, and RLS re drafts of opposition to motion for sanctions	Other Motions
6/13/2024	Jennifer Bybee	1.6	\$925	\$1,480	Create redline edit of draft of opposition to motion for sanctions	Other Motions
6/13/2024	Mark Johnson	0.2	\$1,150	\$230	draft email response to COC Jim Thornton re strategy and timing of expert depositions	Case Organization, Planning and Strategy
6/13/2024	Mark Johnson	0.8	\$1,150	\$920	draft section of opp to sanctions mtn re prompt departure after being asked to leave, no refusal to leave.	Other Motions
6/13/2024	Mark Johnson	0.1	\$1,150	\$115	call w/ GBW re inclusion of certain language re representations in brief in opp to mtn for sanctions.	Other Motions
6/13/2024	Mark Johnson	0.7	\$1,150	\$805	review GBW revised version of brief in opposition to sanctions mtn, review JAU proposed edits to same.	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/13/2024	Mark Johnson	0.3	\$1,150	\$345	email exchanges w/ GBW, TCC, JAU re brief in opposition to sanctions motion, description of certain facts referenced therein, additional arguments.	Other Motions
6/13/2024	Mark Johnson	1.3	\$1,150	\$1,495	call w/ client S Stiner to review D's sanction motion, Ds declarations and review her own declaration.	Other Motions
6/13/2024	Mark Johnson	0.1	\$1,150	\$115	call w/ GBW re conversation with S Stiner and revisions to declaration	Other Motions
6/13/2024	Mark Johnson	0.3	\$1,150	\$345	compete revisions to Stiner declaration in opposition to sanctions mtn based on call with her; draft cover email with explanations to OC conveying revised draft with redlines.	Other Motions
6/13/2024	Mark Johnson	0.7	\$1,150	\$805	further revisions to Stiner declaration iso opposition to sanctions motion.	Other Motions
6/13/2024	Mark Johnson	0.6	\$1,150	\$690	call w/ T Close re Kailes and Jestrabek Hart declarations, sequence and timing of events at Brookdale SR on 5/29, photographs taken for opp to sanctions mtn	Other Motions
6/13/2024	Mark Johnson	0.3	\$1,150	\$345	coms w/ LEC and BBK re Stiner declaration, use of docu-sign;	Other Motions
6/13/2024	Mark Johnson	0.5	\$1,150	\$575	legal research re use of digital signatures on declarations filed in court; email w/ COC re same.	Other Motions
6/13/2024	Mark Johnson	0.3	\$1,150	\$345	further call w/ client S Stiner re revisions to declaration iso opp to sanctions motion	Other Motions
6/13/2024	Mark Johnson	1.1	\$1,150	\$1,265	calls w/ GBW re brief in opp to mtn for sanctions, declarations, revisions to same	Other Motions
6/13/2024	Mark Johnson	0.8	\$1,150	\$920	review and propose edits to revised draft of Kailes declaration iso opp to sanctions mtn; review next revision and propose additions to same	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/13/2024	Mark Johnson	1.4	\$1,150	\$1,610	review and revise and offer comments on latest draft of brief in opposition to sanctions mtn, begin inserting cites from MJ declaration and make further revisions to declaration.	Other Motions
6/13/2024	Mark Johnson	0.2	\$1,150	\$230	draft emails to D Marks re trial prep plans, research re other litigation against Brookdale entities.	Trial and Pretrial Preparation
6/13/2024	Rachel Steyer	1.2	\$750	\$900	conducted partial intake with niece of current resident	Class Outreach and Contact
6/13/2024	Rachel Steyer	0.3	\$750	\$225	received call back from son of current resident, discussed case and got further contact info	Class Outreach and Contact
6/13/2024	Rachel Steyer	3.3	\$750	\$2,475	reviewing production and updating discovery index	Discovery (Non-Deposition)
6/13/2024	Rachel Steyer	0.2	\$750	\$150	reviewing internal correspondence re finalizing sanctions opposition	Other Motions
6/13/2024	Rachel Steyer	0.6	\$750	\$450	reviewing and editing opposition to sanctions motion	Other Motions
6/13/2024	Rachel Steyer	0.2	\$750	\$150	reviewing and proofreading final Stiner declaration ISO opposition to sanctions motion	Other Motions
6/13/2024	Rachel Steyer	0.2	\$750	\$150	reviewing BBK edits to opposition motion for sanctions	Other Motions
6/13/2024	Rachel Steyer	0.2	\$750	\$150	reviewing updated Kailes draft declaration ISO opposition to sanctions	Other Motions
6/13/2024	Rachel Steyer	1.1	\$750	\$825	reviewing opposition motion and filling in declaration citations	Other Motions
6/13/2024	Rachel Steyer	0.2	\$750	\$150	reviewing updated Kailes declaration ISO opposition to sanctions motion	Other Motions
6/13/2024	Travis Close	1.7	\$850	\$1,445	Revisions to declaration of june kailes iso opposition to motion for sanctions	Case Organization, Planning and Strategy
6/13/2024	Travis Close	0.5	\$850	\$425	Emails to MTJ, GBW re: resolving factual differences in recollection of events from May 29	Case Organization, Planning and Strategy
6/13/2024	Travis Close	0.4	\$850	\$340	Calls with GBW re: revisions needed to declarations of Kailes, TCC, and Jestrabek-Hart supporting opp. to motion for sanctions	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/13/2024	Travis Close	1.4	\$850	\$1,190	Legal research re: cases interpreting personal rights for residents of RCFE facilities	Case Organization, Planning and Strategy
6/13/2024	Travis Close	0.4	\$850	\$340	Email to MTJ re: photos on record of evacuation chairs at San Ramon facility	Case Organization, Planning and Strategy
6/13/2024	Travis Close	0.2	\$850	\$170	Email to GG (co-counsel) re: incorporating revisions to declaration of BJH	Case Organization, Planning and Strategy
6/13/2024	Travis Close	0.4	\$850	\$340	Call with MTJ re: aligning recollections of places where Ms. Kailes was present at San Ramon	Case Organization, Planning and Strategy
6/13/2024	Travis Close	0.3	\$850	\$255	Review and analyze email history with June Kailes to confirm instructions regarding May 29 site visits	Case Organization, Planning and Strategy
6/13/2024	Travis Close	0.4	\$850	\$340	Call with Bernie Jestrabek-Hart re: reviewing and revising declaration in support of opposition to motion for sanctions	Class Outreach and Contact
6/13/2024	Travis Close	1.8	\$850	\$1,530	Review, analyze, and propose revisions for draft MPA iso opposition to motion for sanctions	Other Motions
6/13/2024	Travis Close	0.8	\$850	\$680	Revisions to declaration of TCC in support of opposition to motion for sanctions	Other Motions
6/13/2024	Travis Close	0.6	\$850	\$510	Revisions to draft declaration of Bernie Jestrabek-Hart in support of opposition to motion for sanctions	Other Motions
6/14/2024	Guy Wallace	2.4	\$1,350	\$3,240	preparation and drafting of introduction to brief in opposition to Defendants' second motion for sanctions	Other Motions
6/14/2024	Guy Wallace	4.8	\$1,350	\$6,480	revise and edit draft brief in opposition to Defendants' second motion for sanctions; declarations of MTJ; TCC; BJH re same	Other Motions
6/14/2024	Guy Wallace	3.9	\$1,350	\$5,265	revise and edit final draft of brief in opposition to Defendants' motion for sanctions; incorporate further edits from RBGG; com's with BBK; BU; MTJ; JAU; TCC; RLS re same (1.5)	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/14/2024	Jennifer Bybee	0.2	\$925	\$185	Review com's between RLS, MTJ, TCC, and GBW re draft of opposition to sanctions and supporting declarations	Other Motions
6/14/2024	Jennifer Bybee	1.6	\$925	\$1,480	Create redline edit of opposition to motion for sanctions	Other Motions
6/14/2024	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re opposition to motion for sanctions	Other Motions
6/14/2024	Jennifer Bybee	0.5	\$925	\$463	Com's with GBW re opposition to motion for sanctions and filing	Other Motions
6/14/2024	Mark Johnson	0.3	\$1,150	\$345	review draft intro for brief in opposition to sanctions mtn; draft and propose alternative opening paragraph.	Other Motions
6/14/2024	Mark Johnson	4.0	\$1,150	\$4,600	work on opp to mtn for sanctions. supporting declarations, coms w/ GBW re same	Other Motions
6/14/2024	Rachel Steyer	0.8	\$750	\$600	attempting class outreach, leaving VMs, updating notes in spreadsheet	Class Outreach and Contact
6/14/2024	Rachel Steyer	0.2	\$750	\$150	received call back from daughter of current resident, discussed case, set up intake	Class Outreach and Contact
6/14/2024	Rachel Steyer	0.4	\$750	\$300	drafting proposed resposne to former putative class member's attorney providing case update	Class Outreach and Contact
6/14/2024	Rachel Steyer	0.2	\$750	\$150	reviewing draft introductino to opposition	Other Motions
6/14/2024	Rachel Steyer	1.6	\$750	\$1,200	reviewing and adding in declaration cites to opposition motion	Other Motions
6/14/2024	Rachel Steyer	0.3	\$750	\$225	reviewing MTJ declaration ISO opposition to sanctions motion	Other Motions
6/14/2024	Rachel Steyer	0.3	\$750	\$225	review of MTJ declaration ISO opposition to sanctions motion	Other Motions
6/14/2024	Rachel Steyer	1.0	\$750	\$750	reviewing and proofreading opposition motion	Other Motions
6/14/2024	Rachel Steyer	0.2	\$750	\$150	call with GBW to review and double check cites	Other Motions
6/14/2024	Rachel Steyer	0.2	\$750	\$150	call with TCC re finalizing motion	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/14/2024	Travis Close	1.3	\$850	\$1,105	Further edits to Kailes declaration before sending for final review & signature	Case Organization, Planning and Strategy
6/14/2024	Travis Close	0.3	\$850	\$255	Call to June Kailes re: final review & proposed changed to declaration before signing	Case Organization, Planning and Strategy
6/14/2024	Travis Close	0.3	\$850	\$255	Call to MTJ re: requirement to meet and confer before filing discovery motions / for sanctions	Case Organization, Planning and Strategy
6/14/2024	Travis Close	0.2	\$850	\$170	Call to JUB re: priority for additional edits to opposition brief	Case Organization, Planning and Strategy
6/14/2024	Travis Close	0.2	\$850	\$170	Call to Bernie Jestrabek-Hart re: final review of declaration before signature	Case Organization, Planning and Strategy
6/14/2024	Travis Close	0.4	\$850	\$340	Review and analyze edits by RLS to draft MPA re: opposition to sanctions motion	Case Organization, Planning and Strategy
6/14/2024	Travis Close	0.4	\$850	\$340	Review and analyze edits by JUB re: opposition to defs motion for sanctions	Case Organization, Planning and Strategy
6/14/2024	Travis Close	0.3	\$850	\$255	Review, analyze, propose edits to introduction for MPA iso opposition to motion for sanctions	Case Organization, Planning and Strategy
6/14/2024	Travis Close	0.2	\$850	\$170	Email to MTJ, GBW re: issue with June's expertise in ADAAG/ADAS/CBC	Case Organization, Planning and Strategy
6/14/2024	Travis Close	0.3	\$850	\$255	Review and analyze edits by MTJ to draft MPA iso opposition to motion for sanctions	Case Organization, Planning and Strategy
6/14/2024	Travis Close	0.7	\$850	\$595	Additional revisions to latest draft of MPA ISO opposition to motion for sanctions	Case Organization, Planning and Strategy
6/14/2024	Travis Close	1.4	\$850	\$1,190	Further revisions & final changes to draft declaration of TCC	Case Organization, Planning and Strategy
6/14/2024	Travis Close	0.8	\$850	\$680	Final proofread of MPA iso opposition to motion for sanctions & send to LEC with signed declarations for filing	Case Organization, Planning and Strategy
6/14/2024	Travis Close	0.3	\$850	\$255	Calls to Bernie Jestrabek-Hart re: electronic signature needed for final declaration	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/14/2024	Travis Close	1.7	\$850	\$1,445	Additional revisions to MPA iso opposition to motion for sanctions citations to declarations of TCC, JIK, BJH)	Other Motions
6/15/2024	Guy Wallace	1.8	\$1,350	\$2,430	preparation of preliminary notes re hearing on Defendants' second motion for sanctions	Other Motions
6/17/2024	Guy Wallace	0.6	\$1,350	\$810	com's with Mastin re responses to Defendants' opposition to motion re Phase Two facilities	Experts (Including Retention)
6/17/2024	Rachel Steyer	1.0	\$750	\$750	conducted partial intake call	Class Outreach and Contact
6/17/2024	Rachel Steyer	0.8	\$750	\$600	conducted further partial intake call, scheduled follow up to complete intake	Class Outreach and Contact
6/17/2024	Rachel Steyer	0.2	\$750	\$150	reviewing notes and updating spreadsheet	Class Outreach and Contact
6/17/2024	Rachel Steyer	0.3	\$750	\$225	conducted follow up call with daughter of current resident, discussed case and answered questions, no pertinent access issues	Class Outreach and Contact
6/17/2024	Rachel Steyer	5.2	\$750	\$3,900	ongoing review of production and updating index	Discovery (Non-Deposition)
6/17/2024	Travis Close	1.7	\$850	\$1,445	Legal research re: whether owner or operator's financials are subject to readily accessible determination	Case Organization, Planning and Strategy
6/17/2024	Travis Close	1.6	\$850	\$1,360	Review and analyze training materials & service alignment documents recently produced for info on benchmark formula/algorithm	Case Organization, Planning and Strategy
6/17/2024	Travis Close	0.4	\$850	\$340	Email to MTJ re: next steps for discovery priorities	Case Organization, Planning and Strategy
6/17/2024	Travis Close	2.4	\$850	\$2,040	Draft chart of recent discovery joint letter briefs, issues & orders	Case Organization, Planning and Strategy
6/18/2024	Travis Close	2.3	\$850	\$1,955	Draft memo re: readily achievable barrier removal at plaintiffs' facilities	Case Organization, Planning and Strategy
6/18/2024	Travis Close	1.6	\$850	\$1,360	Legal research re: readily achievable barrier removal in common areas of public accommodations	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/18/2024	Travis Close	1.5	\$850	\$1,275	Legal research re: methods of calculation for readily achievable barrier removal in residential facilities	Case Organization, Planning and Strategy
6/18/2024	Travis Close	0.5	\$850	\$425	Review and analyze recent facility evaluation and complaint investigation reports for Brookhurst, San Ramon, Scotts Valley, and Tracy facilities	Case Organization, Planning and Strategy
6/18/2024	Travis Close	0.2	\$850	\$170	Email to LEC re: checking opposition to motion for sanctions for errata	Case Organization, Planning and Strategy
6/18/2024	Travis Close	0.9	\$850	\$765	Draft memo re: following up on post site inspection tasks for San Ramon and Scotts Valley facilities	Case Organization, Planning and Strategy
6/18/2024	Travis Close	0.6	\$850	\$510	Review and analyze building records produced for San Ramon and Scotts Valley facilities for info re: alterations to stairwells and other egress locations	Case Organization, Planning and Strategy
6/20/2024	Guy Wallace	3.8	\$1,350	\$5,130	preparation for moot for hearing re motion to certify subclasses; preparation of affirmative argument for certification of subclasses	Class Certification
6/20/2024	Rachel Steyer	1.9	\$750	\$1,425	attempted class outreach, leaving VMs, updating and reviewing notes in spreadsheet	Class Outreach and Contact
6/20/2024	Rachel Steyer	0.2	\$750	\$150	spoke with daughter of current resident, scheduled follow up call to better accommodate her availability	Class Outreach and Contact
6/20/2024	Rachel Steyer	0.7	\$750	\$525	completed intake call with Kathleen Wilson-Powellson	Class Outreach and Contact
6/20/2024	Rachel Steyer	0.4	\$750	\$300	call with daughter-in-law of current resident, discussed case and agreed that she will follow up	Class Outreach and Contact
6/20/2024	Rachel Steyer	0.2	\$750	\$150	follow up call w/Jeffrey Morris, discussed case, scheduled intake call for next week	Class Outreach and Contact
6/20/2024	Rachel Steyer	0.2	\$750	\$150	spoke w/son of current resident, no access issues as resident does not have mobility disability	Class Outreach and Contact
6/20/2024	Rachel Steyer	1.7	\$750	\$1,275	review of new productions, updating master index/spreadsheet	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/20/2024	Travis Close	1.5	\$850	\$1,275	Legal research re: ADA barrier removal provisions in real estate contracts	Case Organization, Planning and Strategy
6/20/2024	Travis Close	1.7	\$850	\$1,445	Legal research re: REIT contracts and provisions requiring compliance with federal and state accessibility regulations	Case Organization, Planning and Strategy
6/20/2024	Travis Close	0.4	\$850	\$340	Email to LEC re: latest 10-k reports and financials data needed for analysis	Case Organization, Planning and Strategy
6/20/2024	Travis Close	0.3	\$850	\$255	Email to GBW re: question about readily achievable barrier removal provisions in commercial real estate	Case Organization, Planning and Strategy
6/21/2024	Guy Wallace	1.4	\$1,350	\$1,890	zoom with GG; JY; BU; MTJ; TCC; RLS re preparation for hearing on motion to certify subclasses	Class Certification
6/21/2024	Guy Wallace	2.1	\$1,350	\$2,835	preparation for moot re argument on motion to certify subclasses	Class Certification
6/21/2024	Guy Wallace	2.7	\$1,350	\$3,645	preparation of potential questions and responses re same for hearing on motion to certify subclasses	Class Certification
6/21/2024	Mark Johnson	1.1	\$1,150	\$1,265	Team zoom mtg re class cert argument, mock argument, discovery	Class Certification
6/21/2024	Mark Johnson	0.3	\$1,150	\$345	coms (email and phone) w/ GBW re class cert arguments for 6/27 hearing.	Class Certification
6/21/2024	Mark Johnson	0.2	\$1,150	\$230	call w T Close re various discovery issues for follow up, recent production of issue registers and rog responses	Discovery (Non-Deposition)
6/21/2024	Mark Johnson	0.1	\$1,150	\$115	email to OC re adequacy of rog responses, meet and confer	Discovery (Non-Deposition)
6/21/2024	Mark Johnson	0.5	\$1,150	\$575	review Ds supp responses to rogs re access barriers; draft memo re same	Discovery (Non-Deposition)
6/21/2024	Mark Johnson	0.6	\$1,150	\$690	conference w/ Thornton, Umpierre re expert depo scheduling for Schroyer, Flores	Experts (Including Retention)
6/21/2024	Mark Johnson	0.1	\$1,150	\$115	email to OC re expert depo scheduling.	Experts (Including Retention)
6/21/2024	Mark Johnson	0.7	\$1,150	\$805	Review and analyze D's reply iso mtn for sanctions	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/21/2024	Rachel Steyer	1.1	\$750	\$825	weekly meeting with RBGG, BSU, MTJ, GBW, TCC re prep and moot for class cert hearing	Case Organization, Planning and Strategy
6/21/2024	Rachel Steyer	0.8	\$750	\$600	further review and cross checking of names for class outreach to confirm do not contacts	Class Outreach and Contact
6/21/2024	Rachel Steyer	1.0	\$750	\$750	attempted class outreach, left VMs, updating notes in spreadsheet	Class Outreach and Contact
6/21/2024	Rachel Steyer	0.2	\$750	\$150	call with son of current resident, discussed case, no issues of note	Class Outreach and Contact
6/21/2024	Rachel Steyer	0.3	\$750	\$225	call back with son of current resident, discussed case and answered questions, set up intake call	Class Outreach and Contact
6/21/2024	Rachel Steyer	0.3	\$750	\$225	call with son of current resident, discussed case, agreed to prepare mailer and that he would follow up after further review	Class Outreach and Contact
6/21/2024	Rachel Steyer	2.1	\$750	\$1,575	reviewing and updating discovery index	Discovery (Non-Deposition)
6/21/2024	Rachel Steyer	0.2	\$750	\$150	reviewing internal correspondence btwn RBGG, MTJ, GBW, TCC, BSU re questions asked during moot session to prep for hearing	Other Motions
6/21/2024	Rachel Steyer	0.5	\$750	\$375	reviewing defendants' reply re motion for sanctions	Other Motions
6/21/2024	Rachel Steyer	0.5	\$750	\$375	reviewing RBGG notes from moot	Pleadings and Motions Re: Pleadings
6/21/2024	Travis Close	1.3	\$850	\$1,105	Review and analyze issue registers produced by defendants re: transportation-related complaints from 2021-2024	Case Organization, Planning and Strategy
6/21/2024	Travis Close	0.3	\$850	\$255	Email to MTJ, GBW, RAB re: more info needed to determine how transportation-complaint search was performed by defendants for issue registers	Case Organization, Planning and Strategy
6/21/2024	Travis Close	1.5	\$850	\$1,275	Legal research re: pattern and practice civil rights cases granting class cert where there was no written policy of discrimination	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/21/2024	Travis Close	1.3	\$850	\$1,105	Analysis of commonality of residential unit types between the six plaintiffs' facilities	Case Organization, Planning and Strategy
6/21/2024	Travis Close	1.2	\$850	\$1,020	Analysis of evidence of plaintiffs' & class representatives' low vision/disabilities	Case Organization, Planning and Strategy
6/21/2024	Travis Close	0.9	\$850	\$765	Review and analyze 2021-2024 issue registers for Brookhurst and Scotts Valley facilities	Discovery (Non-Deposition)
6/21/2024	Travis Close	1.0	\$850	\$850	Review and analyze 2021-2024 issue registers for Tracy and San Ramon facilities	Discovery (Non-Deposition)
6/22/2024	Guy Wallace	2.4	\$1,350	\$3,240	preparation of notes for hearing on motion to certify subclasses; answers to potential questions from moot and otherwise	Class Certification
6/24/2024	Guy Wallace	1.5	\$1,350	\$2,025	preparation of notes for hearing on motion re subclasses	Class Certification
6/24/2024	Guy Wallace	3.4	\$1,350	\$4,590	preparation of notes re potential questions at hearing on motion to certify subclasses	Class Certification
6/24/2024	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of briefs re Defendants' motion to clarify the class definition re FSP claim	Other Motions
6/24/2024	Guy Wallace	1.3	\$1,350	\$1,755	com's with GG; JY; BBK; MTJ re preparation for hearing on motion to clarify FSP class	Other Motions
6/24/2024	Mark Johnson	0.8	\$1,150	\$920	Zoom mtg w/ Grunfeld, Wallace, Bien-Kahn, Steyer, Close, Spiegel, Edmunson re strategy and points to make on mtn for clarification; scope of mtn to compel contention interrogatories.	Other Motions
6/24/2024	Mark Johnson	0.9	\$1,150	\$1,035	legal research re contention rogs and expert opinion for mtn to compel contention rog supplemental responses.	Other Motions
6/24/2024	Mark Johnson	0.1	\$1,150	\$115	com w/ OC Bertino re scheduling meet and confer re contention rogs.	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/24/2024	Mark Johnson	0.2	\$1,150	\$230	Review email from TCC re accuracy of data collection by Brookdale re power chairs for motion for clarification; respond to same.	Other Motions
6/24/2024	Mark Johnson	1.1	\$1,150	\$1,265	further legal research re contention interrogatories and legal opinions.	Other Motions
6/24/2024	Mark Johnson	2.3	\$1,150	\$2,645	work on analysis of D's supp responses re disputed access barriers, draft memo re same and compile exhibits; email to CoC re same	Other Motions
6/24/2024	Mark Johnson	0.8	\$1,150	\$920	begin work on mtn to compel further responses re disputed access barriers	Other Motions
6/24/2024	Rachel Steyer	0.8	\$750	\$600	meeting with RBGG, GBW, MTJ, TCC to review and discuss prep for motion for clarification at hearing	Case Organization, Planning and Strategy
6/24/2024	Rachel Steyer	0.3	\$750	\$225	received call back from family member of current resident, discussed case and answered questions, agreed to f/u re arbitration issue	Class Outreach and Contact
6/24/2024	Rachel Steyer	0.4	\$750	\$300	attempted class outreach, leaving vms, updating notes in spreadsheet	Class Outreach and Contact
6/24/2024	Rachel Steyer	1.6	\$750	\$1,200	completing review and update of discovery index	Discovery (Non-Deposition)
6/24/2024	Rachel Steyer	3.2	\$750	\$2,400	reviewing and watching various brookdale training videos recently produced	Discovery (Non-Deposition)
6/24/2024	Rachel Steyer	0.2	\$750	\$150	gathering Mastin and Waters declarations (preparing extractions) for GBW	Misc. Research
6/24/2024	Travis Close	2.3	\$850	\$1,955	Begin drafting discovery memo re: status of fleet safety policy class productions	Case Organization, Planning and Strategy
6/24/2024	Travis Close	0.6	\$850	\$510	Review and analyze defendants' reply iso motion for sanctions	Case Organization, Planning and Strategy
6/24/2024	Travis Close	0.8	\$850	\$680	Legal research re: whether expert testimony can be excluded due to lack of rule 34 inspection notice	Case Organization, Planning and Strategy
6/24/2024	Travis Close	1.1	\$850	\$935	Legal research re: standing of former class members to pursue declaratory relief for past harms	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/24/2024	Travis Close	1.7	\$850	\$1,445	Create chart analyzing issue registers produced regarding transportation class	Discovery (Non-Deposition)
6/24/2024	Travis Close	0.7	\$850	\$595	Meeting with GBW, RLS, MTJ, & co-counsel re: oral argument prep for motion to clarify class	Other Motions
6/25/2024	Guy Wallace	5.4	\$1,350	\$7,290	preparation and drafting of responses to questions from moot re motion to certify subclasses	Class Certification
6/25/2024	Guy Wallace	5.2	\$1,350	\$7,020	preparation of notes for hearing on motion to certify subclasses; review and analysis of opening brief; opposition brief; reply brief	Class Certification
6/25/2024	Mark Johnson	3.3	\$1,150	\$3,795	Review Mastin and Waters opening and reply expert reports and Rule 26 report submitted iso class cert mtn for subclasses, draft memo summarizing same for GBW for prep for hearing.	Class Certification
6/25/2024	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW re class cert hearing on subclasses, compilation of universal barriers.	Class Certification
6/25/2024	Mark Johnson	0.5	\$1,150	\$575	meet and confer w/ OC Rutner, Jacobsen, Bertino and Gravante re D responses to rogs re access barriers	Discovery (Non-Deposition)
6/25/2024	Mark Johnson	0.4	\$1,150	\$460	draft email to OC confirming meet and confer and admission of 778 barriers on Exhibit A	Discovery (Non-Deposition)
6/25/2024	Mark Johnson	0.2	\$1,150	\$230	review outline from G Grunfeld re mtn to clarify	Other Motions
6/25/2024	Mark Johnson	2.8	\$1,150	\$3,220	review and compare barrier list from exhibit A to Ds disputed barriers and prepare mark up of same; draft com to COC re same and re points to consider/make for meet and confer re rog responses on barriers.	Other Motions
6/25/2024	Rachel Steyer	0.2	\$750	\$150	call w/family member of current resident, discussed case, no access issues at the moment	Class Outreach and Contact
6/25/2024	Rachel Steyer	1.4	\$750	\$1,050	attempted class outreach, leaving VMs, updating notes in spreadsheet	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/25/2024	Rachel Steyer	0.4	\$750	\$300	received call back from daughter of former resident, discussed case and answered questions, no disabilities/pertinent issues	Class Outreach and Contact
6/25/2024	Rachel Steyer	0.2	\$750	\$150	call with family member of resident, discussed case, requested mailer for further review	Class Outreach and Contact
6/25/2024	Rachel Steyer	0.2	\$750	\$150	gathering up benchmark data docs produced and transmitting to MTJ	Discovery (Non-Deposition)
6/25/2024	Rachel Steyer	1.6	\$750	\$1,200	reviewing production for ADA docs re resident payments for alterations	Discovery (Non-Deposition)
6/25/2024	Rachel Steyer	0.4	\$750	\$300	updating chart for GBW to provide further visual impairment descriptions	Other Motions
6/25/2024	Rachel Steyer	0.6	\$750	\$450	reviewing outline and authority circulated by RBGG re motion for clarification	Other Motions
6/25/2024	Travis Close	0.9	\$850	\$765	Review and analyze recently issued facility evaluation and complaint investigation reports from Danville, Gardens of Tarzana, Uptown Whittier, Garden Grove, Valley View, Auburn, Slyvan Ranch, North Euclid, and Kettleman Lane facilities	Case Organization, Planning and Strategy
6/25/2024	Travis Close	0.4	\$850	\$340	Review and analyze chart by MTJ summarizing Def's supp responses to ROGs (barriers disputed at each facility)	Case Organization, Planning and Strategy
6/25/2024	Travis Close	0.8	\$850	\$680	Review and analyze prior history re: requests for issue registers re: fleet safety policy	Case Organization, Planning and Strategy
6/25/2024	Travis Close	1.6	\$850	\$1,360	Continue drafting memo re: status of issue registers & FSP-related discovery	Case Organization, Planning and Strategy
6/25/2024	Travis Close	0.6	\$850	\$510	Meet and confer with defendants, MTJ re: supp. responses to ROGs regarding access barrier admissions	Case Organization, Planning and Strategy
6/25/2024	Travis Close	0.3	\$850	\$255	Finalize notes re: today's meet and confer with defendants	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/25/2024	Travis Close	2.4	\$850	\$2,040	Continue drafting memo re: status of FSP-related discovery	Case Organization, Planning and Strategy
6/25/2024	Travis Close	0.4	\$850	\$340	Prep for meet and confer with defendants re: supp responses to ROGs (review prior correspondence and def's responses)	Communications With Opposing Counsel
6/26/2024	Guy Wallace	8.8	\$1,350	\$11,880	preparation of notes for hearing on motion re subclasses; preparation of responses re potential questions from J. Gilliam	Class Certification
6/26/2024	Mark Johnson	0.1	\$1,150	\$115	emails w/ GBW re time periods of operation of facilities at issue on access class cert mtn	Class Certification
6/26/2024	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW re argument on class cert mtn re subclasses, common barriers, typicality	Class Certification
6/26/2024	Mark Johnson	0.5	\$1,150	\$575	review and analyzed GBW proposed responses to potential questions on class cert argument..	Class Certification
6/26/2024	Mark Johnson	2.4	\$1,150	\$2,760	further review of GBW Q&A for oral argument prep; draft revisions and additions to same.	Class Certification
6/26/2024	Mark Johnson	0.2	\$1,150	\$230	draft email to OC re expert depo scheduling, possible stipulation	Communications With Opposing Counsel
6/26/2024	Mark Johnson	0.2	\$1,150	\$230	call w/ Brian Umpierre re scheduling expert depositions	Experts (Including Retention)
6/26/2024	Mark Johnson	0.2	\$1,150	\$230	draft email to Thornton, Marks, Umpierre re scheduling of Flores depo and coms w/ D re same.	Experts (Including Retention)
6/26/2024	Mark Johnson	0.3	\$1,150	\$345	review example of supp rog responses re alterations; draft email to J Maher re pulling and reviewing related docs and preparing trial prep packages for each alteration at each facility.	Trial and Pretrial Preparation
6/26/2024	Rachel Steyer	1.3	\$750	\$975	conducted intake call with son of current resident	Class Outreach and Contact
6/26/2024	Rachel Steyer	1.0	\$750	\$750	attempted class outreach, leaving VMs, reviewing and updating notes in spreadsheet	Class Outreach and Contact
6/26/2024	Rachel Steyer	0.2	\$750	\$150	reviewing TCC memo summarizing FSP production	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/26/2024	Rachel Steyer	2.0	\$750	\$1,500	further review of production for ADA access fixes info	Discovery (Non-Deposition)
6/26/2024	Rachel Steyer	0.3	\$750	\$225	email to GBW summarizing evidence in record re access fixes	Other Motions
6/26/2024	Rachel Steyer	0.6	\$750	\$450	reviewing MTJ and GBW notes re hearing prep questions and answers/responses	Other Motions
6/26/2024	Travis Close	1.5	\$850	\$1,275	Finish drafting memo re: status of FSP-related discovery and send to team	Case Organization, Planning and Strategy
6/26/2024	Travis Close	1.4	\$850	\$1,190	research whether cost of liability/compliance may be considered as a reason for denying class certification	Case Organization, Planning and Strategy
6/26/2024	Travis Close	0.6	\$850	\$510	Review and analyze responses by GBW re: moot court questions for preparation of oral argument	Case Organization, Planning and Strategy
6/26/2024	Travis Close	0.7	\$850	\$595	Review and analyze defendants' supplemental responses regarding alterations made to plaintiffs' facilities	Case Organization, Planning and Strategy
6/26/2024	Travis Close	0.3	\$850	\$255	Email to GBW re: clarification regarding accuracy of Brookdale's resident assessment software	Case Organization, Planning and Strategy
6/26/2024	Travis Close	1.6	\$850	\$1,360	Review and analyze evidence of Brookdale's assessment software over- or under- counting residents with mobility disabilities who use electric devices	Case Organization, Planning and Strategy
6/26/2024	Travis Close	1.4	\$850	\$1,190	Review and analyze history of correspondence with opposing counsel re: production of FSP-related discovery	Case Organization, Planning and Strategy
6/26/2024	Travis Close	0.2	\$850	\$170	Email to GG (co-counsel) confirming that no FSP class list was produced	Case Organization, Planning and Strategy
6/27/2024	Guy Wallace	1.9	\$1,350	\$2,565	preparation of note for hearing on motion re subclasses; revise and edit same	Class Certification
6/27/2024	Guy Wallace	2.4	\$1,350	\$3,240	preparation for hearing on motion re subclasses; oral argument	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/27/2024	Guy Wallace	1.9	\$1,350	\$2,565	prepare for and attend hearing on motion re subclasses; analysis of results of same	Class Certification
6/27/2024	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re Brookdale hearing	Other Motions
6/27/2024	Mark Johnson	1.6	\$1,150	\$1,840	appear for certification of subclass certification mtn	Class Certification
6/27/2024	Mark Johnson	1.0	\$1,150	\$1,150	meeting w/ clients and co-counsel following class certification hearing.	Class Certification
6/27/2024	Mark Johnson	1.5	\$1,150	\$1,725	review common barrier tables and expert declarations	Class Certification
6/27/2024	Mark Johnson	0.4	\$1,150	\$460	calls w/ GBW re analysis of hearing on mtn to certify subclasses.	Class Certification
6/27/2024	Mark Johnson	0.1	\$1,150	\$115	coms w/ RAB re document review concerning alterations documents.	Discovery (Non-Deposition)
6/27/2024	Mark Johnson	0.1	\$1,150	\$115	com w/ D Marks re scheduling expert depos and call re same.	Experts (Including Retention)
6/27/2024	Rachel Steyer	0.8	\$750	\$600	attempted class outreach, leaving VMs, updating and reviewing notes in spreadsheet	Class Outreach and Contact
6/27/2024	Rachel Steyer	0.6	\$750	\$450	spoke with wife of current resident, discussed case, answered questions	Class Outreach and Contact
6/27/2024	Rachel Steyer	0.3	\$750	\$225	organizing intake responsible parties' documents and emails provided	Discovery (Non-Deposition)
6/27/2024	Rachel Steyer	0.6	\$750	\$450	comms after hearing with GBW, MTJ, RBGG re hearing, other tasks and assignments re discovery and trial prep	Other Motions
6/27/2024	Travis Close	2.4	\$850	\$2,040	Draft second list of prioritized reading/review for June Kailes	Case Organization, Planning and Strategy
6/27/2024	Travis Close	1.4	\$850	\$1,190	Review and analyze recent productions re: updated service alignment materials for info on benchmarks/hours/budgets relevant for emergency evacuation purposes	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/27/2024	Travis Close	1.8	\$850	\$1,530	Review, analyze, & collect research on studies of emergency evacuation time predictions for large buildings	Case Organization, Planning and Strategy
6/28/2024	Guy Wallace	1.8	\$1,350	\$2,430	com's with GG; JY; BBK; BU; MTJ; TCC re results of 6/27 hearing; preparation of summary judgment; further discovery needs	Case Organization, Planning and Strategy
6/28/2024	Mark Johnson	1.0	\$1,150	\$1,150	zoom mtg w/ Spiegel, Wallace, Grunfeld, Close, Yellin, Edmundson, Umpierre re remaining discovery, motion practice, pre-trial actions and trial prep	Trial and Pretrial Preparation
6/28/2024	Travis Close	0.8	\$850	\$680	Meeting with MTJ, GBW, and co-counsel re: next steps for trial preparation, discovery motions, depositions, etc.	Case Organization, Planning and Strategy
6/28/2024	Travis Close	0.7	\$850	\$595	Call with MTJ re: de-brief after yesterday's hearing before judge Gilliam	Case Organization, Planning and Strategy
6/28/2024	Travis Close	0.4	\$850	\$340	Call with GBW re: summary of yesterday's hearing with Judge Gilliam	Case Organization, Planning and Strategy
6/28/2024	Travis Close	0.3	\$850	\$255	Call with LEC re: new document review assignment for emergency evacuation	Case Organization, Planning and Strategy
6/28/2024	Travis Close	0.2	\$850	\$170	Email to JIK re: availability for deposition in august-september	Case Organization, Planning and Strategy
6/28/2024	Travis Close	0.2	\$850	\$170	Email to DJC re: availability for deposition in august-september	Case Organization, Planning and Strategy
6/28/2024	Travis Close	0.3	\$850	\$255	Review and analyze amended pre-trial schedule & calendar by MTJ	Case Organization, Planning and Strategy
6/28/2024	Travis Close	0.7	\$850	\$595	Research California building code's requirements for fire doors in senior living facilities	Case Organization, Planning and Strategy
6/28/2024	Travis Close	0.6	\$850	\$510	Research California building code's requirements for fire sprinklers in senior living facilities	Case Organization, Planning and Strategy
6/28/2024	Travis Close	1.3	\$850	\$1,105	Legal research re: amendment to pleadings without filing a motion under FRCP Rule 15	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
6/28/2024	Travis Close	0.7	\$850	\$595	Review and analyze discovery history re: 56 categories ordered for production	Case Organization, Planning and Strategy
6/28/2024	Travis Close	1.2	\$850	\$1,020	Analyze list of disputed barriers from ROG responses to determine number of measurements claimed as outside of access by residents	Case Organization, Planning and Strategy
7/1/2024	Guy Wallace	1.0	\$1,350	\$1,350	com's with JGT; BU; MTJ re rebuttal reports; expert depositions	Depositions
7/1/2024	Guy Wallace	1.1	\$1,350	\$1,485	com's with MTJ re discovery issues and further com's with Defendants re same	Discovery (Non-Deposition)
7/1/2024	Mark Johnson	0.7	\$1,150	\$805	calls w/ GBW re Ds' failure to produce class list for transportation class, additional discovery to be served to address same	Discovery (Non-Deposition)
7/1/2024	Mark Johnson	0.2	\$1,150	\$230	further coms w/ GBW re additional doc requests and communication w/ OC re failure to produce class list.	Discovery (Non-Deposition)
7/1/2024	Mark Johnson	2.2	\$1,150	\$2,530	draft thirteenth set of document requests, coms w/ OCC re same and make revisions	Discovery (Non-Deposition)
7/1/2024	Mark Johnson	1.0	\$1,150	\$1,150	Call w Marks, Thornton, Wallace, Umpierre re scheduling issues re Flores and Schroyer; strategy re same and analysis of Defendants' position.	Experts (Including Retention)
7/1/2024	Mark Johnson	0.8	\$1,150	\$920	review email from OC Bertino re expert depositions and draft proposed responsive email for consideration of COC	Experts (Including Retention)
7/1/2024	Mark Johnson	0.1	\$1,150	\$115	pre-call w/ GBW re expert depo scheduling, Flores invoices	Experts (Including Retention)
7/1/2024	Mark Johnson	0.6	\$1,150	\$690	review email from E Rutner re transportation class list; draft proposed email response re same; coms/ w COC re edits; revise, finalize and send.	Other Motions
7/1/2024	Travis Close	0.8	\$850	\$680	Analyze scope of Brookdale's production of residency agreements within previous 12 months	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/1/2024	Travis Close	0.7	\$850	\$595	Review and analyze documents on file & history or correspondence from resident/family member Heather Earnst	Case Organization, Planning and Strategy
7/1/2024	Travis Close	1.6	\$850	\$1,360	Review and analyze history of orders by Magistrate Judge Beeler to determine presumptive times for production of discovery	Case Organization, Planning and Strategy
7/1/2024	Travis Close	1.8	\$850	\$1,530	Analysis of Brookdale's date of productions for residency agreements outside of the six facilities currently at issue	Case Organization, Planning and Strategy
7/1/2024	Travis Close	1.5	\$850	\$1,275	Review, analyze, and organize Brookdale's most recent productions for materials related to emergency evacuation at the six facilities	Case Organization, Planning and Strategy
7/1/2024	Travis Close	1.2	\$850	\$1,020	Finish drafting second prioritized list of documents for review by Kailes & compiling necessary new documents for review	Case Organization, Planning and Strategy
7/1/2024	Travis Close	0.2	\$850	\$170	Email to TLM re: contacts with Brookdale class members	Class Outreach and Contact
7/2/2024	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ re Defendants' proposed deposition schedule; discovery disputes	Depositions
7/2/2024	Mark Johnson	0.6	\$1,150	\$690	draft memo for team re our expert availability for depositions; strategy for scheduling and defending same; strategy for taking D expert depositions.	Depositions
7/2/2024	Mark Johnson	0.1	\$1,150	\$115	review email from OC Jacobsen and revised set of interrogatory responses w/ correction	Discovery (Non-Deposition)
7/2/2024	Mark Johnson	0.3	\$1,150	\$345	review D email response re twelfth set of document requests and their production, our production of documents responsive to their third set of RFPs re expert photos and notes; draft email to COC re discussion of same and strategy for responding.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/2/2024	Mark Johnson	0.2	\$1,150	\$230	review email from OC re refusal to respond to thirteenth set of RFPs as new discovery; review order cited, draft email to COC re same and proposed response	Discovery (Non-Deposition)
7/2/2024	Mark Johnson	0.2	\$1,150	\$230	email exchanges w/ RAB, TCC re review of doc production to verify or refute claims of OC in email re production of class list.	Discovery (Non-Deposition)
7/2/2024	Mark Johnson	0.1	\$1,150	\$115	email exchange w/ LEC re ordering transcript; review request and approve filing	Other Motions
7/2/2024	Mark Johnson	0.3	\$1,150	\$345	review email from OC re production of class list for FSP class; draft email to COC re same and points to make in response, decision whether or proceed with mtn to compel.	Other Motions
7/2/2024	Mark Johnson	0.2	\$1,150	\$230	review Order on mtn for reconsideration of Omole, Rubin depositions; draft email to COC re scheduling same, anticipated dispute on scope	Other Motions
7/2/2024	Travis Close	2.4	\$850	\$2,040	Review, analyze, and organize current production of issue registers at CA facilities	Case Organization, Planning and Strategy
7/2/2024	Travis Close	0.4	\$850	\$340	Emails to GBW, MTJ re: dates of availability for June Kailes and Doug Cross for deposition	Case Organization, Planning and Strategy
7/2/2024	Travis Close	0.3	\$850	\$255	Email to MTJ re: inaccuracies in representations by J. Bertino in today's email re: recent document productions	Case Organization, Planning and Strategy
7/2/2024	Travis Close	0.7	\$850	\$595	Analysis of duplicate, unreadable, & non-relevant docs produced since court's April 18 order	Case Organization, Planning and Strategy
7/2/2024	Travis Close	0.4	\$850	\$340	Review, analyze, and propose revisions for draft thirteenth set of RFPs	Discovery (Non-Deposition)
7/2/2024	Travis Close	0.8	\$850	\$680	Review and analyze Safety Policy Manual (2022) for info on emergency evacuation planning policies & procedures	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/2/2024	Travis Close	1.7	\$850	\$1,445	Analyze defendants' representations in 7-2-24 email as to adequacy of recent productions; compared to actual documents produced	Discovery (Non-Deposition)
7/2/2024	Travis Close	1.1	\$850	\$935	Analysis of issue registers to determine average number of issues submitted per facility, per year	Discovery (Non-Deposition)
7/3/2024	Guy Wallace	0.8	\$1,350	\$1,080	com's with BU; MTJ re expert depositions of Dr. Flores, Dale Schroyer; Defendants' demands re scheduling of same	Depositions
7/3/2024	Mark Johnson	0.6	\$1,150	\$690	team zoom call with A Spiegel, G Wallace, J Yelin, B Bien-kahn, T Close, D Edmundson, B Umpierre re discovery status and motions, expert discovery, recently served rogs.	Case Organization, Planning and Strategy
7/3/2024	Travis Close	1.3	\$850	\$1,105	Review, analyze, and summarize overview of Brookdale's recent productions of service alignment-related documents	Case Organization, Planning and Strategy
7/3/2024	Travis Close	0.6	\$850	\$510	Draft email to team re: summary of recent service-alignment related documents	Case Organization, Planning and Strategy
7/3/2024	Travis Close	0.7	\$850	\$595	Meeting with MTJ, GBW, BMU, and co-counsel re: recent discovery orders, discovery follow-up, scheduling depositions	Case Organization, Planning and Strategy
7/3/2024	Travis Close	0.2	\$850	\$170	Email to team & co-counsel re: draft letter to defendants regarding follow-up ESI related to transportation complaints	Case Organization, Planning and Strategy
7/3/2024	Travis Close	2.4	\$850	\$2,040	Draft letter to Defendants re: follow-up on FSP-related discover ordered by the Court (custodian ESI and issue registers)	Discovery (Non-Deposition)
7/3/2024	Travis Close	1.6	\$850	\$1,360	Review and analyze defendants' production of videos related to PCC and clinical services for info on data entry relating to markers of mobility/vision disabilities	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/3/2024	Travis Close	1.3	\$850	\$1,105	Review and analyze Brookdale's recent production of staffing and service alignment-related materials, BKD3066711-BKD3067156 (1-47 of 158)	Discovery (Non-Deposition)
7/5/2024	Mark Johnson	0.3	\$1,150	\$345	draft responsive email to OC Rutner re alleged burden of producing discovery, facts supporting same on multiple categories of discovery.	Discovery (Non-Deposition)
7/5/2024	Mark Johnson	0.2	\$1,150	\$230	review and respond to OC Rutner email re expert depositions of Flores and Schroyer, meet and confer and authority for position, Rubin and Omole depositions.	Experts (Including Retention)
7/5/2024	Mark Johnson	0.1	\$1,150	\$115	draft email to COC Thornton, Marks, Umpierre re Flores and Schroyer depositions and Flores availability.	Experts (Including Retention)
7/5/2024	Mark Johnson	0.6	\$1,150	\$690	preliminary review of cases provided by OC on timing of expert reports.	Experts (Including Retention)
7/5/2024	Mark Johnson	0.4	\$1,150	\$460	coms w/ TCC re legal research re timing of expert depositions; review memo of his analysis of cases.	Experts (Including Retention)
7/5/2024	Travis Close	1.7	\$850	\$1,445	legal research on how a party may compel the deposition of a witness who is unavailable	Case Organization, Planning and Strategy
7/5/2024	Travis Close	1.7	\$850	\$1,445	Legal research on how a party may compel the deposition of a witness who is unavailable	Case Organization, Planning and Strategy
7/5/2024	Travis Close	2.3	\$850	\$1,955	Legal research re: cases where court denied motion to compel deposition before rebuttal expert report was due	Case Organization, Planning and Strategy
7/5/2024	Travis Close	1.8	\$850	\$1,530	Review, analyze, and distinguish defendants' cases cited for their argument that a witness must be proposed before rebuttal expert reports are due	Case Organization, Planning and Strategy
7/7/2024	Mark Johnson	0.8	\$1,150	\$920	calls w/ GBW re expert reports and deposition schedule, Ds demand for Flores depo before expert rebuttal due date and before Schroyer.	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/8/2024	Guy Wallace	1.1	\$1,350	\$1,485	com's with Thorton; BU; MTJ re depositions of Dr. Flores; Dale Schroyer and preparation re same	Depositions
7/8/2024	Mark Johnson	0.2	\$1,150	\$230	email exchange w/ OC re Flores depo scheduling and limitations	Depositions
7/8/2024	Mark Johnson	1.6	\$1,150	\$1,840	review selected docs collected by RLS, TCC re service alignment, benchmarks, task times, customization, etc. for transmission to J Thornton for Flores depo prep.	Depositions
7/8/2024	Mark Johnson	0.1	\$1,150	\$115	email exchange w/ RLS re coms w/ FSP class members	Discovery (Non-Deposition)
7/8/2024	Mark Johnson	0.3	\$1,150	\$345	calls w/ GBW re expert depo scheduling, motions to compel further document production	Discovery (Non-Deposition)
7/8/2024	Mark Johnson	1.5	\$1,150	\$1,725	review Flores (2), Allen and Saad Rule 26 reports and prepare summary of opinions from same; compare Flores Rebuttal to Saad, Allen; email to GBW re same (.1)	Experts (Including Retention)
7/8/2024	Mark Johnson	0.5	\$1,150	\$575	team call w/ Wallace, Thornton re Flores availability for deposition; strategy and limitations on same, logistics.	Experts (Including Retention)
7/8/2024	Rachel Steyer	0.2	\$750	\$150	reviewing email from MTJ pre-team meeting with schedules and memos re discovery	Case Organization, Planning and Strategy
7/8/2024	Rachel Steyer	0.6	\$750	\$450	call with family member of current resident, discussed case and answered questions, agreed to wait for further follow up	Class Outreach and Contact
7/8/2024	Rachel Steyer	0.8	\$750	\$600	attempted class outreach, leaving VMs, updating and review notes in spreadsheet	Class Outreach and Contact
7/8/2024	Rachel Steyer	0.6	\$750	\$450	call with decedent of former resident, discussed case, answered questions	Class Outreach and Contact
7/8/2024	Rachel Steyer	0.4	\$750	\$300	call with family member of current resident, discussed case, follow up once she speaks with father	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/8/2024	Rachel Steyer	0.5	\$750	\$375	reviewing production for latest FSP class list	Class Outreach and Contact
7/8/2024	Rachel Steyer	0.4	\$750	\$300	reviewing thread of communications btwn MTJ and OC re proposed schedule of expert depos, authorities provided by OC for meet and confer	Communications With Opposing Counsel
7/8/2024	Rachel Steyer	0.2	\$750	\$150	reviewing thread of correspondence between MTJ and OC re prep and compilation of scooter class list	Communications With Opposing Counsel
7/8/2024	Rachel Steyer	0.2	\$750	\$150	reviewing production for docs pertaining to former Scotts Valley resident	Discovery (Non-Deposition)
7/8/2024	Travis Close	2.2	\$850	\$1,870	Draft memo re: standard for showing cause for second deposition of expert	Case Organization, Planning and Strategy
7/8/2024	Travis Close	0.3	\$850	\$255	Email to GBW re: brookdale's updated task times for 2024	Case Organization, Planning and Strategy
7/8/2024	Travis Close	1.3	\$850	\$1,105	Analysis of new document production re: budget spreadsheets, trainings, and reports for data on contract labor utilized	Case Organization, Planning and Strategy
7/8/2024	Travis Close	0.2	\$850	\$170	Email to LEC re: assignment for new service alignment docs received	Case Organization, Planning and Strategy
7/8/2024	Travis Close	0.3	\$850	\$255	Email to MTJ re: availability of Kailes for deposition in July 2024	Case Organization, Planning and Strategy
7/8/2024	Travis Close	0.7	\$850	\$595	Analysis of updated BEST standards for info on new transportation standards & interpretive guidelines	Case Organization, Planning and Strategy
7/8/2024	Travis Close	0.7	\$850	\$595	Review and analyze updated brookdale norms spreadsheets recently produced for info on advanced customizations for plaintiffs' facilities	Case Organization, Planning and Strategy
7/9/2024	Mark Johnson	1.0	\$1,150	\$1,150	partial review of latest batch of ESI from Ds, including FSP related docs	Discovery (Non-Deposition)
7/9/2024	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW re issues raised in Bertino's letter re class list, other discovery issues.	Discovery (Non-Deposition)
7/9/2024	Mark Johnson	0.4	\$1,150	\$460	review and analysis of 6 page ltr from OC Bertino re class list and discovery issues	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/9/2024	Rachel Steyer	6.3	\$750	\$4,725	reviewing latest document production, updating master index spreadsheet	Discovery (Non-Deposition)
7/9/2024	Rachel Steyer	0.3	\$750	\$225	reviewing letter from OC re outstanding discovery/production matters	Discovery (Non-Deposition)
7/9/2024	Travis Close	0.8	\$850	\$680	Review and analyze plaintiffs' reply iso motion for permanent injunctive relief & supporting declaration and exhibits	Case Organization, Planning and Strategy
7/9/2024	Travis Close	1.6	\$850	\$1,360	Review and analyze testimony of Rubin re: benchmarks and compliance thereto	Case Organization, Planning and Strategy
7/9/2024	Travis Close	2.3	\$850	\$1,955	Draft memo of Kelly Rubin's ESI re: compliance with service alignment benchmarks	Case Organization, Planning and Strategy
7/9/2024	Travis Close	1.7	\$850	\$1,445	Review and analyze updated budget spreadsheets & presentations for info on allocation of caregiver hours by department	Case Organization, Planning and Strategy
7/9/2024	Travis Close	0.3	\$850	\$255	Email to LEC re: third party-produced records sorting assignment	Case Organization, Planning and Strategy
7/9/2024	Travis Close	0.8	\$850	\$680	Review and analyze records by City of San Ramon for info on fire sprinkler systems at Brookdale San Ramon	Case Organization, Planning and Strategy
7/10/2024	Guy Wallace	0.6	\$1,350	\$810	review and analysis of emails from MTJ; RLS re Defendants' recent production of ESI re transportation claims; issue re class list; com's with MTJ re same	Discovery (Non-Deposition)
7/10/2024	Mark Johnson	0.2	\$1,150	\$230	email exchanges w/ OC Rutner re Flores depo, Omole depo, Omole representation, depo subpoena.	Communications With Opposing Counsel
7/10/2024	Mark Johnson	0.5	\$1,150	\$575	draft email to OC re production of FSP class list, intent to communicate with class members w/o regard to ECF 152 stip and order; D failure to produce contact info for authorized representatives; com w/ GBW re same.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/10/2024	Mark Johnson	0.2	\$1,150	\$230	email exchanges w/ TCC, RLS re review of meet and confer history on 56 categories of documents and summary of same; review template for capturing information.	Discovery (Non-Deposition)
7/10/2024	Mark Johnson	0.2	\$1,150	\$230	review RLS index of recently produced docs purporting to be ESI re FSP; com w/ COC re same	Discovery (Non-Deposition)
7/10/2024	Mark Johnson	0.2	\$1,150	\$230	review email and metadata from RLS and RAB re recently produced docs concering contract labor, email to BU re same.	Discovery (Non-Deposition)
7/10/2024	Mark Johnson	2.9	\$1,150	\$3,335	review prior correspondence, doc requests re multiple discovery issues; draft letter to OC responding to letter of 7/9 re discovery status and demands.	Experts (Including Retention)
7/10/2024	Mark Johnson	0.3	\$1,150	\$345	call and emails w/ B Umpierre re additional documents that may be relevant to Flores deposition	Experts (Including Retention)
7/10/2024	Rachel Steyer	0.5	\$750	\$375	attempting class outreach, leaving VMs, updating and reviewing notes in spreadsheet	Class Outreach and Contact
7/10/2024	Rachel Steyer	0.9	\$750	\$675	call with POA for current resident, discussed case and transportation issues, agreed to follow up later	Class Outreach and Contact
7/10/2024	Rachel Steyer	0.2	\$750	\$150	draft email to POA of current resident providing residency agreement and class mailer	Class Outreach and Contact
7/10/2024	Rachel Steyer	3.5	\$750	\$2,625	ongoing review of latest production, updating master index spreadsheet	Discovery (Non-Deposition)
7/10/2024	Rachel Steyer	0.3	\$750	\$225	reviewing productions for examples of irrelevant docs	Discovery (Non-Deposition)
7/10/2024	Rachel Steyer	0.3	\$750	\$225	reviewing and updating chart prepared by TCC re supplementation of 56 categories	Discovery (Non-Deposition)
7/10/2024	Rachel Steyer	0.2	\$750	\$150	review of metadata export, updating master discovery index	Discovery (Non-Deposition)
7/10/2024	Travis Close	1.7	\$850	\$1,445	Review and analyze history of communications between parties re: supplementation of discovery and the 56 categories	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/10/2024	Travis Close	1.4	\$850	\$1,190	Prepare chart for assignment re: analysis of production of documents from the 56 categories of supplementation	Case Organization, Planning and Strategy
7/10/2024	Travis Close	0.2	\$850	\$170	Review and analyze def's letter of July 9 re: supplementation and discovery issues	Case Organization, Planning and Strategy
7/10/2024	Travis Close	1.5	\$850	\$1,275	Review and analyze defendants' recent production re FSP docs & filter out irrelevant files and duplicates	Case Organization, Planning and Strategy
7/10/2024	Travis Close	0.2	\$850	\$170	Emails to MTJ re: assignment for analysis of the 56 categories	Case Organization, Planning and Strategy
7/10/2024	Travis Close	0.9	\$850	\$765	Review and analyze unique versions of the complete policy & procedure manuals produced, and what is still missing	Case Organization, Planning and Strategy
7/10/2024	Travis Close	0.6	\$850	\$510	Review and analyze sufficiency of supplementation re: job descriptions of facility-level staff	Discovery (Non-Deposition)
7/10/2024	Travis Close	0.4	\$850	\$340	Review and analyze sufficiency of supplementation re: policy for development and revisions of policies	Discovery (Non-Deposition)
7/10/2024	Travis Close	0.4	\$850	\$340	Review and analyze emails showing updated FSP being implemented in the JJ Keller system	Discovery (Non-Deposition)
7/11/2024	Mark Johnson	0.4	\$1,150	\$460	draft agenda / task list for team mtg	Case Organization, Planning and Strategy
7/11/2024	Mark Johnson	0.6	\$1,150	\$690	calls (x2) w GBW re expert depo staffing, trial prep, motions to compel, agenda for team mtg, draft ltr re discovery status	Case Organization, Planning and Strategy
7/11/2024	Mark Johnson	0.7	\$1,150	\$805	review email from BU, summary of potentially relevant docs for Flores depo; review selected docs re acuity norms, task times, benchmark calculations, draft email response to BU re same	Depositions
7/11/2024	Mark Johnson	0.8	\$1,150	\$920	review contract labor invoices produced by Defendants	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/11/2024	Mark Johnson	2.2	\$1,150	\$2,530	work on and finish first draft of letter re discovery status responsive to D 7/9 letter; email to COC re same.	Discovery (Non-Deposition)
7/11/2024	Mark Johnson	0.2	\$1,150	\$230	coms w/ B Umpierre, RLS re documents to be pulled for Flores depo prep	Experts (Including Retention)
7/11/2024	Rachel Steyer	0.2	\$750	\$150	call with son of current resident, agreed to follow up in a few weeks	Class Outreach and Contact
7/11/2024	Rachel Steyer	1.0	\$750	\$750	attempted class outreach, leaving VMs, updating and reviewing notes in spreadsheet	Class Outreach and Contact
7/11/2024	Rachel Steyer	0.3	\$750	\$225	received call back from daughter of current resident, discussed case, open to follow up down the road	Class Outreach and Contact
7/11/2024	Rachel Steyer	0.3	\$750	\$225	reviewing and editing draft MTJ letter to OC re discovery matters	Communications With Opposing Counsel
7/11/2024	Rachel Steyer	1.2	\$750	\$900	review of production and updating TCC chart	Discovery (Non-Deposition)
7/11/2024	Rachel Steyer	1.4	\$750	\$1,050	reviewing latest production and updating spreadsheet index	Discovery (Non-Deposition)
7/11/2024	Travis Close	0.6	\$850	\$510	Review and analyze Brookdale's 10-k filings over the years to determine trend for number of facilities and residents	Case Organization, Planning and Strategy
7/11/2024	Travis Close	0.5	\$850	\$425	Review and analyze recent productions of DDO Playbook & DDO VPA Training sessions	Case Organization, Planning and Strategy
7/11/2024	Travis Close	0.6	\$850	\$510	Review and analyze recent productions of Manuals & training materials for Health & Wellness Directors	Case Organization, Planning and Strategy
7/11/2024	Travis Close	0.8	\$850	\$680	Review and analyze updated versions of orientations produced for executive directors & health care administrators	Case Organization, Planning and Strategy
7/11/2024	Travis Close	0.7	\$850	\$595	Review and analyze updated versions of Associate Foundations orientation & training materials produced	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/11/2024	Travis Close	0.4	\$850	\$340	Review and analyze updated community action plans for success (CAPs) produced for info re: expense management	Case Organization, Planning and Strategy
7/11/2024	Travis Close	1.2	\$850	\$1,020	Review and analyze updated productions of budget training materials for EDs/HCAs	Case Organization, Planning and Strategy
7/11/2024	Travis Close	0.8	\$850	\$680	Review, analyze, and organize updated 12-month budget reports and income statements produced for Scotts Valley and San Ramon facilities	Case Organization, Planning and Strategy
7/11/2024	Travis Close	0.5	\$850	\$425	Analysis of updated budget guidance tools for service alignment produced since 2018	Case Organization, Planning and Strategy
7/11/2024	Travis Close	0.5	\$850	\$425	Review and analyze budget adjustment request forms produced for San Ramon and Scotts Valley facilities	Case Organization, Planning and Strategy
7/11/2024	Travis Close	0.6	\$850	\$510	Review and analyze updated versions of the RVP/DDO budget process presentation & other financial operations trainings produced since 2021	Case Organization, Planning and Strategy
7/11/2024	Travis Close	0.6	\$850	\$510	Analysis of updated trainings re: finances and financial management	Discovery (Non-Deposition)
7/12/2024	Guy Wallace	0.5	\$1,350	\$675	team zoom with GG; JY; AS; BU; MTJ; TCC re deposition schedule; issues re production of FSP class list	Depositions
7/12/2024	Guy Wallace	1.6	\$1,350	\$2,160	review and analysis of Defendants' letter of 7/9 re various discovery issues; review and analysis of draft response thereto; com's with MTJ re same	Discovery (Non-Deposition)
7/12/2024	Rachel Steyer	0.9	\$750	\$675	weekly zoom with RBGG, BSU, GBW, MTJ, TCC re ongoing tasks and assignments	Case Organization, Planning and Strategy
7/12/2024	Rachel Steyer	0.3	\$750	\$225	attempted class outreach, updating notes in spreadsheet, leaving VMs	Class Outreach and Contact
7/12/2024	Rachel Steyer	0.2	\$750	\$150	received call back from son of current resident, discussed case, requested follow up call next week	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/12/2024	Rachel Steyer	2.5	\$750	\$1,875	reviewing production for any documents pertaining to FSP class list residents	Discovery (Non-Deposition)
7/12/2024	Travis Close	0.5	\$850	\$425	Review and analyze newer versions of "focus action" presentations in recent productions	Case Organization, Planning and Strategy
7/12/2024	Travis Close	0.8	\$850	\$680	Review, analyze, and catalogue records of communications between facilities and DSS employees re: complaint resolution	Case Organization, Planning and Strategy
7/12/2024	Travis Close	0.7	\$850	\$595	Review and analyze recent productions of resident council meeting minutes for the six plaintiffs' facilities	Case Organization, Planning and Strategy
7/12/2024	Travis Close	0.7	\$850	\$595	Revisions to letter by MTJ re: remaining discovery issues	Case Organization, Planning and Strategy
7/12/2024	Travis Close	0.9	\$850	\$765	Meeting with GBW, MTJ, RLS, and co-counsel re: class list discovery, joint letter brief & discovery letter, motions for summary judgement, deposition	Case Organization, Planning and Strategy
7/12/2024	Travis Close	0.5	\$850	\$425	Further edits to omnibus discovery letter for finalization this afternoon	Case Organization, Planning and Strategy
7/12/2024	Travis Close	0.7	\$850	\$595	Review and analyze updated resident council meeting minutes recently produced by Defendants	Case Organization, Planning and Strategy
7/12/2024	Travis Close	0.3	\$850	\$255	Email to KS re: previous records of notice of deposition, subpoena, & declaration for Omole deposition	Case Organization, Planning and Strategy
7/12/2024	Travis Close	0.8	\$850	\$680	Analysis of updated BEST data recently produced for the six facilities post-2019	Case Organization, Planning and Strategy
7/12/2024	Travis Close	0.5	\$850	\$425	Review and analyze recent corrective actions produced for the six facilities related to staffing issues	Case Organization, Planning and Strategy
7/12/2024	Travis Close	1.4	\$850	\$1,190	Draft memo re: deficiencies from defendants' latest production with respect to the 56 categories	Case Organization, Planning and Strategy
7/15/2024	Guy Wallace	0.5	\$1,350	\$675	com's with JGT; BU re preparation for deposition of Dr. Flores	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/15/2024	Guy Wallace	3.6	\$1,350	\$4,860	review and analysis of Dr. Flores opening and rebuttal reports; report of Josh Allen	Depositions
7/15/2024	Guy Wallace	0.7	\$1,350	\$945	review and analysis of letter re compliance with District Court's discovery Order of April 25, 2024	Discovery (Non-Deposition)
7/15/2024	Guy Wallace	0.2	\$1,350	\$270	com's with RLS re class outreach	Discovery (Non-Deposition)
7/15/2024	Rachel Steyer	2.1	\$750	\$1,575	reviewing FSP class list with earlier list for do not contact requests	Class Outreach and Contact
7/15/2024	Rachel Steyer	0.3	\$750	\$225	calls (one .1 and one .2) with family member of current resident, discussed setting up further comms with resident	Class Outreach and Contact
7/15/2024	Rachel Steyer	0.2	\$750	\$150	spoke w/daughter of current resident, discussed case and contacting mother	Class Outreach and Contact
7/15/2024	Rachel Steyer	0.2	\$750	\$150	call with GBW to review class outreach	Class Outreach and Contact
7/15/2024	Rachel Steyer	0.2	\$750	\$150	call with resident, discussed case	Class Outreach and Contact
7/15/2024	Rachel Steyer	1.5	\$750	\$1,125	reviewing and gathering docs for MTJ for Omole depo	Depositions
7/15/2024	Rachel Steyer	0.5	\$750	\$375	reviewing latest production, updating spreadsheet	Discovery (Non-Deposition)
7/15/2024	Rachel Steyer	0.3	\$750	\$225	reviewing and editing MTJ draft letter brief re outstanding discovery issues	Discovery (Non-Deposition)
7/15/2024	Rachel Steyer	0.2	\$750	\$150	searching production for FSP class member info	Discovery (Non-Deposition)
7/15/2024	Rachel Steyer	0.2	\$750	\$150	reviewing updated draft of letter from MTJ	Discovery (Non-Deposition)
7/15/2024	Rachel Steyer	1.2	\$750	\$900	gathering and reviewing photos of named plaintiffs for BSU	Discovery (Non-Deposition)
7/15/2024	Travis Close	0.2	\$850	\$170	Email to DJC re: materials for reviewing before date of deposition	Case Organization, Planning and Strategy
7/15/2024	Travis Close	1.4	\$850	\$1,190	Review and analyze recent community business plans and related financial analyses produced for the six plaintiffs' facilities	Case Organization, Planning and Strategy
7/15/2024	Travis Close	1.5	\$850	\$1,275	Review, analyze, and organize spend down reports produced for the six plaintiffs' facilities	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/15/2024	Travis Close	0.8	\$850	\$680	Review and analyze community-specific service alignment customization data produced for San Ramon & Scotts Valley facilities	Case Organization, Planning and Strategy
7/15/2024	Travis Close	1.7	\$850	\$1,445	Review and analyze plans of operation produced by Defendants and by third parties for the six plaintiffs' facilities	Case Organization, Planning and Strategy
7/15/2024	Travis Close	0.4	\$850	\$340	Research statutory & regulatory requirements for plans of operation of assisted living facilities in California	Case Organization, Planning and Strategy
7/15/2024	Travis Close	0.7	\$850	\$595	Research updated service alignment presentations & data produced for the San Ramon and Scotts Valley facilities	Case Organization, Planning and Strategy
7/15/2024	Travis Close	0.7	\$850	\$595	Review and analyze date ranges of issue registers produced for the six plaintiffs' facilities and for transportation-related complaints	Case Organization, Planning and Strategy
7/15/2024	Travis Close	0.2	\$850	\$170	Email to MTJ re: analysis of the status of production of 56 categories of documents	Case Organization, Planning and Strategy
7/15/2024	Travis Close	0.3	\$850	\$255	Email to MTJ re: which items to compel from the 56 categories	Case Organization, Planning and Strategy
7/16/2024	Guy Wallace	2.6	\$1,350	\$3,510	zoom with Dr. Flores; JGT; BU; MTJ re deposition preparation	Depositions
7/16/2024	Guy Wallace	0.8	\$1,350	\$1,080	revise and edit draft MTC letter brief re Thirteenth and Fourteenth Sets of RFPs; com's with MTJ re same and other discovery issues and preparation for meet and confer with Defendants re same	Discovery (Non-Deposition)
7/16/2024	Guy Wallace	2.7	\$1,350	\$3,645	review and analysis of Josh Allen report; Rebuttal Report of Dr. Flores; preparation for deposition of Dr. Flores	Experts (Including Retention)
7/16/2024	Mark Johnson	2.3	\$1,150	\$2,645	participate in zoom depo prep call for Dr. Flores	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/16/2024	Mark Johnson	0.7	\$1,150	\$805	review exhibits from GBW dec iso class cert mtn 2 for selected exhibits to share with expert Flores for deposition prep; transmit same; email to colleagues re transmission of additional exhibits.	Depositions
7/16/2024	Mark Johnson	0.5	\$1,150	\$575	review and analyze D's new letter re discovery disputes; email to TCC re input on same and review response (.1)	Discovery (Non-Deposition)
7/16/2024	Mark Johnson	0.3	\$1,150	\$345	emails to OC Rutner re scheduling meet and confer on discovery disputes, expert depo dates, Omole depo subpoena and proposed motion to quash.	Discovery (Non-Deposition)
7/16/2024	Mark Johnson	0.5	\$1,150	\$575	work on outline of issues and strategy for meet and confer re discovery, review TCC memo / potential attachment for discovery ltr	Discovery (Non-Deposition)
7/16/2024	Mark Johnson	1.5	\$1,150	\$1,725	work on and finalized opening of letter brief re 13th and 14th set of document requests.	Other Motions
7/16/2024	Rachel Steyer	1.1	\$750	\$825	attempted class outreach, leaving VMs, updating notes in spreadsheet	Class Outreach and Contact
7/16/2024	Rachel Steyer	0.2	\$750	\$150	spoke with daughter of former resident, discussed case and noted issues	Class Outreach and Contact
7/16/2024	Rachel Steyer	0.7	\$750	\$525	call with granddaughter of current resident, discussed case and issues	Class Outreach and Contact
7/16/2024	Rachel Steyer	0.2	\$750	\$150	call with son of former resident, discussed case, only issue was with food service	Class Outreach and Contact
7/16/2024	Rachel Steyer	0.6	\$750	\$450	call with representative for resident, discussed case and answered questions	Class Outreach and Contact
7/16/2024	Rachel Steyer	0.3	\$750	\$225	call with daughter of current resident, discussed case, answered questions	Class Outreach and Contact
7/16/2024	Rachel Steyer	0.3	\$750	\$225	reviewing letter from OC re outstanding discovery issues	Communications With Opposing Counsel

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/16/2024	Rachel Steyer	0.4	\$750	\$300	reviewing latest production and updating master discovery index	Discovery (Non-Deposition)
7/16/2024	Rachel Steyer	0.3	\$750	\$225	reviewing/editing draft MTJ letter brief re 13th and 14th set of RFPs	Discovery (Non-Deposition)
7/16/2024	Travis Close	0.3	\$850	\$255	Email to DJC (expert) re: preparation for deposition	Case Organization, Planning and Strategy
7/16/2024	Travis Close	0.5	\$850	\$425	Analysis of sufficiency of performance reviews produced for the six plaintiffs' facilities	Case Organization, Planning and Strategy
7/16/2024	Travis Close	0.8	\$850	\$680	Review and analyze sufficiency of production of complaint investigation reports for the scotts valley and san ramon facilities	Case Organization, Planning and Strategy
7/16/2024	Travis Close	0.5	\$850	\$425	Analyze time periods covered of our current production of facility scores for BEST audits	Case Organization, Planning and Strategy
7/16/2024	Travis Close	0.6	\$850	\$510	Review and analyze billings, invoices, payment records for plaintiffs Stiner and Jestrabek-Hart that have been recently supplemented by Brookdale	Case Organization, Planning and Strategy
7/16/2024	Travis Close	0.5	\$850	\$425	Analysis of data on maximum daily staffing reports for the six plaintiffs' facilities	Case Organization, Planning and Strategy
7/16/2024	Travis Close	1.9	\$850	\$1,615	Draft chart of categories for supplementation that remain deficient from the 56 follow defendants' latest productions, to become Exhibit C to motion to compel	Case Organization, Planning and Strategy
7/16/2024	Travis Close	0.7	\$850	\$595	Prep for phone call with Doug Cross today re: materials to review before deposition	Case Organization, Planning and Strategy
7/16/2024	Travis Close	1.8	\$850	\$1,530	Call with Doug Cross re: trial preparation, new FSP docs production, depo prep and scheduling	Case Organization, Planning and Strategy
7/16/2024	Travis Close	0.2	\$850	\$170	Email to MTJ re: exhibit analysis of 56 categories	Discovery (Non-Deposition)
7/16/2024	Travis Close	0.7	\$850	\$595	Review and analyze recent production of corrective actions related to SA or staffing goals	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/16/2024	Travis Close	0.6	\$850	\$510	Analysis of dates of presentations recently produced re: service alignment to determine sufficiency of production	Discovery (Non-Deposition)
7/16/2024	Travis Close	0.7	\$850	\$595	Review and analyze versions of maintenance manual and other guides related to asset management supplemented by Brookdale	Discovery (Non-Deposition)
7/17/2024	Guy Wallace	3.7	\$1,350	\$4,995	preparation of notes for Dr. Flores re deposition preparation	Depositions
7/17/2024	Guy Wallace	1.2	\$1,350	\$1,620	review and analysis of 7/16 letter from Defendants re discovery issues; review and analysis of emails from MTJ; TCC; RLS re same	Depositions
7/17/2024	Mark Johnson	0.5	\$1,150	\$575	review 5 pages of GBW notes for Flores depo prep; draft additional comments and share by email w/ COC	Depositions
7/17/2024	Mark Johnson	1.5	\$1,150	\$1,725	research scope and type of expert discovery allowed, to address Ds' argument that it is only disclosures and depositions.	Discovery (Non-Deposition)
7/17/2024	Mark Johnson	1.1	\$1,150	\$1,265	video conference w/ Close and Steyer re 56 categories of document production to be reviewed in meet and confer w/ OC	Discovery (Non-Deposition)
7/17/2024	Mark Johnson	2.7	\$1,150	\$3,105	review TCC charts re Ds production of docs from 56 categories; add notes, comments re questions and approach to meet and confer w/ OC, begin drafting proposed communication with Ds re same.	Discovery (Non-Deposition)
7/17/2024	Mark Johnson	0.1	\$1,150	\$115	coms w/ B Umpierre, J Thornton re Schroyer production with supplemental expert report, docs for Flores depo prep.	Experts (Including Retention)
7/17/2024	Rachel Steyer	2.8	\$750	\$2,100	attempted class outreach, left VMs, updated and reviewing notes in spreadsheet	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/17/2024	Rachel Steyer	0.2	\$750	\$150	call with son of current resident, discussed case and next steps	Class Outreach and Contact
7/17/2024	Rachel Steyer	0.2	\$750	\$150	spoke w/son of current resident, issues seem to be confined to basic services	Class Outreach and Contact
7/17/2024	Rachel Steyer	0.2	\$750	\$150	call with family member of resident, discussed case, scheduled intake call	Class Outreach and Contact
7/17/2024	Rachel Steyer	0.2	\$750	\$150	reviewing AS notes from meet and confer	Discovery (Non-Deposition)
7/17/2024	Rachel Steyer	1.1	\$750	\$825	teams call with MTJ and TCC to review outstanding discovery supplementation categories in advance of meet and confer	Discovery (Non-Deposition)
7/17/2024	Rachel Steyer	0.2	\$750	\$150	response to MTJ, GBW, TCC re outstanding categories/info for meet and confer	Discovery (Non-Deposition)
7/17/2024	Travis Close	0.2	\$850	\$170	Email to MTJ, RLS, GBW re: scheduling time for discovery meeting	Case Organization, Planning and Strategy
7/17/2024	Travis Close	0.2	\$850	\$170	Email to Doug cross re: dates from court's latest scheduling order	Case Organization, Planning and Strategy
7/17/2024	Travis Close	0.2	\$850	\$170	Review and analyze supplemental rule 26 report from dale schroyer	Case Organization, Planning and Strategy
7/17/2024	Travis Close	0.5	\$850	\$425	Review and analyze notes, records of communication for notes of 5-13-24 meet and confer	Case Organization, Planning and Strategy
7/17/2024	Travis Close	0.3	\$850	\$255	Email to MTJ re: representations made at 5-13-24 meeting re supplementation of discovery	Case Organization, Planning and Strategy
7/17/2024	Travis Close	1.2	\$850	\$1,020	Meeting with MTJ, RLS re: sufficiency of production as to the 56 categories	Case Organization, Planning and Strategy
7/17/2024	Travis Close	0.3	\$850	\$255	Finalize notes after today's meeting and send to team	Case Organization, Planning and Strategy
7/17/2024	Travis Close	0.7	\$850	\$595	Review and analyze sufficiency of production of issue registers for the six plaintiffs' facilities	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/17/2024	Travis Close	0.2	\$850	\$170	Review and analyze notes of 5-13-24 meet and confer to determine whether 56 categories were mentioned	Case Organization, Planning and Strategy
7/18/2024	Mark Johnson	0.4	\$1,150	\$460	review email from RLS re call w/ counsel for Omole and email passed on from his counsel (.1); call w/ Omole counsel (.2), email w/ /COC re same and strategy for Omole deposition, proposed motion to quash. (.1)	Depositions
7/18/2024	Mark Johnson	0.8	\$1,150	\$920	draft, revise proposed correspondence to OC re position and expectations for meet and confer session re 56 documents; email to COC re same	Discovery (Non-Deposition)
7/18/2024	Mark Johnson	0.5	\$1,150	\$575	calls (x2) w/ GBW re discovery disputes and strategy for meet and confer session.	Discovery (Non-Deposition)
7/18/2024	Mark Johnson	0.1	\$1,150	\$115	revise and send email to OC re discovery dispute and meet and confer session.	Discovery (Non-Deposition)
7/18/2024	Rachel Steyer	0.3	\$750	\$225	double checking names from class list re do not contact	Class Outreach and Contact
7/18/2024	Rachel Steyer	0.4	\$750	\$300	attempted class outreach, leaving VMs, reviewing and updating notes in spreadsheet	Class Outreach and Contact
7/18/2024	Rachel Steyer	2.1	\$750	\$1,575	reviewing FSP class names/responsible parties in production	Class Outreach and Contact
7/18/2024	Rachel Steyer	0.2	\$750	\$150	reviewing MTJ draft email to OC in advance of meet and confer	Communications With Opposing Counsel
7/18/2024	Rachel Steyer	0.2	\$750	\$150	call with Akindele Omole third party counsel re status of depo, meeting and conferring, motion to quash/reconsideration	Depositions
7/18/2024	Rachel Steyer	0.2	\$750	\$150	response to GBW re total pages in production post April	Discovery (Non-Deposition)
7/18/2024	Rachel Steyer	2.4	\$750	\$1,800	reviewing and udpating master discovery index	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/18/2024	Rachel Steyer	0.4	\$750	\$300	reviewing/double checking named plaintiff resident files	Discovery (Non-Deposition)
7/18/2024	Rachel Steyer	0.2	\$750	\$150	reviewing and double checking internal spreadsheet re categories of supplementation	Discovery (Non-Deposition)
7/18/2024	Rachel Steyer	0.2	\$750	\$150	call with RAB to review questions about outstanding production overwrite/confirming docs	Discovery (Non-Deposition)
7/18/2024	Travis Close	1.2	\$850	\$1,020	Analysis of categories of documents from the 56 required of supplementation to determine subset to move to compel	Case Organization, Planning and Strategy
7/18/2024	Travis Close	0.3	\$850	\$255	Email to LEC re: new assignment regarding SEC information and data entry on brookdale's financials	Case Organization, Planning and Strategy
7/19/2024	Guy Wallace	0.9	\$1,350	\$1,215	revise and edit class outreach script re FSP class	Class Certification
7/19/2024	Guy Wallace	1.1	\$1,350	\$1,485	com's with BBK; MTJ; RLS re results of meet and confer with Defendants re disputed discovery items; schedule; response thereto	Depositions
7/19/2024	Guy Wallace	0.2	\$1,350	\$270	com's with BU; JGT re results of Flores deposition	Depositions
7/19/2024	Guy Wallace	1.4	\$1,350	\$1,890	review and analysis of Defendants' 7/16 letter re discovery and case schedule; preparation of questions and notes re same; com's with MTJ; TCC; RLS re same	Discovery (Non-Deposition)
7/19/2024	Guy Wallace	1.1	\$1,350	\$1,485	team zoom with GG; JY; BBK; AS; BU; MTJ; RLS re expert discovery; motions to compel; trial structure	Trial and Pretrial Preparation
7/19/2024	Mark Johnson	0.7	\$1,150	\$805	draft agenda, discussion points and action items for team mtg; revise pre-trial schedule and expert depo schedule chart and circulate same to COC	Case Organization, Planning and Strategy
7/19/2024	Mark Johnson	0.9	\$1,150	\$1,035	video conference w/ COC Wallace, Grunfeld, Bien-Kahn, Yelin, Steyer, Umpierre re expert depo schedule, outstanding discovery, motion to compel, class outreach, D demand for communications with residents.	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/19/2024	Mark Johnson	0.3	\$1,150	\$345	email coms/ w GBW and RLS re mtn to compel, issues re 56 categories of documents, class outreach	Discovery (Non-Deposition)
7/19/2024	Mark Johnson	1.5	\$1,150	\$1,725	Video meet and confer w/ Opposing counsel re multiple discovery issues and expert depositions	Discovery (Non-Deposition)
7/19/2024	Mark Johnson	0.7	\$1,150	\$805	follow up call w/ COC Wallace, Bien-Kahn, Steyer, Spiegel after meet and confer to brief others and strategize on next steps, legal issues	Discovery (Non-Deposition)
7/19/2024	Rachel Steyer	0.9	\$750	\$675	weekly zoom with RBGG, MTJ, GBW, BSU to review ongoing tasks and assignments	Case Organization, Planning and Strategy
7/19/2024	Rachel Steyer	0.2	\$750	\$150	revising outreach script for FSP class list	Class Outreach and Contact
7/19/2024	Rachel Steyer	0.9	\$750	\$675	attempted class outreach, left VMs, updating and reviewing notes in spreadsheet	Class Outreach and Contact
7/19/2024	Rachel Steyer	0.3	\$750	\$225	reviewing and editing/incorporating MTJ edits to draft FSP outreach script	Class Outreach and Contact
7/19/2024	Rachel Steyer	0.2	\$750	\$150	reviewing GBW edits to draft FSP outreach script, incorporating edits and additions	Class Outreach and Contact
7/19/2024	Rachel Steyer	0.4	\$750	\$300	comments to GBW, MTJ, TCC, BSU re status of defendants production and discovery	Discovery (Non-Deposition)
7/19/2024	Rachel Steyer	0.3	\$750	\$225	reviewing documents/production in connection with MTJ doc requests for Omole depo	Discovery (Non-Deposition)
7/19/2024	Rachel Steyer	1.5	\$750	\$1,125	attended meet and confer with BBK, MTJ, and opposing counsel re outstanding discovery items	Discovery (Non-Deposition)
7/19/2024	Rachel Steyer	0.6	\$750	\$450	follow up zoom with GBW, MTJ, AS, and BBK following meet and confer	Discovery (Non-Deposition)
7/19/2024	Rachel Steyer	0.3	\$750	\$225	reviewing earlier RBGG memo re putative class member outreach	Misc. Research
7/22/2024	Guy Wallace	0.7	\$1,350	\$945	review and analysis of Order re motion for access subclasses	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/22/2024	Guy Wallace	2.3	\$1,350	\$3,105	analysis of Order re certification of subclasses and potential certification of issues for appeal; com's with JRA; MTJ; JAU; RLS re same	Class Certification
7/22/2024	Guy Wallace	1.3	\$1,350	\$1,755	analysis of Plaintiffs' requests for 56 categories of documents; com's with MTJ; RLS re same and status of Defendants' productions and follow up and motion to compel re same	Discovery (Non-Deposition)
7/22/2024	Jennifer Bybee	0.6	\$925	\$555	Review Court's Order re class certification	Class Certification
7/22/2024	Mark Johnson	1.2	\$1,150	\$1,380	review and analyze class cert decision on subclasses.	Class Certification
7/22/2024	Mark Johnson	4.5	\$1,150	\$5,175	work on opening section of ltr brief re access discovery - contention rogs and 14th set of RFPs	Other Motions
7/22/2024	Rachel Steyer	0.8	\$750	\$600	reviewing court's decision re motion for certification of subclasses	Class Certification
7/22/2024	Rachel Steyer	0.3	\$750	\$225	call with Wendy DeMello to provide update re subclasses decision, status moving forward	Class Certification
7/22/2024	Rachel Steyer	0.2	\$750	\$150	reviewing and updating notes in spreadsheet re class outreach	Class Outreach and Contact
7/22/2024	Rachel Steyer	2.3	\$750	\$1,725	reviewing/comparing FSP names from earlier versions to determine cross checking	Class Outreach and Contact
7/22/2024	Rachel Steyer	0.2	\$750	\$150	response to MTJ, GBW, LEC re locating relevant contract labor invoices for Omole depo prep	Depositions
7/22/2024	Rachel Steyer	1.5	\$750	\$1,125	gathering and downloading additional contract labor invoices for Omole depo prep	Depositions
7/22/2024	Rachel Steyer	0.5	\$750	\$375	reviewing production and comparing to docs cited by defendants in meet and confer	Discovery (Non-Deposition)
7/22/2024	Rachel Steyer	0.4	\$750	\$300	call with GBW to review discovery status	Discovery (Non-Deposition)
7/22/2024	Rachel Steyer	0.2	\$750	\$150	reviewing authorities provided by OC re expert vs. fact discovery	Misc. Research
7/23/2024	Guy Wallace	0.8	\$1,350	\$1,080	com's with JRA re potential appeal of order re (b)(3) damages subclasses	Appeal

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/23/2024	Guy Wallace	1.1	\$1,350	\$1,485	com's with MTJ; JAU re potential appeal of denial of damages subclasses	Appeal
7/23/2024	Guy Wallace	0.8	\$1,350	\$1,080	com's with GG; JY; BBK; AS; BU; MTJ; JAU; RLS re Order re subclasses, potential certification of issue(s) for appeal, discovery	Case Organization, Planning and Strategy
7/23/2024	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of Order re subclasses; analysis of potential appeal	Class Certification
7/23/2024	Guy Wallace	0.4	\$1,350	\$540	com's with JY; MTJ; RLS re Defendants' efforts to obtain current medical records re Algarme; review and analysis of Rutner; Bertino emails re same	Class Certification
7/23/2024	Guy Wallace	0.5	\$1,350	\$675	review and analysis of draft MTC's re class lists; benchmark formula; Defendants' responses re access barriers; com's with MTJ re same	Other Motions
7/23/2024	Jennifer Bybee	0.1	\$925	\$93	Send GBW D's brief re certifying interlocutory appeal	Appeal
7/23/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re appealing class cert	Appeal
7/23/2024	Jennifer Bybee	0.8	\$925	\$740	Zoom meeting with co-counsel re appealing 9th circuit's class cert order	Class Certification
7/23/2024	Jennifer Bybee	0.4	\$925	\$370	Com's with GBW re appeal of class cert order	Other Motions
7/23/2024	Jennifer Bybee	0.2	\$925	\$185	Look up timing for filing motion to certify interlocutory appeal	Other Motions
7/23/2024	Mark Johnson	0.7	\$1,150	\$805	team zoom call w/ Wallace, Grunfeld, Yelin, Bien-Kahn, Umpierre, Steyer, Spiegel, Bybee, Edmundson re potential mtn to certify class damages issue for appeal.	Case Organization, Planning and Strategy
7/23/2024	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW re class lists and identification of additional potential Plaintiff for Brookhurst, D's strategy for trying to dismiss her injunctive relief claims on standing grounds.	Case Organization, Planning and Strategy
7/23/2024	Mark Johnson	0.2	\$1,150	\$230	email COC re expert depo schedule; review email correspondence for same.	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/23/2024	Mark Johnson	0.8	\$1,150	\$920	coms w/ J Yellin re Mastin expert reports and Plaintiff Algarne's former residence; review Amy Xu notes of inspections; review and comparison of Mastin barrier report	Experts (Including Retention)
7/23/2024	Mark Johnson	0.1	\$1,150	\$115	email to J Mastin re Brookhurst expert report and scope of inspection.	Experts (Including Retention)
7/23/2024	Mark Johnson	0.2	\$1,150	\$230	review prior correspondence for infor re transmission of expert report supporting data; email to RAB and JAU re location of Mastin/Waters photos and notes.	Experts (Including Retention)
7/23/2024	Mark Johnson	0.2	\$1,150	\$230	call and email June Kailes re changes in availability and proposed dates for deposition.	Experts (Including Retention)
7/23/2024	Mark Johnson	0.1	\$1,150	\$115	follow up email exchange w/ RAB re Mastin / Waters photos, notes	Experts (Including Retention)
7/23/2024	Mark Johnson	0.3	\$1,150	\$345	update expert depo scheduling status and share w/ coc; draft email to Thornton re need for depo dates and coverage.	Experts (Including Retention)
7/23/2024	Mark Johnson	0.2	\$1,150	\$230	review declarations of Rutner, Omole iso mtn to quash	Other Motions
7/23/2024	Mark Johnson	0.1	\$1,150	\$115	draft email to OC re Omole depo rescheduling and mtn to quash	Other Motions
7/23/2024	Mark Johnson	1.9	\$1,150	\$2,185	work on ltr brief iso mtn to compel class list and benchmark formula + follow up discovery opportunity; research for same re cost shifting; email COC re same w/ explanations	Other Motions
7/23/2024	Mark Johnson	2.5	\$1,150	\$2,875	revise, add to, edit mtn to compel ltr briefs on enforcement of class list and source code order of 4/25/24 and supplementation of access contention rogs and 14th RFP; review and incorporate edits from COC; transmit to OC	Other Motions
7/23/2024	Rachel Steyer	0.8	\$750	\$600	call with GBW, MTJ, JUB, BSU, RBGG to review subclass cert order and tasks	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/23/2024	Rachel Steyer	0.7	\$750	\$525	conducted partial intake w/class member responsible party, scheduled follow up call	Class Outreach and Contact
7/23/2024	Rachel Steyer	0.2	\$750	\$150	editing and reviewing notes in class outreach spreadsheet, attempting outreach, leaving VMs	Class Outreach and Contact
7/23/2024	Rachel Steyer	1.8	\$750	\$1,350	completing cross checking of FSP new class list names	Class Outreach and Contact
7/23/2024	Rachel Steyer	0.3	\$750	\$225	conducted further partial intake with Karen Evinsi	Class Outreach and Contact
7/23/2024	Rachel Steyer	0.2	\$750	\$150	call with Wendy DeMello to clarify and review case status	Class Outreach and Contact
7/23/2024	Rachel Steyer	0.2	\$750	\$150	response to JSY, RBGG, GBW, MTJ, TCC, BSU re Brookhurst outreach efforts	Class Outreach and Contact
7/23/2024	Rachel Steyer	0.2	\$750	\$150	reviewing BBK notes from meet and confer	Communications With Opposing Counsel
7/23/2024	Rachel Steyer	0.2	\$750	\$150	reviewing MTJ draft letter brief re expert discovery	Discovery (Non-Deposition)
7/23/2024	Rachel Steyer	0.9	\$750	\$675	reviewing and preparing summary of post April 25 supplementation, specific categories	Discovery (Non-Deposition)
7/23/2024	Rachel Steyer	0.2	\$750	\$150	reviewing MTJ draft letter brief re enforcement of discovery	Other Motions
7/24/2024	Guy Wallace	1.1	\$1,350	\$1,485	legal research and analysis re Olean and the predominance analysis re alleged individualized issues regarding uninjured class members	Appeal
7/24/2024	Guy Wallace	1.5	\$1,350	\$2,025	review and analysis of Order denying certification of (b)(3) subclasses; legal research and analysis re Olean; com's with BU; JAU re same	Appeal
7/24/2024	Guy Wallace	1.2	\$1,350	\$1,620	analysis of legal errors in order denying certification of (b)(3) subclasses; com's with JRA re same	Appeal
7/24/2024	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ; RLS re class lists and outreach efforts and needs	Discovery (Non-Deposition)
7/24/2024	Guy Wallace	1.0	\$1,350	\$1,350	revise and edit draft opposition to motion to quash Omole deposition; com's with MTJ re same	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/24/2024	Jennifer Bybee	0.1	\$925	\$93	Review emails with co-counsel re discovery, named plaintiffs, depositions	Case Organization, Planning and Strategy
7/24/2024	Mark Johnson	0.8	\$1,150	\$920	calls (x2) w/ GBW re issues re completeness of expert disclosures, need to correct or supplement Mastin Brookhurst report, expert depo dates, Cross retainer agreement revision, potential mtn to certify damages class issue for appeal, mtn to compel class list, source code, contention rog responses and 14th set of doc requests and coms w/ OC re same, opposition to mtn to quash Omale depo subpoena, follow up investigation and/or discovery re maximum staffing report spreadsheets.	Case Organization, Planning and Strategy
7/24/2024	Mark Johnson	0.2	\$1,150	\$230	email coms w/ J Thornton re depo dates for experts various experts.	Depositions
7/24/2024	Mark Johnson	0.8	\$1,150	\$920	Review and draft response to correspondence from OC ER re discovery letters on mtns to compel enforcement w/ discovery order, contention rogs, source code, 14th set of rogs; revise and finalize same based on COC input	Discovery (Non-Deposition)
7/24/2024	Mark Johnson	0.3	\$1,150	\$345	email coms w/ RAB, RLS, GBW re Maximum Daily Staffing report spreadsheets, investigations re same, view, review and download samples	Discovery (Non-Deposition)
7/24/2024	Mark Johnson	0.4	\$1,150	\$460	email exchanges w/ J Mastin and J Yelin re Brookhurst expert report and photos; inspection of unity 103, need to correct/supplement report; com w/ GBW re same	Experts (Including Retention)
7/24/2024	Mark Johnson	0.2	\$1,150	\$230	email coms w/ Patrick Kennedy's office re depo date availability; emails w/ OC re same	Experts (Including Retention)
7/24/2024	Mark Johnson	3.7	\$1,150	\$4,255	work on opposition section of mtn to quash letter brief, email to COC with draft and comments re same.	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/24/2024	Mark Johnson	0.6	\$1,150	\$690	revise and finalize P section of joint letter brief re mtn to quash Omale depo	Other Motions
7/24/2024	Rachel Steyer	0.4	\$750	\$300	attempted outreach, leaving VMs, reviewing and updating notes in spreadsheet	Class Outreach and Contact
7/24/2024	Rachel Steyer	0.3	\$750	\$225	call with sister of current residnet, discussed case and planned follow up call	Class Outreach and Contact
7/24/2024	Rachel Steyer	1.0	\$750	\$750	conducted intake call with daughter of current resident	Class Outreach and Contact
7/24/2024	Rachel Steyer	0.4	\$750	\$300	call with sister/POA of current resident, discussed case further and set check in call	Class Outreach and Contact
7/24/2024	Rachel Steyer	0.2	\$750	\$150	reviewing communications with opposing counsel re discovery letter briefs	Communications With Opposing Counsel
7/24/2024	Rachel Steyer	0.4	\$750	\$300	reviewing depo exhibit tracking spreadsheets and transcripts	Depositions
7/24/2024	Rachel Steyer	3.2	\$750	\$2,400	updating and correcting discovery index	Discovery (Non-Deposition)
7/25/2024	Guy Wallace	1.7	\$1,350	\$2,295	review and analysis of decision re certification of subclasses and identification of subclasses; com's with JAU re same (.6)	Class Certification
7/25/2024	Guy Wallace	1.2	\$1,350	\$1,620	legal research and analysis re Ninth Circuit precedents and individualized damages proceedings in class actions; Leyva; Vaquero; Olean; Bowerman	Class Certification
7/25/2024	Guy Wallace	0.7	\$1,350	\$945	review and analysis of certification from Rutner; com's with MTJ; RLS re same	Discovery (Non-Deposition)
7/25/2024	Guy Wallace	0.7	\$1,350	\$945	review and analysis of 56 categories of documents and Defendants' production re same; com's with MTJ re same	Discovery (Non-Deposition)
7/25/2024	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re injury in fact	Class Certification
7/25/2024	Jennifer Bybee	0.6	\$925	\$555	Com's with GBW re opinion, injury in fact, and appeal	Class Certification
7/25/2024	Jennifer Bybee	1.4	\$925	\$1,295	Review cases cited in Court's order re class certification and showing injury in fact	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/25/2024	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW re requesting class list for access claims for missing period; pending motion to compel letters, responding to D's certification of production and 2 more potential discovery motions.	Case Organization, Planning and Strategy
7/25/2024	Rachel Steyer	1.2	\$750	\$900	1292 legal research re individualized damages b3 inquiry	Appeal
7/25/2024	Rachel Steyer	0.2	\$750	\$150	response to KS re latest class list	Class Outreach and Contact
7/25/2024	Rachel Steyer	0.3	\$750	\$225	call with son of current resident, discussed case, agreed to wait for further follow up	Class Outreach and Contact
7/26/2024	Guy Wallace	1.6	\$1,350	\$2,160	review and analysis of predominance discussion in order denying damages subclasses and identification of errors; com's with JRA; JAU re same	Appeal
7/26/2024	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ; RLS re class outreach re additional proposed representative for the Brookhurst subclass	Class Certification
7/26/2024	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of 56 categories of documents for supplemental production; com's with MTJ re production of same and next steps re follow up	Discovery (Non-Deposition)
7/26/2024	Guy Wallace	0.3	\$1,350	\$405	com's with Waters re production of photos and notes to Defendants; depo prep	Experts (Including Retention)
7/26/2024	Guy Wallace	0.9	\$1,350	\$1,215	preparation of overview of claims and defenses for trial; identification of potential problem areas	Trial and Pretrial Preparation
7/26/2024	Guy Wallace	1.2	\$1,350	\$1,620	team zoom with GG; JY; BBK; AS; KS; MTJ; JAU; RLS re potential appeal re damages subclasses; trial structure; focus group re trial; expert depositions; follow up items re discovery	Trial and Pretrial Preparation
7/26/2024	Jennifer Bybee	1.1	\$925	\$1,018	Zoom conference call with co-counsel re Plaintiff Algame, appeal of class cert order, discovery, etc.	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/26/2024	Mark Johnson	1.3	\$1,150	\$1,495	team zoom w/ GBW, GCG, Yelin, Bien-Kahn, Spiegel, Jen B, Edmunson, Stilber Styer re appeal of damages certification ruling, outstanding discovery disputes, amending the complaint, plans for the CMC, expert depositions.	Case Organization, Planning and Strategy
7/26/2024	Rachel Steyer	0.8	\$750	\$600	further research in 1292 damages issue	Appeal
7/26/2024	Rachel Steyer	1.3	\$750	\$975	weekly zoom with RBGG, GBW, MTJ, JUB to review tasks and assignments	Case Organization, Planning and Strategy
7/26/2024	Rachel Steyer	0.6	\$750	\$450	attempted class outreach, leaving VMs, updating and reviewing notes in spreadsheet	Class Outreach and Contact
7/26/2024	Rachel Steyer	0.3	\$750	\$225	call with GBW to review and discuss Brookhurst outreach	Class Outreach and Contact
7/26/2024	Rachel Steyer	2.8	\$750	\$2,100	intake call w/Lori Eddy	Class Outreach and Contact
7/26/2024	Rachel Steyer	0.2	\$750	\$150	reviewing documents provided by potential witness, creating folder	Discovery (Non-Deposition)
7/26/2024	Rachel Steyer	0.5	\$750	\$375	reviewing latest production and updating spreadsheet	Discovery (Non-Deposition)
7/27/2024	Guy Wallace	2.6	\$1,350	\$3,510	preparation of initial outline of appeal re denial of (b)(3) access subclasses	Appeal
7/27/2024	Guy Wallace	2.7	\$1,350	\$3,645	legal research and analysis re key errors in district court's decision denying (b)(3) damages subclasses	Class Certification
7/27/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re 23(f) petition	Class Certification
7/29/2024	Guy Wallace	2.4	\$1,350	\$3,240	review and analysis of district court decision regarding motion for certification of access subclasses; com's with JRA; JAU re same (.6)	Class Certification
7/29/2024	Guy Wallace	3.8	\$1,350	\$5,130	preparation and drafting of initial outline of errors re money to certify damages subclasses; legal research and analysis re same	Other Motions
7/29/2024	Jennifer Bybee	0.3	\$925	\$278	Review Defendant's request to certify issue for interlocutory appeal	Appeal

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/29/2024	Jennifer Bybee	0.2	\$925	\$185	Look up whether interlocutory appeal requires a stay of proceedings in district court	Class Certification
7/29/2024	Rachel Steyer	4.5	\$750	\$3,375	research into 1292 individualized damages	Appeal
7/30/2024	Guy Wallace	2.6	\$1,350	\$3,510	preparation of initial outline of appeal of order re damages subclasses	Appeal
7/30/2024	Guy Wallace	0.6	\$1,350	\$810	com's with JRA; JAU re initial outline of appeal re denial of Unruh Act damages subclasses	Appeal
7/30/2024	Guy Wallace	0.4	\$1,350	\$540	com's with JY; RLS re potential substitute class representative re Brookhurst facility	Class Certification
7/30/2024	Guy Wallace	0.6	\$1,350	\$810	com's with JGT; MTJ re preparation for deposition of Rubin	Depositions
7/30/2024	Guy Wallace	1.3	\$1,350	\$1,755	preparation of list of SA documents for use in deposition of Rubin and line of questions re same; review and analysis of same; com's with JGT; RLS re same	Depositions
7/30/2024	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re further documents for Rubin depo and documents re Defendants' staffing, including inter alia Maximum Daily Staffing	Depositions
7/30/2024	Mark Johnson	0.6	\$1,150	\$690	video conference w/ Thornton, Wallace re Rubin depo topics, strategy.	Depositions
7/30/2024	Mark Johnson	1.8	\$1,150	\$2,070	review 2024 document production and documents involving or copying K Rubin for deposition.	Depositions
7/30/2024	Mark Johnson	0.5	\$1,150	\$575	coms w/ RLS and James Maher re Maximum Daily Staffing Clinical Dept. reports, review same, coms w/ J Thornton and GBW re use of same in deposition, send examples to JT for exhibits	Depositions
7/30/2024	Mark Johnson	0.2	\$1,150	\$230	coms w/ LEC and Thornton re depo scheduling, zoom information, communication w/ court reporting service and counsel	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/30/2024	Mark Johnson	0.4	\$1,150	\$460	review SA documents identified by RLS for Rubin depo	Depositions
7/30/2024	Mark Johnson	0.1	\$1,150	\$115	review emails from OC re additional class list production, certification of diligent searches for responsive documents	Discovery (Non-Deposition)
7/30/2024	Mark Johnson	0.5	\$1,150	\$575	research producing party obligation to produce docs labeled by request or "as kept in ordinary course of business"	Discovery (Non-Deposition)
7/30/2024	Mark Johnson	0.2	\$1,150	\$230	calls w/ GBW re discovery mtns re FSP class list, source code, contention rogs.	Other Motions
7/30/2024	Mark Johnson	2.5	\$1,150	\$2,875	review D oppo section to mtn to compel FSP class list and source code; re-work P section to address same,	Other Motions
7/30/2024	Rachel Steyer	1.4	\$750	\$1,050	attempted class outreach, leaving VMs, updating and reviewing notes in spreadsheet	Class Outreach and Contact
7/30/2024	Rachel Steyer	0.2	\$750	\$150	spoke w/son of former resident, scheduled intake call	Class Outreach and Contact
7/30/2024	Rachel Steyer	0.3	\$750	\$225	spoke w/son of current resident to follow up re staff/service issues	Class Outreach and Contact
7/30/2024	Rachel Steyer	0.3	\$750	\$225	received call back from son of current resident, discussed case, scheduled intake call	Class Outreach and Contact
7/30/2024	Rachel Steyer	0.5	\$750	\$375	follow up call with Lori Eddy to review next steps re becoming named plaintiff	Class Outreach and Contact
7/30/2024	Rachel Steyer	0.2	\$750	\$150	spoke w/family member of resident, no FSP issues	Class Outreach and Contact
7/30/2024	Rachel Steyer	0.5	\$750	\$375	follow up call with Dave Meranda to complete intake	Class Outreach and Contact
7/30/2024	Rachel Steyer	0.4	\$750	\$300	call with GBW to review upcoming call with potential named plaintiff	Class Outreach and Contact
7/30/2024	Rachel Steyer	0.3	\$750	\$225	reviewing defendants' portions of discovery letter briefs	Discovery (Non-Deposition)
7/30/2024	Rachel Steyer	0.2	\$750	\$150	reviewing emails provided by intake caller	Discovery (Non-Deposition)
7/30/2024	Rachel Steyer	0.5	\$750	\$375	reviewing docs for Rubin emails re SA	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/31/2024	Guy Wallace	0.9	\$1,350	\$1,215	com's with GG; JY; MTJ re preparation for August 1 CMC	Case Management Conferences
7/31/2024	Guy Wallace	0.9	\$1,350	\$1,215	revise and edit draft MTC re late production of class lists and source code materials; com's with MTJ re same	Other Motions
7/31/2024	Guy Wallace	0.5	\$1,350	\$675	review and analysis of draft MTC re further sets of requests for production of documents; revise and edits same; com's with MTJ re same	Other Motions
7/31/2024	Guy Wallace	1.9	\$1,350	\$2,565	review and analysis of Fourth Amended Complaint; assessment of potential areas of amendment for discussion at CMC	Pleadings and Motions Re: Pleadings
7/31/2024	Mark Johnson	0.9	\$1,150	\$1,035	Video call w/ Wallace, Grunfeld, Yelin re planning for CMC, call w/ GBW re same (.2)	Case Organization, Planning and Strategy
7/31/2024	Mark Johnson	0.2	\$1,150	\$230	coms w/ J Thornton re expert depo dates, docs referenced in Rubin depo	Case Organization, Planning and Strategy
7/31/2024	Mark Johnson	0.6	\$1,150	\$690	Review sample briefing from B Umpierre re work product privilege for communications w/ residents	Discovery (Non-Deposition)
7/31/2024	Mark Johnson	0.5	\$1,150	\$575	email exchange w/ RLS re analysis of work product argument, Ds RFPs re communications and our responses; review responses	Discovery (Non-Deposition)
7/31/2024	Mark Johnson	2.5	\$1,150	\$2,875	work on reply section and revision of joint letter brief re access contention rogs and 14th set of RFPs	Other Motions
7/31/2024	Mark Johnson	3.6	\$1,150	\$4,140	draft and revise letter brief and reply re class list and source code	Other Motions
7/31/2024	Mark Johnson	1.3	\$1,150	\$1,495	further revisions to discovery letter briefs; emails to OC re same	Other Motions
7/31/2024	Mark Johnson	0.4	\$1,150	\$460	review GBW analysis of possible amendments to Complaint; com re same.	Pleadings and Motions Re: Pleadings
7/31/2024	Rachel Steyer	0.8	\$750	\$600	email to MTJ and GBW re response to defendants re produced third party communications	Communications With Opposing Counsel

Date	Initials	Hours	Rate	Amount	Description	ProjectName
7/31/2024	Rachel Steyer	0.3	\$750	\$225	response to MTJ and GBW re communications with OC re class outreach	Communications With Opposing Counsel
7/31/2024	Rachel Steyer	0.2	\$750	\$150	proofreading MTJ revised discovery letter brief	Discovery (Non-Deposition)
7/31/2024	Rachel Steyer	3.0	\$750	\$2,250	reviewing Kelly Rubin docs	Discovery (Non-Deposition)
7/31/2024	Rachel Steyer	0.2	\$750	\$150	proofreading MTJ draft discovery letter	Discovery (Non-Deposition)
7/31/2024	Rachel Steyer	0.5	\$750	\$375	response to MTJ re producing third party comms to defendants	Discovery (Non-Deposition)
7/31/2024	Rachel Steyer	1.7	\$750	\$1,275	reviewing and updating discovery index	Discovery (Non-Deposition)
8/1/2024	Guy Wallace	2.9	\$1,350	\$3,915	preparation of initial outline of appeal re denial of (b)(3) damages subclasses	Appeal
8/1/2024	Guy Wallace	0.9	\$1,350	\$1,215	com's with JRA; MTJ; JAU re initial outline of appeal of issues re damages subclasses	Appeal
8/1/2024	Guy Wallace	0.9	\$1,350	\$1,215	zoom with GG; JY; AS; MTJ re results of CMC and further steps and tasks re same	Case Management Conferences
8/1/2024	Guy Wallace	1.0	\$1,350	\$1,350	prepare for and participate in further CMC with J. Gilliam	Case Management Conferences
8/1/2024	Guy Wallace	0.9	\$1,350	\$1,215	preparation of detailed initial outline of errors in district court's opinion re Rule 23(b)(3) subclasses	Other Motions
8/1/2024	Guy Wallace	1.2	\$1,350	\$1,620	analysis of potential approaches to settlement; com's with GG; CJH; BU re same	Settlement
8/1/2024	Jennifer Bybee	0.3	\$925	\$278	Review documents to try to figure out how many additional barriers in 2024 v 2019	Class Certification
8/1/2024	Mark Johnson	0.8	\$1,150	\$920	CMC w/ Judge Gilliam, Rutner, Jacobsen, Bertino, Wallace, Grunfeld re trial planning.	Case Management Conferences
8/1/2024	Mark Johnson	1.2	\$1,150	\$1,380	zoom call w/ GBW, Grunfeld, Yelin, Spiegel, to discuss issues addressed at CMC and trial planning, expert depositions, pending discovery,	Case Organization, Planning and Strategy
8/1/2024	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW re settlement issues, strategy	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/1/2024	Mark Johnson	0.9	\$1,150	\$1,035	draft correspondence to OC re demand for supplementation of communications w/ residents; review notes, emails from RLS and prior requests and responses for same.	Discovery (Non-Deposition)
8/1/2024	Mark Johnson	0.5	\$1,150	\$575	coms w/ RAB re new production; review and analyze metadata re same; coms w/ COC re same.	Discovery (Non-Deposition)
8/1/2024	Mark Johnson	0.6	\$1,150	\$690	review proposed addendum re barriers in unit 103 at Brookhurst from Mastin; review other emails re photos; email exchanges w/ Mastin re same; email to COC re same.	Experts (Including Retention)
8/1/2024	Mark Johnson	0.1	\$1,150	\$115	email Thornton re expert depositions	Experts (Including Retention)
8/1/2024	Mark Johnson	0.5	\$1,150	\$575	further review of Ds reply section of Mtn to quash Omole depo and P opp for potential edits, pull and format exhibits, email to OC re same	Other Motions
8/1/2024	Mark Johnson	0.4	\$1,150	\$460	Review Wallace 6 page outline for mtn for certification for appeal of 23(b)(3) damages / standing issue.	Other Motions
8/1/2024	Mark Johnson	1.7	\$1,150	\$1,955	work on ltr brief for mtn to compel 56 categories supplemental production.	Other Motions
8/1/2024	Mark Johnson	1.0	\$1,150	\$1,150	conference w/ GBW re proposed mtn to certify b3 issue for appeal, analysis of issues and potential counter arguments, proposed communication w/ OC re trial planning	Other Motions
8/1/2024	Mark Johnson	0.9	\$1,150	\$1,035	multiple email exchanges w/ OC re 2 motions to compel letter briefs, D objections and insistence on re-write, meeting and conferring.	Other Motions
8/1/2024	Rachel Steyer	1.1	\$750	\$825	conducted partial intake with son of current resident	Class Outreach and Contact
8/1/2024	Rachel Steyer	1.9	\$750	\$1,425	attempted class outreach, leaving VMs, updating and reviewing notes	Class Outreach and Contact
8/1/2024	Rachel Steyer	0.2	\$750	\$150	spoke w/daughter of current resident, no FSP issues	Class Outreach and Contact
8/1/2024	Rachel Steyer	0.2	\$750	\$150	spoke w/son of current resident, no FSP issues	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/2/2024	Guy Wallace	1.3	\$1,350	\$1,755	preparation of further draft of initial outline of key points re appeal of order re damages subclasses	Appeal
8/2/2024	Guy Wallace	0.4	\$1,350	\$540	com's with JGT; MTJ re Defendants' production re source code and defects re same	Discovery (Non-Deposition)
8/2/2024	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of the "56 categories" of documents for supplemental production; MJ Beeler Order of April 25, 2024; analysis of Defendants' productions; preparation of further revised list re categories of non-produced documents; com's with MTJ re same	Discovery (Non-Deposition)
8/2/2024	Guy Wallace	0.4	\$1,350	\$540	com's with Waters; Mastin re preparation for deposition	Experts (Including Retention)
8/2/2024	Guy Wallace	1.9	\$1,350	\$2,565	review and analysis of legal standards re interlocutory appeals; preparation of initial arguments re same; com's with JAU re same (.6)	Other Motions
8/2/2024	Jennifer Bybee	0.3	\$925	\$278	Review Initial Outline of Key Points on Appeal	Appeal
8/2/2024	Jennifer Bybee	2.7	\$925	\$2,498	Draft Mtn to Certify Order for Interlocutory Appeal	Appeal
8/2/2024	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re appeal and CMC recap	Appeal
8/2/2024	Jennifer Bybee	0.1	\$925	\$93	Review email coms with GBW re CMC and appeal	Class Certification
8/2/2024	Mark Johnson	0.5	\$1,150	\$575	call w/ J Thornton and G Wallace re benchmark source code, tables needed, meet and confer w/ OC, contract labor issues.	Discovery (Non-Deposition)
8/2/2024	Mark Johnson	0.1	\$1,150	\$115	call w/ GBW re meet and confer topics with Defendants.	Discovery (Non-Deposition)
8/2/2024	Mark Johnson	1.5	\$1,150	\$1,725	video meet and confer w/ OC Rutner, Bertino, Jacobsen, Gravante and w/ Wallace re motions to compel source code, contention rogs, 14th set of doc request, 13th set of doc requests, supp docs, trial planning and proposed stip.	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/2/2024	Mark Johnson	0.3	\$1,150	\$345	follow up call w GBW after meet and confer re discovery mtns, extensions of deadline for filing motions, recent document production.	Other Motions
8/3/2024	Guy Wallace	1.4	\$1,350	\$1,890	legal research and analysis re J. Gilliam's standard for injury and liability re physical access claims under the ADA and the Unruh Act; revise and edit initial outline of appeal re same	Appeal
8/3/2024	Guy Wallace	1.9	\$1,350	\$2,565	preparation of revised version of initial outline of arguments re appeal of denial of (b)(3) damages subclasses	Appeal
8/3/2024	Jennifer Bybee	3.3	\$925	\$3,053	Draft legal argument section of Motion for interlocutory appeal	Appeal
8/4/2024	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ re harm to class members; issues re "difficulty" and second stage proceedings re damages and nature of such proceedings	Appeal
8/5/2024	Guy Wallace	2.8	\$1,350	\$3,780	revise preliminary outline; points regarding the nature of the issues to be addressed in second stage proceedings; legal research and analysis re Bowerman and discussion of damages phase in second stage	Appeal
8/5/2024	Guy Wallace	0.3	\$1,350	\$405	com's with BU re potential rebuttal report re Dr. Saad and opinions proffered thereby	Experts (Including Retention)
8/5/2024	Guy Wallace	0.3	\$1,350	\$405	com's with Waters re Defendants' arguments re differential impact of ADAAG violations	Experts (Including Retention)
8/5/2024	Guy Wallace	0.7	\$1,350	\$945	revise and edit draft motion for extension of time to file motions to compel; com's with MTJ re same	Other Motions
8/5/2024	Guy Wallace	0.9	\$1,350	\$1,215	com's with JY; MTJ; Rutner; Bertino re proposals re bifurcation of issues	Trial and Pretrial Preparation
8/5/2024	Jennifer Bybee	4.1	\$925	\$3,793	Draft Motion to Certify Issue for Interlocutory Appeal	Appeal
8/5/2024	Mark Johnson	0.3	\$1,150	\$345	call w/ TCC re recent developments, expert deposition calendar and coverage.	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/5/2024	Rachel Steyer	0.7	\$750	\$525	completing intake with daughter of current resident	Class Outreach and Contact
8/5/2024	Rachel Steyer	0.3	\$750	\$225	received call back from daughter of current resident, no FSP issues	Class Outreach and Contact
8/5/2024	Rachel Steyer	0.3	\$750	\$225	reviewing defendants supplemental RFPs	Discovery (Non-Deposition)
8/5/2024	Rachel Steyer	2.7	\$750	\$2,025	reviewing and gathering transportation and emergency evacuation docs for experts	Discovery (Non-Deposition)
8/5/2024	Rachel Steyer	1.8	\$750	\$1,350	reviewing latest productions and updating master index spreadsheet	Discovery (Non-Deposition)
8/5/2024	Rachel Steyer	0.4	\$750	\$300	proofreading MTJ draft admin motion re discovery deadline extension	Other Motions
8/5/2024	Travis Close	0.4	\$850	\$340	Call with MTJ re: deposition scheduling & briefing on court's recent orders	Case Organization, Planning and Strategy
8/5/2024	Travis Close	1.4	\$850	\$1,190	Review and analyze communications received since july 18, 2024	Case Organization, Planning and Strategy
8/5/2024	Travis Close	0.3	\$850	\$255	Email to LEC re: document analysis assignment regarding contract labor used at San Ramon facility	Case Organization, Planning and Strategy
8/5/2024	Travis Close	0.3	\$850	\$255	review and analyze joint discovery letter re: motion to quash Omole deposition	Case Organization, Planning and Strategy
8/5/2024	Travis Close	0.7	\$850	\$595	Review and analyze court's order granting in part, denying in part motion for certification of subclasses	Case Organization, Planning and Strategy
8/6/2024	Guy Wallace	0.4	\$1,350	\$540	com's with JAU; MTJ re preparation of motion re certification of issue for appeal	Appeal
8/6/2024	Guy Wallace	0.8	\$1,350	\$1,080	com's with Thornton; BU; MTJ re Defendants' belated production of contract labor materials and response re same; Dr. Saad's claims re variations w/r/t ED's regarding compliance with Service Alignment	Experts (Including Retention)
8/6/2024	Guy Wallace	0.6	\$1,350	\$810	com's with Rutner; MTJ re proposed approach to structure of trial; staffing claims	Trial and Pretrial Preparation
8/6/2024	Jennifer Bybee	2.9	\$925	\$2,683	Draft Mtn for Interlocutory Appeal	Appeal
8/6/2024	Jennifer Bybee	0.1	\$925	\$93	Review emails with co-counsel re MSJ	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/6/2024	Mark Johnson	0.4	\$1,150	\$460	review sample of 189 files of source code to estimate size, number of lines of coding for admin mtn	Discovery (Non-Deposition)
8/6/2024	Mark Johnson	0.3	\$1,150	\$345	follow up call w/ GBW re Brookdale contract labor issue, Omole deposition, mtn to extend discovery mtn deadline, other motions	Discovery (Non-Deposition)
8/6/2024	Mark Johnson	0.7	\$1,150	\$805	call w/ June Kailes re possible site inspections, scope of expert report and testimony	Experts (Including Retention)
8/6/2024	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW recapping call w/ Kailes re possible site inspections and weighing pros and cons, difficulties in seeking same, scope of her testimony.	Experts (Including Retention)
8/6/2024	Mark Johnson	0.3	\$1,150	\$345	coms w/ RLS and TCC re reviewing new docs for emails and docs related to Kailes testimony, com w/ Kailes re possible inspections. schedulng Kailes prep sessions for depo	Experts (Including Retention)
8/6/2024	Mark Johnson	0.6	\$1,150	\$690	review Mastin 2024 expert reports for identification of barriers related to emergency evacluation; review memo from TCC re same; com w/ TCC re decision on inspection issue.	Experts (Including Retention)
8/6/2024	Mark Johnson	0.4	\$1,150	\$460	coms w/ N Thompson re preparation of FTP with zip file of Waters photos, corrections to same; review file structure and contents for Waters photos and notes; com w/ OC re same	Experts (Including Retention)
8/6/2024	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW re contract labor issue, possible mtn to exclude evidence of same	Other Motions
8/6/2024	Mark Johnson	0.4	\$1,150	\$460	review and accept edits to draft stipulation re partial extension of discovery motion deadline; com w/ OC re same, com w/ COC re filng	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/6/2024	Mark Johnson	4.0	\$1,150	\$4,600	revise draft admin mtn re discovery mtn deadline, look up prior correspondence and doc production for same; draft supporting declaration and proposed order	Other Motions
8/6/2024	Travis Close	1.4	\$850	\$1,190	Draft report of emergency evacuation and transportation document analysis since publishing of rule 26 reports	Case Organization, Planning and Strategy
8/6/2024	Travis Close	0.2	\$850	\$170	Email to MTJ re: today's call with June Kailes	Case Organization, Planning and Strategy
8/6/2024	Travis Close	0.2	\$850	\$170	Email to RLS re: assignment for doc review of emergency evac and transportation documents	Case Organization, Planning and Strategy
8/6/2024	Travis Close	0.8	\$850	\$680	Legal research on area of refuge requirements in California Building Code	Case Organization, Planning and Strategy
8/6/2024	Travis Close	1.3	\$850	\$1,105	Review, analyze, and organize citations to barriers regarding handrails and areas of refuge in Rule 26 reports for the San Ramon facility	Case Organization, Planning and Strategy
8/6/2024	Travis Close	1.4	\$850	\$1,190	Review, analyze, and organize citations to barriers regarding handrails and areas of refuge in Rule 26 reports for the Scotts Valley facility	Case Organization, Planning and Strategy
8/6/2024	Travis Close	0.9	\$850	\$765	Review, analyze, and organize signed FSP acknowledgement forms received in recent productions	Case Organization, Planning and Strategy
8/6/2024	Travis Close	0.2	\$850	\$170	Email to MTJ re: deposition prep dates for June Kailes	Case Organization, Planning and Strategy
8/6/2024	Travis Close	0.7	\$850	\$595	Research application of definition of "legitimate safety requirements" in context of wheelchair transportation in federal regulations	Case Organization, Planning and Strategy
8/6/2024	Travis Close	1.4	\$850	\$1,190	Review and analyze recent production of FSP/transportation ESI for instances of class member complaints	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/7/2024	Guy Wallace	0.8	\$1,350	\$1,080	com's with MTJ re preparation for expert depositions; initial preparation of potential topics re Waters and Mastin	Depositions
8/7/2024	Guy Wallace	0.8	\$1,350	\$1,080	com's with BU re response to Dr. Saad's claims re variation among ED's re benchmark compliance; preparation of counterpoints re same	Experts (Including Retention)
8/7/2024	Guy Wallace	1.0	\$1,350	\$1,350	review and analysis of draft PSJ	Motion for Summary Judgment / Adjudication
8/7/2024	Guy Wallace	0.6	\$1,350	\$810	revise and edit motion to extend cut off for filing discovery motions	Other Motions
8/7/2024	Guy Wallace	1.3	\$1,350	\$1,755	review and analysis of draft PSJ; preparation of comments re same	Other Motions
8/7/2024	Guy Wallace	0.4	\$1,350	\$540	com's with BBK; MTJ re preparation for meet and confer with Defendants' re issues arising from August 1, 2024 CMC	Trial and Pretrial Preparation
8/7/2024	Guy Wallace	0.9	\$1,350	\$1,215	com's with Ruther; Bertino; BU; MTJ; TCC re sequence of issues to be tried; briefings schedules re PSJ and other motions; stay of staffing-related claims	Trial and Pretrial Preparation
8/7/2024	Guy Wallace	0.4	\$1,350	\$540	zoom with BBK; MTJ; TCC re preparation of proposed stipulation and order re issues discussed with Defendants during meet and confer	Trial and Pretrial Preparation
8/7/2024	Guy Wallace	0.4	\$1,350	\$540	review and analysis of com's from Mastin re additional barriers; com's with MTJ re same	Trial and Pretrial Preparation
8/7/2024	Guy Wallace	0.5	\$1,350	\$675	review and analysis of draft stipulation and order re topics arising from August 1, 2024 CMC; revise and edit same; com's with BBK; JY; MTJ re same	Trial and Pretrial Preparation
8/7/2024	Jennifer Bybee	2.8	\$925	\$2,590	Draft Motion to Certify Interlocutory Appeal	Appeal
8/7/2024	Mark Johnson	0.6	\$1,150	\$690	meet and confer w OC and Wallace, Bien-Kahn re trial plan and stipulations requested by the Court	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/7/2024	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW and BBK re strategy and issues for meet and confer with OC re trial and pre-trial scheduling, stipulation to be submitted by the Court.	Case Organization, Planning and Strategy
8/7/2024	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW, BBK, TCC following meet and confer w/ OC re trial plan, stipulation for submission to court re pre-trial scheduling issues and settlement conference.	Case Organization, Planning and Strategy
8/7/2024	Mark Johnson	0.7	\$1,150	\$805	review draft stip for submission to court re pre-trial and trial dates and procedures and GBW edits to same. propose additional edits and draft email to COC re other issues to be addressed in same.	Case Organization, Planning and Strategy
8/7/2024	Rachel Steyer	0.3	\$750	\$225	proofreading revised draft admin motion to extend discovery cut off	Discovery (Non-Deposition)
8/7/2024	Rachel Steyer	1.0	\$750	\$750	gathering additional San Ramon contract labor invoices	Discovery (Non-Deposition)
8/7/2024	Rachel Steyer	0.4	\$750	\$300	reviewing status of production of Omole emails	Discovery (Non-Deposition)
8/7/2024	Travis Close	0.5	\$850	\$425	Review, analyze, propose revisions to motion to certify order for interlocutory appeal	Appeal
8/7/2024	Travis Close	0.2	\$850	\$170	Email to LEC re: August 1 transcript of CMC with Judge Gilliam	Case Management Conferences
8/7/2024	Travis Close	0.5	\$850	\$425	Email to JIK re: dates and general strategy for deposition preparation	Case Organization, Planning and Strategy
8/7/2024	Travis Close	0.4	\$850	\$340	Review, analyze, and propose revision to admin motion to extend motion discovery deadline	Case Organization, Planning and Strategy
8/7/2024	Travis Close	0.2	\$850	\$170	Review and analyze court's order denying motion to quash depo of Omole	Case Organization, Planning and Strategy
8/7/2024	Travis Close	0.7	\$850	\$595	Meeting with MTJ, GBW, BBK, and opposing counsel re: stipulations to bifurcate staffing claims and other related items	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/7/2024	Travis Close	1.6	\$850	\$1,360	Review and analyze recent emergency evacuation plans & supplemental forms produced by Defendants since completion of Rule 26 reports	Case Organization, Planning and Strategy
8/7/2024	Travis Close	0.3	\$850	\$255	Meet with MTJ, BBK, GBW to debrief following today's m/c with defendants	Case Organization, Planning and Strategy
8/7/2024	Travis Close	0.6	\$850	\$510	Email to GBW, GG (co-counsel) re: latest invoice and requested contract amendments from Doug Cross	Case Organization, Planning and Strategy
8/7/2024	Travis Close	1.3	\$850	\$1,105	Legal research on proper procedure for motion to bifurcate claims and implications on damages to be sought during trial	Case Organization, Planning and Strategy
8/8/2024	Guy Wallace	2.1	\$1,350	\$2,835	review and analysis of expert reports and declarations of Dr. Saad; Josh Allen; com's with JGT; BU; MTJ re same and rebuttal reports re same	Experts (Including Retention)
8/8/2024	Guy Wallace	3.2	\$1,350	\$4,320	review and analysis of draft motion for PSJ; revise and edit same; com's with BBK; Waters re same (.5)	Motion for Summary Judgment / Adjudication
8/8/2024	Guy Wallace	0.3	\$1,350	\$405	com's with JRA re draft motion to certify issue for appeal	Other Motions
8/8/2024	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of initial draft of motion to certify issue for appeal	Other Motions
8/8/2024	Guy Wallace	1.3	\$1,350	\$1,755	review and analysis of Defendants' motion to decertify; com's with BBK; MTJ re same	Other Motions
8/8/2024	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of drafts of proposed stipulation and order re August 1, 2024 CMC issues; com's with Rutner; MTJ re same	Trial and Pretrial Preparation
8/8/2024	Jennifer Bybee	2.3	\$925	\$2,128	Finalize draft of Motion for Interlocutory Appeal	Appeal
8/8/2024	Rachel Steyer	0.9	\$750	\$675	reviewing and updating discovery production spreadsheet for MTJ	Discovery (Non-Deposition)
8/8/2024	Rachel Steyer	3.4	\$750	\$2,550	reviewing production and updating spreadsheet	Discovery (Non-Deposition)
8/8/2024	Rachel Steyer	0.4	\$750	\$300	reviewing defendants' motion to decertify	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/8/2024	Travis Close	0.5	\$850	\$425	Review and analyze transcript of 8-1-24 CMC proceedings	Case Organization, Planning and Strategy
8/8/2024	Travis Close	0.2	\$850	\$170	Email to LEC re: issues with receipt of court's transcript of 8-1-24 proceedings	Case Organization, Planning and Strategy
8/8/2024	Travis Close	1.4	\$850	\$1,190	Legal research re: ninth circuit district court cases interpreting & applying requirement from Oliver v. Ralph's Grocery to conform barriers to be tried to current complaint	Case Organization, Planning and Strategy
8/8/2024	Travis Close	1.5	\$850	\$1,275	Review, analyze, and summarize policy changes & developments to FSP from May 2024-present based on latest batch of emails received #1-144 (BKD3098837-BKD3099277)	Case Organization, Planning and Strategy
8/8/2024	Travis Close	0.8	\$850	\$680	Review, analyze, and organize updated training videos/courses received for wheelchair securement & resident safety	Case Organization, Planning and Strategy
8/8/2024	Travis Close	1.6	\$850	\$1,360	Review, analyze, and summarize policy changes & developments to FSP from May 2024-present based on latest batch of emails received #145-298 (BKD3099277-BKD3099728)	Case Organization, Planning and Strategy
8/8/2024	Travis Close	0.2	\$850	\$170	Review and analyze stipulation (as filed) re: topics raised at 8-1-24 CMC	Case Organization, Planning and Strategy
8/8/2024	Travis Close	0.6	\$850	\$510	Analyze recently produced documents with redactions for improperly redacted materials	Case Organization, Planning and Strategy
8/8/2024	Travis Close	0.6	\$850	\$510	Review and analyze second-to-lastest production of transportation-related emails from custodian Jeanine Monteleone re FSP implementation, BKD3095174-BKD3095547 (60-212 of 871)	Case Organization, Planning and Strategy
8/9/2024	Guy Wallace	1.3	\$1,350	\$1,755	legal research and analysis re appeals under section 1292; review and analysis of JAU draft re certification motion	Appeal

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/9/2024	Guy Wallace	0.5	\$1,350	\$675	review and analysis of Defendants' motion for decertification; declarations of Rutner; Saad re number of residents with mobility disabilities	Class Certification
8/9/2024	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of declaration and report of Dr. Saad; com's with BU; JGT re rebuttal report re same	Experts (Including Retention)
8/9/2024	Guy Wallace	2.4	\$1,350	\$3,240	review and analysis of report of Josh Allen; declarations and reports of Waters; Mastin; rebuttal points re same; com's with Waters re same (.3)	Experts (Including Retention)
8/9/2024	Guy Wallace	1.6	\$1,350	\$2,160	review and analysis of Order from J. Gilliam re trial structure; prepare for and participate in zoom with GG; JY; BBK; AS; BU; MTJ; TCC; RLS re PSJ; class outreach; opposition to Defendants' motion to decertify; remaining discovery motions and issues; trial preparation	Trial and Pretrial Preparation
8/9/2024	Jennifer Bybee	0.1	\$925	\$93	Email com's with GBW re motion to decertify and draft of motion for certification of issue for interlocutory appeal	Class Certification
8/9/2024	Jennifer Bybee	0.4	\$925	\$370	Review Defendants Mtn. to Decertify Subclasses	Class Certification
8/9/2024	Jennifer Bybee	0.2	\$925	\$185	Review Hoffman case re class certification opinions usually immediately appealable	Class Certification
8/9/2024	Mark Johnson	1.1	\$1,150	\$1,265	team mtg re status of projects, discovery, mtn to decertify subclasses, msj, class outreach	Case Organization, Planning and Strategy
8/9/2024	Mark Johnson	0.2	\$1,150	\$230	corres w/ J Mastin re depo scheduling	Experts (Including Retention)
8/9/2024	Mark Johnson	0.2	\$1,150	\$230	call w/ J Mastin re depo and depo prep scheduling.	Experts (Including Retention)
8/9/2024	Mark Johnson	0.1	\$1,150	\$115	com w/ OC re scheduling Mastin depo	Experts (Including Retention)
8/9/2024	Mark Johnson	0.1	\$1,150	\$115	com w/ GBW re expert rebuttal reports from Mastin, Waters re Allen's testimony.	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/9/2024	Mark Johnson	1.0	\$1,150	\$1,150	review OC dec iso mtn for decertification; locate and review prior correspondence from OC re protocol for identifying residents who use mobility aids, email exchanges w/ COC re same	Other Motions
8/9/2024	Rachel Steyer	1.1	\$750	\$825	weekly meeting with RBGG, BSU, TCC, GBW, MTJ to review and discuss ongoing tasks and assignments	Case Organization, Planning and Strategy
8/9/2024	Rachel Steyer	0.7	\$750	\$525	reviewing production for tabulating ED emails	Discovery (Non-Deposition)
8/9/2024	Rachel Steyer	1.7	\$750	\$1,275	preparing list of key new transportation and emergency evacuation docs	Experts (Including Retention)
8/9/2024	Travis Close	1.1	\$850	\$935	Meeting with MTJ, GBW, RLS, and co-counsel re: motion for summary judgment, opposing motion for decertification, discovery, upcoming depositions, trial prep	Case Organization, Planning and Strategy
8/9/2024	Travis Close	0.2	\$850	\$170	Email to GBW re: data for number of non-arbitration disability class members	Case Organization, Planning and Strategy
8/9/2024	Travis Close	1.3	\$850	\$1,105	Analyze data produced by defendants providing basis for calculations in motion for decertification re: number of FSP class members who opted out of arbitration	Case Organization, Planning and Strategy
8/9/2024	Travis Close	0.8	\$850	\$680	Legal research on proper timing for substitution of plaintiff after close of fact discovery	Case Organization, Planning and Strategy
8/9/2024	Travis Close	1.4	\$850	\$1,190	Review and analyze complaints by residents of Brookhurst facility who may be currently living there (for possible substitution of plaintiff)	Discovery (Non-Deposition)
8/9/2024	Travis Close	1.5	\$850	\$1,275	Analyze data produced by defendants providing basis for calculations in motion for decertification re: number of non-arbitration disability class members	Other Motions
8/10/2024	Guy Wallace	1.1	\$1,350	\$1,485	legal research and analysis re section 1292 and controlling questions of law	Appeal
8/10/2024	Guy Wallace	3.8	\$1,350	\$5,130	review and analysis of draft of motion for PSJ; revise and edit same	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/10/2024	Guy Wallace	0.6	\$1,350	\$810	legal research and analysis re section 1292 and controlling questions of law; com's with JAU re same	Other Motions
8/10/2024	Guy Wallace	1.5	\$1,350	\$2,025	analysis of whether Plaintiffs presented classwide evidence of injury; contention that Plaintiffs propose to prove their injuries by claims form	Other Motions
8/10/2024	Jennifer Bybee	1.7	\$925	\$1,573	Research whether class certification orders are generally appealable under 1292(b); research whether 1292(b) is precluded 23(f); research who is a necessary and proper party	Appeal
8/10/2024	Mark Johnson	0.1	\$1,150	\$115	Review email from OC re additional document production; email RAB re same	Discovery (Non-Deposition)
8/10/2024	Mark Johnson	1.1	\$1,150	\$1,265	draft memo summarizing timeline and facts re production of docs related to contract labor for potential motion in limine	Discovery (Non-Deposition)
8/11/2024	Guy Wallace	4.1	\$1,350	\$5,535	revise and edit draft PSJ	Motion for Summary Judgment / Adjudicaiton
8/12/2024	Guy Wallace	5.7	\$1,350	\$7,695	revise and edit draft motion seeking certification of issues for appeal regarding denial of (b)(3) certification	Appeal
8/12/2024	Guy Wallace	1.2	\$1,350	\$1,620	revise and edit draft motion for PSJ; review and analysis of comments; com's with BBK re tolerance issues	Motion for Summary Judgment / Adjudicaiton
8/12/2024	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re discovery mtns, opposition to mtn to extend discovery mtn deadline, mtn to exclude docs re contract labor	Discovery (Non-Deposition)
8/12/2024	Mark Johnson	0.5	\$1,150	\$575	coms w/ RLS re document production overview, email production distribution emails for EDs, terms to be used for Omale searches related to contract labor, review docs re same.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/12/2024	Mark Johnson	0.2	\$1,150	\$230	Com w/ OC re expert depos, revise and send schedule	Experts (Including Retention)
8/12/2024	Mark Johnson	4.8	\$1,150	\$5,520	work on Waters expert rebuttal report to Allen opinions.	Experts (Including Retention)
8/12/2024	Mark Johnson	2.0	\$1,150	\$2,300	review and edit draft MSJ; email to BKK and other COC re same	Motion for Summary Judgment / Adjudication
8/12/2024	Mark Johnson	0.3	\$1,150	\$345	review D opposition to mtn to extend deadline for fact discovery mtn.	Other Motions
8/12/2024	Mark Johnson	0.5	\$1,150	\$575	reemail coms and research re dimensional tolerances related to msj	Other Motions
8/12/2024	Rachel Steyer	1.1	\$750	\$825	attempting class outreach, leaving VMs, updating notes in spreadsheet	Class Outreach and Contact
8/12/2024	Rachel Steyer	0.2	\$750	\$150	call with daughter of current resident, no FSP issues	Class Outreach and Contact
8/12/2024	Rachel Steyer	0.5	\$750	\$375	preparing and gathering additional contract labor invoices, transmitting to GBW, MTJ, BSU, JT, DM	Discovery (Non-Deposition)
8/12/2024	Rachel Steyer	0.9	\$750	\$675	reviewing ED email dates	Discovery (Non-Deposition)
8/12/2024	Rachel Steyer	0.2	\$750	\$150	response to MTJ re contract labor companies info	Discovery (Non-Deposition)
8/12/2024	Rachel Steyer	0.2	\$750	\$150	response to MTJ re contract labor invoice search terms	Discovery (Non-Deposition)
8/12/2024	Rachel Steyer	3.2	\$750	\$2,400	reviewing latest production and updating spreadsheet index	Discovery (Non-Deposition)
8/12/2024	Rachel Steyer	0.2	\$750	\$150	reviewing defendants opposition to admin motion	Other Motions
8/12/2024	Travis Close	0.7	\$850	\$595	Analyze Brookdale's recent sales performance and revenue/occupancy growth nationally to determine financial status for barrier removal	Case Organization, Planning and Strategy
8/12/2024	Travis Close	0.6	\$850	\$510	Review and analyze memo from 2018 on dimensional tolerances, and determine which parts require updated information from case law and other developments	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/12/2024	Travis Close	0.3	\$850	\$255	Review and analyze defendants' opposition to motion to extend discovery deadline and accompanying declaration	Case Organization, Planning and Strategy
8/12/2024	Travis Close	1.4	\$850	\$1,190	Review and analyze plaintiffs' draft motion for partial summary judgment	Case Organization, Planning and Strategy
8/12/2024	Travis Close	0.8	\$850	\$680	Analysis of Mastin Rule 26 report for barriers cited in plaintiffs' draft PSJ to use for accompanying declaration	Case Organization, Planning and Strategy
8/12/2024	Travis Close	0.8	\$850	\$680	Legal research on updated guidance from DOJ Access Board re: construction/dimensional tolerances	Case Organization, Planning and Strategy
8/12/2024	Travis Close	1.1	\$850	\$935	Research online copies of versions of California Building Code prior to 1990	Case Organization, Planning and Strategy
8/13/2024	Guy Wallace	0.4	\$1,350	\$540	com's with JRA; JAU re draft of brief re motion to certify issues for review pursuant to section 1292	Appeal
8/13/2024	Guy Wallace	1.7	\$1,350	\$2,295	review and analysis of draft of motion to certify issue for appeal; preparation of revisions re same	Appeal
8/13/2024	Guy Wallace	2.6	\$1,350	\$3,510	preparation and drafting of rebuttal report of Waters re Josh Allen	Experts (Including Retention)
8/13/2024	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of draft expert rebuttal report of Dr. Flores; com's with BU re same	Experts (Including Retention)
8/13/2024	Jennifer Bybee	1.4	\$925	\$1,295	Review and edit draft of Motion to Certify Order for Interlocutory Appeal	Appeal
8/13/2024	Mark Johnson	0.5	\$1,150	\$575	call w/ R Stiner re status of case, recent developments, trial schedule, issues w/ Stacy, medical issues.	Case Organization, Planning and Strategy
8/13/2024	Mark Johnson	0.2	\$1,150	\$230	coms w/ S Stiner re status of case, sanctions mtn, trial bifurcation, issues w/ care	Case Organization, Planning and Strategy
8/13/2024	Mark Johnson	0.2	\$1,150	\$230	coms w/ G Grunfeld and G Wallace re scheduling settlement conference w/ J. Spero	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/13/2024	Mark Johnson	0.8	\$1,150	\$920	begin review of Mastin expert declarations for depo prep	Depositions
8/13/2024	Mark Johnson	0.1	\$1,150	\$115	email to OC re Omole email searches	Discovery (Non-Deposition)
8/13/2024	Mark Johnson	3.7	\$1,150	\$4,255	work on Mastin rebuttal Rule 26 report..	Experts (Including Retention)
8/13/2024	Mark Johnson	0.1	\$1,150	\$115	email to OC re extension of time for filing opposition to D mtn to decertify class.	Other Motions
8/13/2024	Mark Johnson	1.8	\$1,150	\$2,070	review and edit draft mtn for certification of interlocutory appeal under 1292; email COC re same, review edits from RLs	Other Motions
8/13/2024	Rachel Steyer	0.6	\$750	\$450	reviewing draft motion to certify interlocutory appeal	Appeal
8/13/2024	Rachel Steyer	0.4	\$750	\$300	spoke w/son of current resident, discussed case, no FSP issues	Class Certification
8/13/2024	Rachel Steyer	0.4	\$750	\$300	attempted class outreach, leaving vms, updating notes in spreadsheet	Class Outreach and Contact
8/13/2024	Rachel Steyer	0.2	\$750	\$150	call w/daughter of current resident, no FSP issues	Class Outreach and Contact
8/13/2024	Rachel Steyer	0.4	\$750	\$300	call with Lori Eddy re following up/scheduling time this week	Class Outreach and Contact
8/13/2024	Rachel Steyer	0.3	\$750	\$225	call with daughter in law of current resident, discussed case, scheduled follow up call	Class Outreach and Contact
8/13/2024	Rachel Steyer	3.3	\$750	\$2,475	reviewing and updating index spreadsheet	Discovery (Non-Deposition)
8/13/2024	Rachel Steyer	1.4	\$750	\$1,050	reviewing BBK draft PMSJ re access barriers	Other Motions
8/13/2024	Travis Close	1.3	\$850	\$1,105	Review and analyze additional FSP-related documents recently produced by Defendants; add to organizational chart for Doug	Case Organization, Planning and Strategy
8/13/2024	Travis Close	1.7	\$850	\$1,445	Preliminary legal research re: additional cases on dimensional tolerances published since 2018	Case Organization, Planning and Strategy
8/13/2024	Travis Close	0.2	\$850	\$170	Call with GBW re: dimensional tolerances assignment	Case Organization, Planning and Strategy
8/13/2024	Travis Close	1.1	\$850	\$935	Review and analyze recent documents produced using search term "scooter" (re FSP)	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/13/2024	Travis Close	1.3	\$850	\$1,105	Review and analyze recent documents produced using search term "wheelchair" (re FSP)	Case Organization, Planning and Strategy
8/13/2024	Travis Close	0.9	\$850	\$765	Review and analyze draft motion to certify district court's class cert order for interlocutory appeal	Case Organization, Planning and Strategy
8/13/2024	Travis Close	1.3	\$850	\$1,105	Legal research on recent cases interpreting the "substantial ground for difference of opinion" prong for interlocutory appeal in the ninth circuit	Case Organization, Planning and Strategy
8/14/2024	Guy Wallace	0.6	\$1,350	\$810	review and analysis of Maintenance Manual; com's with MTJ re same	Experts (Including Retention)
8/14/2024	Guy Wallace	0.6	\$1,350	\$810	review and analysis of draft expert rebuttal reports of Dr. Flores; Waters; Mastin	Experts (Including Retention)
8/14/2024	Guy Wallace	0.3	\$1,350	\$405	com's with BU re staffing claims and data re Brookdale staffing below benchmarks	Experts (Including Retention)
8/14/2024	Guy Wallace	0.6	\$1,350	\$810	review and analysis of Residency Agreements and provision re residents have no tenancy rights; com's with RAB re same	Misc. Research
8/14/2024	Guy Wallace	3.8	\$1,350	\$5,130	revise and edit motion for certification of issue for appeal re denial of certification of (b)(3) subclasses	Other Motions
8/14/2024	Guy Wallace	0.5	\$1,350	\$675	settlement conference with MJ Spero; ER; JB; GG; MTJ	Settlement
8/14/2024	Guy Wallace	0.6	\$1,350	\$810	com's with GG; TMS; MTJ re settlement potential	Settlement
8/14/2024	Jennifer Bybee	0.1	\$925	\$93	Review emails from co-counsel re proposed edits to brief re interlocutory appeal	Appeal
8/14/2024	Jennifer Bybee	2.2	\$925	\$2,035	Perform legal cite check of motion to certify interlocutory appeal	Other Motions
8/14/2024	Jennifer Bybee	0.1	\$925	\$93	Review revised introduction to motion to certify issue for interlocutory review	Other Motions
8/14/2024	Jennifer Bybee	0.4	\$925	\$370	Incorporate new intro and redline edits into draft of motion for interlocutory appeal	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/14/2024	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW re maintenance manual produced by Ds on 5/27 and possible follow up; proposed edits to motion to certify decision for interlocutory appeal and strategy re same	Case Organization, Planning and Strategy
8/14/2024	Mark Johnson	0.7	\$1,150	\$805	calls w/ GBW re settlement strategy and underlying considerations for both parties, discovery issues, mtn for extension of time to file opp to class certification.	Case Organization, Planning and Strategy
8/14/2024	Mark Johnson	0.8	\$1,150	\$920	prepare revised pre-trial calendar of all events, review multiple documents, orders for same, com w/ COC re same.	Case Organization, Planning and Strategy
8/14/2024	Mark Johnson	0.3	\$1,150	\$345	coms w/ B Umpierre re Medi-Cal issues for S Stiner; coms w / R Stiner re same	Case Organization, Planning and Strategy
8/14/2024	Mark Johnson	0.9	\$1,150	\$1,035	draft responses to third set of document requests, review prior correspondence and production for same; com w/ COC re same and review proposed edits from RLS	Discovery (Non-Deposition)
8/14/2024	Mark Johnson	3.5	\$1,150	\$4,025	Work on Rule 26 Rebuttal report of Jeff Mastin re Josh Allen opinions.	Experts (Including Retention)
8/14/2024	Mark Johnson	0.3	\$1,150	\$345	review revised intro for mtn for certification of interlocutory appeal	Other Motions
8/14/2024	Mark Johnson	0.7	\$1,150	\$805	review and begin revising admin mtn to extend opp deadline for mtn to decertify class.	Other Motions
8/14/2024	Mark Johnson	0.5	\$1,150	\$575	joint call w/ MJ Spero re settlement conference timing and procedures w/ GCG, GBW, Bertino, Rutner, Gravantes, Jacobsen	Settlement
8/14/2024	Mark Johnson	0.2	\$1,150	\$230	follow up call w/ GBW, GCW after call w MJ Spero re settlement positions, settlement conference procedures	Settlement
8/14/2024	Rachel Steyer	0.6	\$750	\$450	proofreading 1292 appellate brief	Appeal

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/14/2024	Rachel Steyer	0.2	\$750	\$150	reviewing updated pre-trial scheduled circulated by MTJ	Case Organization, Planning and Strategy
8/14/2024	Rachel Steyer	0.7	\$750	\$525	reviewing/editing newer FSP class list	Class Outreach and Contact
8/14/2024	Rachel Steyer	1.7	\$750	\$1,275	attempting class outreach, leaving VMs, updating and reviewing notes in spreadsheet	Class Outreach and Contact
8/14/2024	Rachel Steyer	0.4	\$750	\$300	spoke w/current resident, discussed case, agreed to follow up in a few weeks	Class Outreach and Contact
8/14/2024	Rachel Steyer	0.2	\$750	\$150	spoke w/wife of current resident, no transportation services even available	Class Outreach and Contact
8/14/2024	Rachel Steyer	0.2	\$750	\$150	reviewing/proofreading draft response to defendants' RFPs	Discovery (Non-Deposition)
8/14/2024	Rachel Steyer	1.0	\$750	\$750	reviewing and updating master index spreadsheet	Discovery (Non-Deposition)
8/14/2024	Rachel Steyer	0.5	\$750	\$375	reviewing TCC memo on dimensional tolerances	Misc. Research
8/14/2024	Travis Close	1.4	\$850	\$1,190	Legal research on case law supporting motion to extend time for motion response pursuant to local rule 7-11	Case Organization, Planning and Strategy
8/14/2024	Travis Close	0.2	\$850	\$170	Email to Doug Cross re: scheduling follow up call for deposition preparation	Case Organization, Planning and Strategy
8/14/2024	Travis Close	1.7	\$850	\$1,445	Begin drafting motion for extension of time to respond to motion for decertification (intro)	Case Organization, Planning and Strategy
8/14/2024	Travis Close	2.4	\$850	\$2,040	Continue drafting motion to extend time for opposition to motion for decertification	Case Organization, Planning and Strategy
8/14/2024	Travis Close	0.2	\$850	\$170	Call with MTJ re: assignment for admin motion to extend time	Case Organization, Planning and Strategy
8/14/2024	Travis Close	1.1	\$850	\$935	Review and analyze updated documents bearing on Brookdale's vehicle replacement/procurement process	Case Organization, Planning and Strategy
8/14/2024	Travis Close	1.3	\$850	\$1,105	Review and analyze updated courses produced for wheelchair securement	Case Organization, Planning and Strategy
8/15/2024	Guy Wallace	0.9	\$1,350	\$1,215	revise and edit draft rebuttal report of Waters; com's with Waters; MTJ re same	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/15/2024	Guy Wallace	1.5	\$1,350	\$2,025	revise and edit draft rebuttal report of Mastin; com's with Mastin; MTJ re same	Experts (Including Retention)
8/15/2024	Guy Wallace	0.7	\$1,350	\$945	com's with JGT; BU; MTJ re Defendants' use of contract labor and late-production of extensive paper records re same and response thereto	Experts (Including Retention)
8/15/2024	Guy Wallace	3.4	\$1,350	\$4,590	revise and edit draft motion for interlocutory appeal re denial of (b)(3) subclasses	Other Motions
8/15/2024	Jennifer Bybee	1.1	\$925	\$1,018	Create redline edit of draft motion to certify issue for interlocutory appeal	Other Motions
8/15/2024	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re draft of motion to certify issue for interlocutory appeal	Other Motions
8/15/2024	Jennifer Bybee	1.0	\$925	\$925	Conduct final review of motion to certify issue for interlocutory review	Other Motions
8/15/2024	Mark Johnson	0.2	\$1,150	\$230	com w/ A Spiegel re pre-trial schedule and make revisions to same	Case Organization, Planning and Strategy
8/15/2024	Mark Johnson	0.1	\$1,150	\$115	Call w/ TCC re Cross deposition logistics and prep	Depositions
8/15/2024	Mark Johnson	0.1	\$1,150	\$115	call w/ GBW re contract labor invoice production by Ds and volume and ramifications of same.	Discovery (Non-Deposition)
8/15/2024	Mark Johnson	0.7	\$1,150	\$805	review productions of contract labor invoices and prior emails and summaries re same; calculate number of documents and pages and identify bates ranges	Discovery (Non-Deposition)
8/15/2024	Mark Johnson	0.6	\$1,150	\$690	email exchanges w/ GBW and J Thornton re results of analysis of contract labor invoice review; strategy for addressing late document production.	Discovery (Non-Deposition)
8/15/2024	Mark Johnson	2.6	\$1,150	\$2,990	work on revisions to Mastin and Waters rebuttal expert reports, coms w/ Wallace, Mastin, Waters re same.	Experts (Including Retention)
8/15/2024	Mark Johnson	0.8	\$1,150	\$920	review Flores supplemental rebuttal report and attachments	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/15/2024	Mark Johnson	0.2	\$1,150	\$230	final com w/ GBW re Mastin/Waters rebuttal reports; draft email to OC conveying same.	Experts (Including Retention)
8/15/2024	Mark Johnson	1.0	\$1,150	\$1,150	download D expert reports, preliminary review of Anderson an Allen reports and Anderson spreadsheets; emails w/ OC, COC and staff re same	Experts (Including Retention)
8/15/2024	Mark Johnson	1.5	\$1,150	\$1,725	re-work draft admin mtn for extension of time to oppose class decert mtn.	Other Motions
8/15/2024	Mark Johnson	0.6	\$1,150	\$690	review and make final edits to mtn to extend deadline for opposing subclass decert mtn, supporting declaration and proposed order, emails w/ TCC, LEC re same and filing.	Other Motions
8/15/2024	Mark Johnson	0.2	\$1,150	\$230	Final review and sign off on admin mtn to extend time for opp to class decert mtn	Other Motions
8/15/2024	Rachel Steyer	1.5	\$750	\$1,125	attempted class outreach, leaving Vms, updating notes in spreadsheet	Class Outreach and Contact
8/15/2024	Rachel Steyer	0.2	\$750	\$150	spoke w/family member of resident, agreed to follow up next week	Class Outreach and Contact
8/15/2024	Rachel Steyer	3.7	\$750	\$2,775	further review of production and updating discovery spreadsheet	Discovery (Non-Deposition)
8/15/2024	Rachel Steyer	0.3	\$750	\$225	proofreading expert rebuttal report	Experts (Including Retention)
8/15/2024	Travis Close	1.2	\$850	\$1,020	Draft declaration of TCC iso plaintiffs' admin motion for extension of time to respond to defendants' motion for decertification	Case Organization, Planning and Strategy
8/15/2024	Travis Close	0.8	\$850	\$680	Draft proposed order on plaintiffs' admin motion for extension of time to respond to defendants' motion for decertification	Case Organization, Planning and Strategy
8/15/2024	Travis Close	0.2	\$850	\$170	Review and analyze draft amended responses to Defendants' third set of requests for production	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/15/2024	Travis Close	1.2	\$850	\$1,020	Review, analyze, and propose revisions to draft rebuttal expert reports by Gary Waters and Jeff Mastin	Case Organization, Planning and Strategy
8/15/2024	Travis Close	0.4	\$850	\$340	Review and analyze motion to certify order for interlocutory appeal (as filed)	Case Organization, Planning and Strategy
8/15/2024	Travis Close	0.5	\$850	\$425	Further edits to proposed order & TCC declaration in support of admin motion to extend time, per MTJ/GBW comments	Case Organization, Planning and Strategy
8/15/2024	Travis Close	0.4	\$850	\$340	Final review & proofing of admin motion to extend time to respond to motion to decertify the access barrier subclasses & supporting declaration, proposed order	Case Organization, Planning and Strategy
8/15/2024	Travis Close	0.5	\$850	\$425	Call with MTJ re: schedule and timeline for preparing for Doug Cross deposition	Depositions
8/15/2024	Travis Close	0.6	\$850	\$510	Review, analyze, revise draft admin motion to extend time to file opposition to decert motion based on edits by MTJ	Other Motions
8/16/2024	Guy Wallace	0.3	\$1,350	\$405	com's with RLS re potential substitute class representatives for Brookhurst	Class Certification
8/16/2024	Guy Wallace	0.7	\$1,350	\$945	com's with ER; Bertino; MTJ re deposition schedule	Depositions
8/16/2024	Guy Wallace	1.8	\$1,350	\$2,430	review and analysis of rebuttal report of Anderson; facilities reports re same	Experts (Including Retention)
8/16/2024	Guy Wallace	0.6	\$1,350	\$810	review and analysis of rebuttal expert reports of Allen; Baird; com's with JGT; BU re same	Experts (Including Retention)
8/16/2024	Guy Wallace	1.3	\$1,350	\$1,755	com's with GG; AS; BU; MTJ; TCC; RLS re Defendants' expert rebuttal reports; trial preparation and schedule re same	Experts (Including Retention)
8/16/2024	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of expert declarations of Anderson	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/16/2024	Guy Wallace	1.1	\$1,350	\$1,485	com's with Waters; Mastin re expert rebuttal report of Anderson; analysis of implications for dispositive motions	Experts (Including Retention)
8/16/2024	Guy Wallace	1.5	\$1,350	\$2,025	review and analysis of pretrial schedule; settlement schedule; com's with JY; AS; MTJ re same	Misc. Research
8/16/2024	Mark Johnson	0.4	\$1,150	\$460	download and quick review of D's responses to contention rogs re access barriers and responses to 14th set of document requests, com w/ COC re same	Discovery (Non-Deposition)
8/16/2024	Mark Johnson	0.5	\$1,150	\$575	call w/ GBW re Anderson expert reports and D responses to contention rogs, scoping issues, Blair rebuttal report, rescheduling Mastin depo, depo prep	Experts (Including Retention)
8/16/2024	Mark Johnson	0.2	\$1,150	\$230	call w/ Mastin re Anderson report, depo prep, rescheduling deposition	Experts (Including Retention)
8/16/2024	Mark Johnson	0.1	\$1,150	\$115	email exchanges w/ OC re Mastin depo scheduling	Experts (Including Retention)
8/16/2024	Mark Johnson	1.3	\$1,150	\$1,495	team zoom mtg w/ A Spiegel, D Edmundson, R Steyer, G Grunfeld, G Wallace, B Umpierre, T Close re expert reports, depositions, motions, trial prep	Trial and Pretrial Preparation
8/16/2024	Rachel Steyer	1.3	\$750	\$975	weekly zoom with co-counsel, MTJ, GBW, TCC to review and discuss ongoing tasks and assignments	Case Organization, Planning and Strategy
8/16/2024	Rachel Steyer	1.5	\$750	\$1,125	attempted class outreach, leaving VMs, updating and reviewing notes in spreadsheet	Class Outreach and Contact
8/16/2024	Rachel Steyer	0.2	\$750	\$150	call with GBW re call with Lori Eddy	Class Outreach and Contact
8/16/2024	Rachel Steyer	2.0	\$750	\$1,500	reviewing and updating master discovery index spreadsheet	Discovery (Non-Deposition)
8/16/2024	Rachel Steyer	0.4	\$750	\$300	reviewing defendants' supplemental ROG responses	Discovery (Non-Deposition)
8/16/2024	Travis Close	0.2	\$850	\$170	Email to MTJ re: question about brookdale's transportation rebuttal expert	Case Organization, Planning and Strategy
8/16/2024	Travis Close	1.4	\$850	\$1,190	Review and analyze deposition transcript of Kelly Rubin & exhibits therein	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/16/2024	Travis Close	0.9	\$850	\$765	Research how the california division of state architect defines/construes assisted living facilities	Case Organization, Planning and Strategy
8/16/2024	Travis Close	0.2	\$850	\$170	Email to ESI requests re: transportation docs for packaging to send to Douglas Cross	Case Organization, Planning and Strategy
8/16/2024	Travis Close	1.3	\$850	\$1,105	Call with Douglas Cross re: depo preparation (preparing schedule, reviewing standards on opinions, review procedure for deposition)	Case Organization, Planning and Strategy
8/16/2024	Travis Close	0.8	\$850	\$680	Call with JIK re: discuss upcoming preparation plans for deposition	Depositions
8/16/2024	Travis Close	1.4	\$850	\$1,190	Further review, analyze, and prioritization of newer documents for Douglas Cross to prepare for deposition	Depositions
8/17/2024	Guy Wallace	1.4	\$1,350	\$1,890	review and analysis of Anderson report and Exhibit from DSA; com's with Waters; Mastin; MTJ; RAB re coverage and occupancy issues	Experts (Including Retention)
8/17/2024	Mark Johnson	0.7	\$1,150	\$805	calls x2 w/ GBW re expert report re access and scoping / coverage issues, planning for mtg w our experts.	Experts (Including Retention)
8/17/2024	Mark Johnson	0.4	\$1,150	\$460	email coms w/ GBW, Mastin and Waters re Anderson report, scoping and coverage issues	Experts (Including Retention)
8/18/2024	Mark Johnson	3.7	\$1,150	\$4,255	review and analysis of Anderson expert rebuttal report re coverage and scoping; review San Ramon spreadsheet and isolate disputed / non-disputed barriers and common areas / rooms and analyze same; email to COC and experts re results; pull and circulate additional expert reports.	Experts (Including Retention)
8/19/2024	Guy Wallace	2.3	\$1,350	\$3,105	preparation for depositions of Waters and Mastin; review and analysis of Anderson report	Depositions
8/19/2024	Guy Wallace	5.4	\$1,350	\$7,290	conf with Waters; Mastin; MTJ re Anderson report and deposition preparation	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/19/2024	Mark Johnson	1.5	\$1,150	\$1,725	further review of Anderson rebuttal report and related materials and prepare notes for Anderson depo	Depositions
8/19/2024	Mark Johnson	6.5	\$1,150	\$7,475	meeting w/ GBW, J Mastin, G Waters to discuss depo prep and analysis of, responses to Anderson Rebuttal report.	Experts (Including Retention)
8/19/2024	Mark Johnson	0.7	\$1,150	\$805	prep for mtg w/ Mastin, Waters, coms w/ LEC re documents for same	Experts (Including Retention)
8/19/2024	Mark Johnson	1.5	\$1,150	\$1,725	Review and analysis of Anderson Scotts Valley spreadsheet, prepare additional sheets isolating categories; draft email to COC and Mastin, Waters re same.	Experts (Including Retention)
8/19/2024	Rachel Steyer	6.9	\$750	\$5,175	working on preparing updated barriers chart	Other Motions
8/19/2024	Travis Close	0.8	\$850	\$680	Legal research on guidance by the Division of State Architect on room accessibility requirements for assisted living facilities	Case Organization, Planning and Strategy
8/19/2024	Travis Close	1.3	\$850	\$1,105	Research distinction between R.1 / I-1 and I-2 occupancy requirements in IBC vs. CBC versions	Case Organization, Planning and Strategy
8/19/2024	Travis Close	1.7	\$850	\$1,445	Draft outline & points of focus to assist June Kailes in review of latest batch of emergency evacuation documents	Case Organization, Planning and Strategy
8/19/2024	Travis Close	0.2	\$850	\$170	Email to JIK re: latest batch of emergency planning documents for review	Case Organization, Planning and Strategy
8/19/2024	Travis Close	0.4	\$850	\$340	research proposed and final rulemaking for issues of mandatory transfers	Case Organization, Planning and Strategy
8/19/2024	Travis Close	0.2	\$850	\$170	Email to Doug Cross re: three sections from federal register cited in rule 26 report	Case Organization, Planning and Strategy
8/19/2024	Travis Close	0.4	\$850	\$340	Research parcel history for Brookdale Scotts Valley on Santa Cruz County website	Discovery (Non-Deposition)
8/19/2024	Travis Close	1.3	\$850	\$1,105	Review, analyze, and organize additional production of emergency-evacuation related emails	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/19/2024	Travis Close	0.7	\$850	\$595	Review and analyze expert rebuttal report of Jacobsen	Experts (Including Retention)
8/19/2024	Travis Close	0.8	\$850	\$680	Review and analyze expert rebuttal report of Anderson & additional materials	Experts (Including Retention)
8/19/2024	Travis Close	0.4	\$850	\$340	Review and analyze expert rebuttal report of Julie Baird	Experts (Including Retention)
8/19/2024	Travis Close	0.5	\$850	\$425	Call with Doug Cross re: questions about new docs recently produced by defendants	Experts (Including Retention)
8/20/2024	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ; TCC re construction history re San Ramon and Scotts Valley facilities; type of occupancy and change of use	Depositions
8/20/2024	Guy Wallace	0.3	\$1,350	\$405	com's with JGT; MTJ re 21 tables re benchmark code	Discovery (Non-Deposition)
8/20/2024	Guy Wallace	0.5	\$1,350	\$675	com's with Waters re ADA and long term care facilities; preparation for deposition	Experts (Including Retention)
8/20/2024	Guy Wallace	1.0	\$1,350	\$1,350	com's with Waters; Mastin re construction history of San Ramon and Scotts Valley facilities; occupancy and type of use	Experts (Including Retention)
8/20/2024	Guy Wallace	1.4	\$1,350	\$1,890	review and analysis of 4AC re Unruh Act claims and sufficiency re access allegations; legal research and analysis re same	Motion for Summary Judgment / Adjudicaiton
8/20/2024	Guy Wallace	1.3	\$1,350	\$1,755	legal research and analysis re twelve categories of accommodations covered by Title III; examples are illustrative, not exhaustive; com's with MTJ re same; review and analysis of DOJ 1991 interpretative guidance re same	Motion for Summary Judgment / Adjudicaiton
8/20/2024	Guy Wallace	0.9	\$1,350	\$1,215	zoom with BBK; MTJ re preparation of PSJ re sections re common area barriers	Motion for Summary Judgment / Adjudicaiton
8/20/2024	Mark Johnson	3.5	\$1,150	\$4,025	review and analyze Anderson rebuttal report and related materials to break down and formulate response to arguments; notes for depo prep for Anderson, identify exhibits.	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/20/2024	Mark Johnson	1.1	\$1,150	\$1,265	analysis of Brookdale Brookhurst annotated report from Anderson materials for disputed/undisputed barriers in common areas and units. com w/ COC and experts re same	Experts (Including Retention)
8/20/2024	Mark Johnson	1.8	\$1,150	\$2,070	review and analyze 1985 and 1998 CBC for Group I occupancy definitions and accessibilty requirements; com w/ COC re same.	Experts (Including Retention)
8/20/2024	Mark Johnson	0.5	\$1,150	\$575	mtg w/ J Mastin to walk through arguments re scoping and coverage under CBC.	Experts (Including Retention)
8/20/2024	Mark Johnson	0.7	\$1,150	\$805	call w/ GBW, BBK re partial mtn for summary judgment and review of Anderson response to barrier reports for same.	Motion for Summary Judgment / Adjudicaiton
8/20/2024	Rachel Steyer	1.9	\$750	\$1,425	attempted class outreach, leaving VMs, updating and reviewing notes in spreadsheet	Class Outreach and Contact
8/20/2024	Rachel Steyer	0.2	\$750	\$150	spoke w/sister of resident, said she'd check with her and follow up	Class Outreach and Contact
8/20/2024	Rachel Steyer	2.2	\$750	\$1,650	reviewing/comparing notes from different outreach lists, updating spreadshseets	Class Outreach and Contact
8/20/2024	Travis Close	0.2	\$850	\$170	Email to Jeff Mastin re: change of use assignment for six plaintiffs' facilities	Case Organization, Planning and Strategy
8/20/2024	Travis Close	0.2	\$850	\$170	Email to architectural experts re: assistance with facility building records research	Case Organization, Planning and Strategy
8/20/2024	Travis Close	0.3	\$850	\$255	Emails to Doug Cross & Accounts Payable re: errors made for invoicing/payments	Case Organization, Planning and Strategy
8/20/2024	Travis Close	1.3	\$850	\$1,105	Analyze building records for evidence indicating change of use for San Ramon facility	Case Organization, Planning and Strategy
8/20/2024	Travis Close	1.2	\$850	\$1,020	Analyze building records for evidence indicating change of use for Scotts Valley facility	Case Organization, Planning and Strategy
8/20/2024	Travis Close	1.4	\$850	\$1,190	Begin drafting outline for douglas cross deposition	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/20/2024	Travis Close	2.6	\$850	\$2,210	Video conference with Douglas Cross -- deposition preparation session No. 1	Depositions
8/20/2024	Travis Close	1.3	\$850	\$1,105	Analyze building permit records for change of use history to assisted living for Brookdale Tracy	Discovery (Non-Deposition)
8/21/2024	Guy Wallace	1.1	\$1,350	\$1,485	legal research and analysis re impracticability of joinder and future class members; Defendants' argument re numerosity	Class Certification
8/21/2024	Guy Wallace	1.1	\$1,350	\$1,485	com's with MTJ re Anderson deposition and Defendants' document production from May 2024 to present	Discovery (Non-Deposition)
8/21/2024	Guy Wallace	0.7	\$1,350	\$945	com's with Waters re Anderson report and response thereto; cases cited by J. Gilliam in order re Defendants' motion to dismiss re Title III coverage	Experts (Including Retention)
8/21/2024	Guy Wallace	0.4	\$1,350	\$540	com's with Waters; Mastin re coverage and occupancy issues	Experts (Including Retention)
8/21/2024	Guy Wallace	1.4	\$1,350	\$1,890	review and analysis of list from BBK re potential common area barriers to include in PSJ; com's with BBK; MTJ re same	Motion for Summary Judgment / Adjudicaiton
8/21/2024	Guy Wallace	0.7	\$1,350	\$945	review and analysis of potential barriers list for PSJ re San Ramon; revise and edit same; com's with BBK; MTJ re same	Motion for Summary Judgment / Adjudicaiton
8/21/2024	Guy Wallace	0.9	\$1,350	\$1,215	com's with MTJ re potential further motions to compel	Other Motions
8/21/2024	Guy Wallace	2.8	\$1,350	\$3,780	review and analysis of Defendants' motion for decertification; legal research and analysis re same; com's with JAU re same (.4)	Other Motions
8/21/2024	Mark Johnson	0.8	\$1,150	\$920	Calls w/ GBW (x4) re analysis of D recent document production, potential discovery motions, analysis of Anderson annotated reports	Case Organization, Planning and Strategy
8/21/2024	Mark Johnson	0.2	\$1,150	\$230	coms w/ BBK, GBW re Omole depo; draft email to Omole counsel re availability	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/21/2024	Mark Johnson	0.1	\$1,150	\$115	com w/ TCC re Cross depo; review email exchange re same	Depositions
8/21/2024	Mark Johnson	0.5	\$1,150	\$575	Call w/ Jim Thornton re benchmark source code follow up.	Discovery (Non-Deposition)
8/21/2024	Mark Johnson	1.6	\$1,150	\$1,840	review and analyze spreadsheet of D recent document production; prepare memo re date distribution	Discovery (Non-Deposition)
8/21/2024	Mark Johnson	0.3	\$1,150	\$345	draft email to OC re benchmark source code and tables, confer w/ GBW re same	Discovery (Non-Deposition)
8/21/2024	Mark Johnson	1.2	\$1,150	\$1,380	review and compare Anderson annotated report for Brookdale and compare with original Mastin report; draft memo re differences and Anderson methodology.	Experts (Including Retention)
8/21/2024	Mark Johnson	0.4	\$1,150	\$460	review BBK lists of undisputed items for SV and SR facilities and GBW comments on same	Motion for Summary Judgment / Adjudication
8/21/2024	Travis Close	1.4	\$850	\$1,190	Continue drafting deposition outline for Douglas Cross (securement, trainings)	Case Organization, Planning and Strategy
8/21/2024	Travis Close	0.4	\$850	\$340	Review and analyze undisputed/disputed barrier lists for Fountaingrove and Brookhurst	Case Organization, Planning and Strategy
8/21/2024	Travis Close	0.4	\$850	\$340	Emails to opposing counsel re: time conflict for Cross deposition notice	Case Organization, Planning and Strategy
8/21/2024	Travis Close	0.7	\$850	\$595	Review and analyze admission records, residency agreement, other docs in file for William Christensen (FSP complainant)	Case Organization, Planning and Strategy
8/21/2024	Travis Close	0.7	\$850	\$595	Review and analyze records of correspondence for Dave & Barbara Berger (scooter users)	Case Organization, Planning and Strategy
8/21/2024	Travis Close	2.3	\$850	\$1,955	Cross depo prep - Begin drafting summary chart of complaints from residents, plaintiffs, class members	Depositions
8/21/2024	Travis Close	1.2	\$850	\$1,020	depo prep - Draft prioritized list of docs/materials for review for Doug Cross	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/22/2024	Guy Wallace	3.1	\$1,350	\$4,185	review and analysis of Defendants' motion for decertification; com's with JAU re same; legal research and analysis re standard for decertification, Defendants' reliance on Dukes v. Wal-Mart and Costco decisions and responses thereto	Class Certification
8/22/2024	Guy Wallace	0.9	\$1,350	\$1,215	com's with MTJ; RLS; RAB re document analysis and Defendants' production of documents since May 1, 2024	Discovery (Non-Deposition)
8/22/2024	Guy Wallace	1.3	\$1,350	\$1,755	review and analysis of expert rebuttal reports of Baird; Saad; Jacobson; com's with BU; MTJ re same (.4)	Experts (Including Retention)
8/22/2024	Guy Wallace	0.7	\$1,350	\$945	review and analysis of barriers list for summary adjudication re Brookhurst; com's with BBK; MTJ re same	Motion for Summary Judgment / Adjudication
8/22/2024	Jennifer Bybee	0.7	\$925	\$648	Review Motion to Decertify and Opposition to Motion for Class Cert and email GBW re same	Class Certification
8/22/2024	Jennifer Bybee	0.2	\$925	\$185	Review Motion to Decertify Class and email GBW re same	Class Certification
8/22/2024	Jennifer Bybee	2.0	\$925	\$1,850	Review cases cited in Defendant's Motion to Decertify to see if any contradict Olean	Class Certification
8/22/2024	Jennifer Bybee	0.2	\$925	\$185	Review motion to clarify FSP subclass definition	Class Certification
8/22/2024	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re motion for clarification and motion for decertification	Class Certification
8/22/2024	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re cases cited in Mtn to Decertify	Class Certification
8/22/2024	Mark Johnson	3.0	\$1,150	\$3,450	work on depo outline and exhibit identification for Omole depo	Depositions
8/22/2024	Mark Johnson	0.8	\$1,150	\$920	video conference w/ RAB, RLS and GBW re status of document review and strategy for completion	Discovery (Non-Deposition)
8/22/2024	Mark Johnson	3.5	\$1,150	\$4,025	work on outline of response to Anderson expert rebuttal report	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/22/2024	Rachel Steyer	0.2	\$750	\$150	spoke w/current resident, discussed case, set up follow up call	Class Certification
8/22/2024	Rachel Steyer	1.6	\$750	\$1,200	attempting class outreach, leaving VMs, updating and review notes in spreadsheet	Class Outreach and Contact
8/22/2024	Rachel Steyer	0.2	\$750	\$150	call with daughter and son-in-law of resident, no FSP issues	Class Outreach and Contact
8/22/2024	Rachel Steyer	0.2	\$750	\$150	spoke w/family member of resident, no FSP issues	Class Outreach and Contact
8/22/2024	Rachel Steyer	0.5	\$750	\$375	reviewing spreadsheet for docs produced and dates analysis	Discovery (Non-Deposition)
8/22/2024	Rachel Steyer	0.8	\$750	\$600	meeting with GBW, MTJ, RAB re review of docs	Discovery (Non-Deposition)
8/22/2024	Rachel Steyer	3.1	\$750	\$2,325	reviewing and gathering docs for MTJ for Omole depo	Discovery (Non-Deposition)
8/22/2024	Travis Close	0.3	\$850	\$255	Email to Doug Cross re: today's conference call, depo prep strategy, docs to review	Case Organization, Planning and Strategy
8/22/2024	Travis Close	1.4	\$850	\$1,190	continue drafting index of complaints & inquiries from class members & others affected by the fleet safety policy prohibitions	Case Organization, Planning and Strategy
8/22/2024	Travis Close	0.2	\$850	\$170	Email to MTJ re: assignment for Omole deposition	Case Organization, Planning and Strategy
8/22/2024	Travis Close	1.3	\$850	\$1,105	Review and analyze correspondence, complaints, residency agreement, & other documents on file for complainant Priscilla Gamst (FSP/scooters)	Depositions
8/22/2024	Travis Close	0.8	\$850	\$680	Review and analyze correspondence, complaints, residency agreement, & other documents on file for complainant Mary / Fresno facility (FSP/scooters)	Depositions
8/22/2024	Travis Close	2.7	\$850	\$2,295	Depo prep session # 2 - Doug Cross - video conference	Depositions
8/22/2024	Travis Close	0.8	\$850	\$680	Review and analyze correspondence, complaints, residency agreement, & other documents on file for complainant Jane Brown (FSP/scooters)	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/22/2024	Travis Close	0.4	\$850	\$340	Prep for call with June Kailes (review previous notes/correspondence)	Experts (Including Retention)
8/22/2024	Travis Close	0.9	\$850	\$765	Call with June Kailes re: docs to focus review on for depo prep, discuss trial strategy	Experts (Including Retention)
8/23/2024	Guy Wallace	2.4	\$1,350	\$3,240	preparation of initial outline of opposition to Defendants' motion for decertification	Class Certification
8/23/2024	Guy Wallace	0.4	\$1,350	\$540	com's with JAU re preparation of opposition to motion for decertification; analysis of updated barriers list	Class Certification
8/23/2024	Guy Wallace	0.9	\$1,350	\$1,215	com's with Waters re services of a medical nature provided by Brookdale in its assisted living facilities; review and analysis of Health Well Director Manual, Chapter 2	Experts (Including Retention)
8/23/2024	Guy Wallace	0.8	\$1,350	\$1,080	com's with BU; RLS re services provided to residents of its assisted living facilities by Brookdale that are medical in nature	Motion for Summary Judgment / Adjudicaiton
8/23/2024	Guy Wallace	1.2	\$1,350	\$1,620	prepare for and participate in zoom with JY; BBK; AS; BU; MTJ; KS re preparation of Plaintiffs' motion for partial summary judgment and discovery issues	Motion for Summary Judgment / Adjudicaiton
8/23/2024	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of list of barriers to include re PSJ re Fountaingrove; com's with BBK; MTJ re same	Other Motions
8/23/2024	Guy Wallace	0.4	\$1,350	\$540	review and analysis of nature of barriers in common areas; com's with BBK; MTJ re narrowing same re PSJ and for trial purposes	Trial and Pretrial Preparation
8/23/2024	Jennifer Bybee	0.1	\$925	\$93	Review email com's from GBW re Gilliam's discussion of standing	Class Certification
8/23/2024	Jennifer Bybee	0.4	\$925	\$370	Review Pileggi v . Wells Fargo and email GBW re same	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/23/2024	Mark Johnson	1.0	\$1,150	\$1,150	team zoom mtg w/ Wallace, Yelin, Bien-Kahn, Umpierre, Steyer, Stilber, Edmundson, Close re partial summary judgment, Omole depo, discovery motions, expert depositions	Case Organization, Planning and Strategy
8/23/2024	Mark Johnson	0.6	\$1,150	\$690	calls (x4) w/ GBW re analysis of Anderson rebuttal report and responses to arguments, timing of supplemental Mastin and Waters reports, class decert motion, trial prep and schedule	Case Organization, Planning and Strategy
8/23/2024	Mark Johnson	0.3	\$1,150	\$345	coms w/ T Close and R Steyer re exhibits for Omole depo	Depositions
8/23/2024	Mark Johnson	0.2	\$1,150	\$230	coms w/ B Umpierre re Josh Allen depo and depo notice, review notice	Depositions
8/23/2024	Mark Johnson	0.3	\$1,150	\$345	review new set of exhibits gathered for Omole depo	Depositions
8/23/2024	Mark Johnson	0.2	\$1,150	\$230	email exchanges w/ OC re expert depositions, extension of time re source code motion	Discovery (Non-Deposition)
8/23/2024	Mark Johnson	0.2	\$1,150	\$230	call w/ Loi Thai at DSA re policy update 98-04	Experts (Including Retention)
8/23/2024	Mark Johnson	0.2	\$1,150	\$230	email coms /w G Waters re Anderson annotated reports and analysis, San Ramon report	Experts (Including Retention)
8/23/2024	Mark Johnson	3.5	\$1,150	\$4,025	work on outline of responses to Anderson arguments in rebuttal report	Experts (Including Retention)
8/23/2024	Mark Johnson	1.0	\$1,150	\$1,150	continue drafting outline of responses to Anderson arguments on access in rebuttal report.	Experts (Including Retention)
8/23/2024	Rachel Steyer	1.0	\$750	\$750	weekly zoom with RBGG, BSU, GBW, MTJ, TCC re ongoing tasks and assignments	Case Organization, Planning and Strategy
8/23/2024	Rachel Steyer	0.5	\$750	\$375	follow up call with POA of former resident, discussed case and next steps	Class Outreach and Contact
8/23/2024	Rachel Steyer	0.2	\$750	\$150	preparing and sending mailer to resident representative per request	Class Outreach and Contact
8/23/2024	Rachel Steyer	0.4	\$750	\$300	call with Lori Eddy re serving as potential witness	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/23/2024	Rachel Steyer	0.9	\$750	\$675	reviewing and gathering additional docs for Omole depo	Depositions
8/23/2024	Rachel Steyer	0.2	\$750	\$150	response to MTJ, GBW, TCC, LEC, RAB re gathering docs for Omole depo	Depositions
8/23/2024	Rachel Steyer	0.4	\$750	\$300	organizing and downloading PLTF invoices for Omole depo prep	Depositions
8/23/2024	Rachel Steyer	0.3	\$750	\$225	call with RAB to review and discuss production and searches	Discovery (Non-Deposition)
8/23/2024	Rachel Steyer	0.7	\$750	\$525	reviewing documents/record for evidence of medicalization of services	Discovery (Non-Deposition)
8/23/2024	Rachel Steyer	2.8	\$750	\$2,100	reviewing and updating recent productions	Discovery (Non-Deposition)
8/23/2024	Rachel Steyer	0.2	\$750	\$150	email to RBGG, MTJ, GBW, and TCC re medical services evidence in record	Discovery (Non-Deposition)
8/23/2024	Travis Close	1.5	\$850	\$1,275	Akindale Omole depo prep -- collect, review, and analyze all emergency evacuation & disaster-related documents in effect for the San Ramon facility during Omole's tenure	Case Organization, Planning and Strategy
8/23/2024	Travis Close	1.0	\$850	\$850	Team meeting with MTJ, GBW, and co-counsel re: motion for summary judgement and strategy for upcoming depositions	Case Organization, Planning and Strategy
8/23/2024	Travis Close	1.3	\$850	\$1,105	Continue drafting chart of summary complaints regarding the electric wheelchair/scooter prohibition in the Fleet Safety Policy	Case Organization, Planning and Strategy
8/23/2024	Travis Close	0.7	\$850	\$595	Review and analyze correspondence, other files on record by issue register complainant Carolyn Downey re: Fleet Safety Policy	Case Organization, Planning and Strategy
8/23/2024	Travis Close	0.7	\$850	\$595	Review and analyze files on record & other correspondance from Issue Register complainant Meighan Howard regarding the Fleet Safety Policy & other transportation issue	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/23/2024	Travis Close	0.2	\$850	\$170	Emails to JIK re: different versions of expert report & exhibits needed	Case Organization, Planning and Strategy
8/23/2024	Travis Close	0.2	\$850	\$170	Email to doug cross re: index of complaints regarding the fleet safety policy	Case Organization, Planning and Strategy
8/23/2024	Travis Close	0.4	\$850	\$340	Draft list of testimony and depositions for Douglas Cross	Case Organization, Planning and Strategy
8/23/2024	Travis Close	1.3	\$850	\$1,105	Omole depo prep -- collect, review, and analyze fleet safety policies & related transportation policies in effect during his tenure at San Ramon, as well as associated emails re same	Depositions
8/23/2024	Travis Close	0.8	\$850	\$680	Omole depo prep -- collect, review, and analyze DSS facility evaluation & complaint investigation reports issued during his tenure	Depositions
8/24/2024	Guy Wallace	1.1	\$1,350	\$1,485	revise and edit draft of supplemental points re coverage under ADA and ADAAG, occupancy, usage issues under CBC	Experts (Including Retention)
8/24/2024	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of common areas for Hemet; revise and edit barriers re same; com's with BBK re same	Motion for Summary Judgment / Adjudication
8/24/2024	Mark Johnson	3.0	\$1,150	\$3,450	work on outline of responses to Anderson rebuttal expert report	Experts (Including Retention)
8/25/2024	Guy Wallace	0.6	\$1,350	\$810	legal research and analysis re impracticability of joinder and future class members	Class Certification
8/25/2024	Guy Wallace	2.3	\$1,350	\$3,105	legal research and analysis re Defendants' motion for decertification; impracticability of joinder and inclusion of future class members and argument re same	Class Certification
8/25/2024	Guy Wallace	1.8	\$1,350	\$2,430	preparation of outline of opposition to Defendants' motion for decertification	Class Certification
8/25/2024	Guy Wallace	0.7	\$1,350	\$945	legal research and analysis re Olean and footnote 32 and subsequent district court readings of same	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/25/2024	Guy Wallace	1.3	\$1,350	\$1,755	review and analysis of draft from MTJ re issues re access standards, scoping and occupancy issues under CBC	Experts (Including Retention)
8/25/2024	Guy Wallace	0.5	\$1,350	\$675	com's with Waters re alterations history re Scotts Valley and issues re occupancy	Experts (Including Retention)
8/25/2024	Guy Wallace	0.8	\$1,350	\$1,080	legal research and analysis re alterations standard under CA law and under the ADA and ADAAG	Experts (Including Retention)
8/25/2024	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ re occupancy and use of Brookdale facilities; coverage under Section 6 of the ADAAG	Experts (Including Retention)
8/25/2024	Mark Johnson	2.0	\$1,150	\$2,300	revise outline of issues/responses to Anderson rebuttal report and send to Mastin, Waters, prepare and partially complete template of chart of disputed barriers and send to Mastin / Waters	Experts (Including Retention)
8/25/2024	Mark Johnson	1.1	\$1,150	\$1,265	calls (x4) w/ GBW re issues on summary judgment motion, decert opposition, analysis of Anderson arguments in rebuttal report	Other Motions
8/26/2024	Guy Wallace	1.3	\$1,350	\$1,755	preparation of outline of points and argument for opposition to decert motion	Class Certification
8/26/2024	Guy Wallace	2.4	\$1,350	\$3,240	preparation of detailed outline of opposition to motion for decertification	Class Certification
8/26/2024	Guy Wallace	0.5	\$1,350	\$675	analysis of issue of history of occupancy and type of use at San Ramon and Scotts Valley	Experts (Including Retention)
8/26/2024	Guy Wallace	1.2	\$1,350	\$1,620	com's with MTJ re requirements of 1985 and 1989 CBC and Group I occupancies	Experts (Including Retention)
8/26/2024	Guy Wallace	2.0	\$1,350	\$2,700	zoom with Waters; Mastin; MTJ re preparation for deposition; construction history of San Ramon and Scotts Valley facilities	Experts (Including Retention)
8/26/2024	Guy Wallace	0.8	\$1,350	\$1,080	legal research and analysis re approval of plans or certificates of occupancy by building officials; de novo review by district courts of same	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/26/2024	Mark Johnson	2.0	\$1,150	\$2,300	video conference w/ Mastin, Waters, Wallace re depo prep, scoping analysis, responses to Anderson positions, disputed barriers,	Depositions
8/26/2024	Mark Johnson	0.9	\$1,150	\$1,035	calls (x4) re issues raised in Anderson rebuttal report, analysis of scoping issues under CBC, expert supplemental reports,	Experts (Including Retention)
8/26/2024	Mark Johnson	2.3	\$1,150	\$2,645	review construction history docs for Scotts Valley, prepare notes re same, email to Mastin, Waters, Wallace re same.	Experts (Including Retention)
8/26/2024	Mark Johnson	0.2	\$1,150	\$230	coms w/ Waters, Mastin re San Ramon units in 2 buildings, review docs to obtain info re same.	Experts (Including Retention)
8/26/2024	Mark Johnson	1.6	\$1,150	\$1,840	review 85, 89, 95 and 98 CBC and prepare chart of provisions governing Group I occupancies and access requirements	Experts (Including Retention)
8/26/2024	Mark Johnson	1.2	\$1,150	\$1,380	further review of Anderson annotated reports for disputed barriers for Scotts Valley and San Ramon. revise chart to add information on same	Experts (Including Retention)
8/26/2024	Mark Johnson	0.4	\$1,150	\$460	calls (x2) re issues on class decert motion, arguments in opposition to same.	Other Motions
8/26/2024	Rachel Steyer	0.3	\$750	\$225	follow up call w/Terri Woodfolk, discussed transportation policy claims and access issues	Class Outreach and Contact
8/26/2024	Rachel Steyer	0.3	\$750	\$225	response to MTJ, TCC, RAB re Scotts Valley construction history	Discovery (Non-Deposition)
8/27/2024	Guy Wallace	1.7	\$1,350	\$2,295	preparation and drafting of opposition to motion for decertification	Class Certification
8/27/2024	Guy Wallace	1.3	\$1,350	\$1,755	preparation and drafting of opposition to Defendants' motion for decertification	Class Certification
8/27/2024	Guy Wallace	0.3	\$1,350	\$405	com's with RLS re Brookdale HWD Manual and analysis of testimony re same	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/27/2024	Guy Wallace	1.1	\$1,350	\$1,485	com's with Waters re deposition preparation and supplemental expert report	Experts (Including Retention)
8/27/2024	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ re construction history; San Ramon Building B; supplemental expert report of Waters	Experts (Including Retention)
8/27/2024	Guy Wallace	1.2	\$1,350	\$1,620	review and analysis of drafts of supplemental expert report of Waters	Experts (Including Retention)
8/27/2024	Guy Wallace	0.3	\$1,350	\$405	com's with PK; LP; MTJ re Kennedy deposition	Experts (Including Retention)
8/27/2024	Mark Johnson	0.2	\$1,150	\$230	follow up email coms w/ B Umpierre re scope of J Allen Depositions depo, conference w/ Dr. Flores re same.	Depositions
8/27/2024	Mark Johnson	0.4	\$1,150	\$460	Review email from Bertino re source code table; review same in Relativity; com w/ J Thornton re same and status of source code review; review list of tables and follow up com w/ Thornton	Discovery (Non-Deposition)
8/27/2024	Mark Johnson	0.2	\$1,150	\$230	email coms w/ TCC re review of Scotts Valley construction history; locate and send notes	Discovery (Non-Deposition)
8/27/2024	Mark Johnson	0.7	\$1,150	\$805	review G Waters partial draft supplemental report; coms w/ him re same.	Experts (Including Retention)
8/27/2024	Mark Johnson	0.4	\$1,150	\$460	call w/ T Close re review and analysis of Scotts Valley construction history, scheduling and strategy for Cross and Kailes depositions	Experts (Including Retention)
8/27/2024	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re theory on CBC application to Scotts Valley, San Ramon	Experts (Including Retention)
8/27/2024	Mark Johnson	1.0	\$1,150	\$1,150	review and analyze the Title III TAM re medical facilities, and long term care; draft email to G Waters, J Mastin and GBW re same	Experts (Including Retention)
8/27/2024	Mark Johnson	0.6	\$1,150	\$690	review Saad decl in opp to subclass certification mtn and transcript of hearing on same; review data produced in support of declaration; coms w/ GBW re same.	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/27/2024	Rachel Steyer	2.4	\$750	\$1,800	attempted class outreach, leaving VMs, updating and reviewing notes in spreadsheet	Class Outreach and Contact
8/27/2024	Rachel Steyer	0.2	\$750	\$150	call with son of former resident, no FSP or ADA issues	Class Outreach and Contact
8/27/2024	Rachel Steyer	0.2	\$750	\$150	spoke w/daughter of former resident, scheduled intake	Class Outreach and Contact
8/27/2024	Rachel Steyer	0.2	\$750	\$150	spoke w/son of former resident, no FSP issues	Class Outreach and Contact
8/27/2024	Rachel Steyer	0.3	\$750	\$225	follow up call w/son of former resident, discussed ADA barriers	Class Outreach and Contact
8/27/2024	Rachel Steyer	0.7	\$750	\$525	reviewing depo testimony re use of HWD resource manual	Depositions
8/27/2024	Rachel Steyer	1.8	\$750	\$1,350	further review and updating of spreadsheet tracking newer productions	Discovery (Non-Deposition)
8/27/2024	Rachel Steyer	0.3	\$750	\$225	reviewing memo/chart from RBGG re dimensional tolerances	Misc. Research
8/27/2024	Travis Close	0.3	\$850	\$255	Email to MTJ re: scotts valley redevelopment work circa 1998	Case Organization, Planning and Strategy
8/27/2024	Travis Close	0.6	\$850	\$510	Review and analyze notes by MTJ re: scotts valley redevelopment work circa 1996-98	Case Organization, Planning and Strategy
8/27/2024	Travis Close	0.4	\$850	\$340	Review and analyze recent facility evaluation and complaint investigation reports issued to Scotts Valley & Brookhurst facilities	Case Organization, Planning and Strategy
8/27/2024	Travis Close	0.7	\$850	\$595	Review, analyze, and collect selected construction history records from Hemet facility for Jeff Mastin	Case Organization, Planning and Strategy
8/27/2024	Travis Close	0.2	\$850	\$170	Email to ESI requests re: FTP upload needed for construction history records at four of plaintiffs' facilities	Case Organization, Planning and Strategy
8/27/2024	Travis Close	1.6	\$850	\$1,360	Isolate & organize building permits, permit applications, and letters from City of Scotts Valley pertaining to 1996-98 remodel plans	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/27/2024	Travis Close	0.3	\$850	\$255	Review and analyze updated memo by RBGG re: dimensional access tolerances for barriers in motion for summary judgment	Case Organization, Planning and Strategy
8/27/2024	Travis Close	0.2	\$850	\$170	Email to opposing counsel re: rescheduling dates for Douglas Cross deposition	Depositions
8/27/2024	Travis Close	0.2	\$850	\$170	Email to Doug Cross explaining deposition scheduling issues from defendants' side	Depositions
8/27/2024	Travis Close	1.4	\$850	\$1,190	Review, analyze, and collect construction history records associated with 1996-1998 remodels of Scotts Valley facility	Depositions
8/27/2024	Travis Close	0.5	\$850	\$425	Call with MTJ re: construction research needed for Scotts Valley & deposition scheduling	Depositions
8/27/2024	Travis Close	0.7	\$850	\$595	Call with Doug Cross re: depo scheduling logistics & possible changes	Depositions
8/27/2024	Travis Close	0.3	\$850	\$255	Review, analyze, and organize construction history records for Hemet facility for architectural experts' review/depo prep	Depositions
8/27/2024	Travis Close	0.7	\$850	\$595	Review, analyze, and organize construction history records for Fountaingrove facility	Depositions
8/27/2024	Travis Close	0.6	\$850	\$510	Review, analyze, and organize construction history records for Brookhurst facility	Discovery (Non-Deposition)
8/28/2024	Guy Wallace	4.1	\$1,350	\$5,535	preparation and drafting of opposition to Defendants' motion for decertification	Class Certification
8/28/2024	Guy Wallace	1.5	\$1,350	\$2,025	com's with Dr. Flores; JGT; BU; MTJ re issues regarding medical care and care at Brookdale facilities; population of residents with mobility disabilities; deposition of Josh Allen	Class Certification
8/28/2024	Guy Wallace	1.2	\$1,350	\$1,620	preparation and drafting of opposition to motion for decertification; sections re legal standard on decertification; joinder of future class members	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/28/2024	Guy Wallace	0.9	\$1,350	\$1,215	com's with Waters re supplemental report; review and analysis of draft of same; revise and edit same	Experts (Including Retention)
8/28/2024	Guy Wallace	0.9	\$1,350	\$1,215	revise and edit draft supplemental report of Waters; com's with Waters; MTJ re same	Experts (Including Retention)
8/28/2024	Guy Wallace	0.6	\$1,350	\$810	com's with Defendants' re estimate of trial time; com's with MTJ re same; review and analysis of proposed stipulation and order re schedule for same	Trial and Pretrial Preparation
8/28/2024	Mark Johnson	0.5	\$1,150	\$575	draft stip and proposed order re extension of time to submit trial time estimate	Case Organization, Planning and Strategy
8/28/2024	Mark Johnson	0.6	\$1,150	\$690	calls w/ GBW (x6) re Waters supplemental expert report, D production of data supporting Saad's numerosity analysis, scheduling of Kennedy depo, extension of time for submitting trial time estimate and stip re same,	Case Organization, Planning and Strategy
8/28/2024	Mark Johnson	0.5	\$1,150	\$575	call w/ GBW re Waters depo prep, Saad and Baird limited depositions on access issues, preparation of amended Exhibit A to complaint, Mastin / Waters declarations for MSJ, Mastin supplemental expert report	Case Organization, Planning and Strategy
8/28/2024	Mark Johnson	0.1	\$1,150	\$115	email to LEC re Anderson depo	Depositions
8/28/2024	Mark Johnson	0.2	\$1,150	\$230	email to OC Rutner re scope of J Allen depo, review prior email and coms w/ BU re same	Depositions
8/28/2024	Mark Johnson	1.1	\$1,150	\$1,265	Video call w/ Dr. Flores, B Umpierre, Jim Thornton, G Wallace re prep for Josh Allen depo	Depositions
8/28/2024	Mark Johnson	0.9	\$1,150	\$1,035	draft notes, questions for Waters/Mastin depo	Depositions
8/28/2024	Mark Johnson	0.2	\$1,150	\$230	draft email to OC re additional sql tables to be produced, review attachment and prior email from J Thonrton related to same.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/28/2024	Mark Johnson	0.3	\$1,150	\$345	review and analysis of T Close timeline and summary of construction history at Scotts Valley, email experts re same.	Discovery (Non-Deposition)
8/28/2024	Mark Johnson	0.4	\$1,150	\$460	coms w/ RLS, TCC re facilities licenses and license applications, review same and compile information re number of non-ambulatory rooms, bedridden patients, hospice waivers, etc. email to COC and experts re same.	Discovery (Non-Deposition)
8/28/2024	Mark Johnson	2.5	\$1,150	\$2,875	review and edit Waters supplemental expert report re issues raised by Anderson report	Experts (Including Retention)
8/28/2024	Rachel Steyer	1.4	\$750	\$1,050	attempted class outreach, leaving VMs, updating and reviewing notes in spreadsheet	Class Certification
8/28/2024	Rachel Steyer	0.2	\$750	\$150	spoke w/daughter of former resident, no FSP issues	Class Outreach and Contact
8/28/2024	Rachel Steyer	0.2	\$750	\$150	spoke w/daughter of former resident, no FSP issues	Class Outreach and Contact
8/28/2024	Rachel Steyer	0.8	\$750	\$600	gathering and preparing six facility DSS licensing docs	Discovery (Non-Deposition)
8/28/2024	Rachel Steyer	3.7	\$750	\$2,775	ongoing review and updating of discovery index	Discovery (Non-Deposition)
8/28/2024	Travis Close	0.8	\$850	\$680	Change flights & hotel reservation to accommodate defendants' needed depo scheduling changes	Case / Document Administration
8/28/2024	Travis Close	2.9	\$850	\$2,465	Draft timeline of construction history at Scotts Valley based on construction permits, applications, and relevant letters in record	Case Organization, Planning and Strategy
8/28/2024	Travis Close	1.9	\$850	\$1,615	Call with June Kailes re: depo prep session #1 -- document review progress, questions from report & additional materials recently received, depo questions	Case Organization, Planning and Strategy
8/28/2024	Travis Close	0.2	\$850	\$170	Email to MTJ, RLS re: facility application materials assignment	Case Organization, Planning and Strategy
8/28/2024	Travis Close	0.9	\$850	\$765	Research precise changes of # of units over time through building records for Scotts Valley facility	Case Organization, Planning and Strategy
8/28/2024	Travis Close	0.3	\$850	\$255	Email to JIK re: questions for next Monday's depo prep	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/28/2024	Travis Close	0.6	\$850	\$510	Review and analyze opposition to motion to exclude testimony of Kailes for key points to address for depo prep re: following usual methodology; summarize and email to June	Case Organization, Planning and Strategy
8/28/2024	Travis Close	0.4	\$850	\$340	Review and analyze examples of Brookdale facility licensing documents: applications and licenses	Discovery (Non-Deposition)
8/29/2024	Guy Wallace	1.5	\$1,350	\$2,025	review and analysis of Defendants' opposition to request to certify issues pursuant to section 1292; legal research and analysis re same	Appeal
8/29/2024	Guy Wallace	1.0	\$1,350	\$1,350	preparation of topics and questions re Waters depo prep	Depositions
8/29/2024	Guy Wallace	4.6	\$1,350	\$6,210	meeting with Waters; MTJ re deposition preparation	Depositions
8/29/2024	Guy Wallace	1.1	\$1,350	\$1,485	com's with Waters; MTJ; TCC re depo preparation and documents re Scotts Valley facility	Depositions
8/29/2024	Guy Wallace	1.2	\$1,350	\$1,620	revise and edit draft Waters supplemental report; com's with Waters; MTJ re same	Experts (Including Retention)
8/29/2024	Guy Wallace	0.6	\$1,350	\$810	com's with JY; BBK; MTJ re draft PSJ re access barriers	Motion for Summary Judgment / Adjudication
8/29/2024	Mark Johnson	4.0	\$1,150	\$4,600	Depo prep session w/ G Waters, G Wallace	Depositions
8/29/2024	Mark Johnson	0.2	\$1,150	\$230	follow up call w/ GBW re Waters depo prep	Depositions
8/29/2024	Mark Johnson	0.2	\$1,150	\$230	draft email to COC re depositions of Saad and Baird on access related issues, coverage of same	Depositions
8/29/2024	Mark Johnson	0.2	\$1,150	\$230	call w J Mastin re preparation of list of disputed barriers and identifying support for same for depo prep.	Depositions
8/29/2024	Mark Johnson	0.2	\$1,150	\$230	review and analyze Mastin list of disputed barriers and support of P position for depo prep	Depositions
8/29/2024	Mark Johnson	0.1	\$1,150	\$115	emails w/ B Umpierre conveying and commenting on expert reports and notes for preparation for J Allen depo.	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/29/2024	Mark Johnson	1.5	\$1,150	\$1,725	review and draft proposed revisions to Waters supplemental expert report	Experts (Including Retention)
8/29/2024	Mark Johnson	0.9	\$1,150	\$1,035	call w/ GBW re Mastin/Waters declaration iso MSJ on access barriers; reviewing proposed exhibits, format of same, information to be excluded	Motion for Summary Judgment / Adjudication
8/29/2024	Mark Johnson	0.3	\$1,150	\$345	email coms/ w Yelin, Bien-Kahn and Wallace re format and content of exhibits to Mastin/Waters declaration for list of undisputed barriers.	Motion for Summary Judgment / Adjudication
8/29/2024	Mark Johnson	0.4	\$1,150	\$460	review proposed exhibits for mtn for summary judgment containing list of undisputed barriers, reformat same from Anderson spreadsheets.	Motion for Summary Judgment / Adjudication
8/29/2024	Mark Johnson	0.2	\$1,150	\$230	call w/ R Steyer re preparing amended Exhibit A to complaint, list of access barriers, approach to same.	Pleadings and Motions Re: Pleadings
8/29/2024	Rachel Steyer	1.0	\$750	\$750	attempted class outreach, leaving VMs, updating and reviewing notes in spreadsheet	Class Outreach and Contact
8/29/2024	Rachel Steyer	0.3	\$750	\$225	received call back from daughter of current resident, discussed case	Class Outreach and Contact
8/29/2024	Rachel Steyer	1.6	\$750	\$1,200	further review and updating master index	Discovery (Non-Deposition)
8/29/2024	Rachel Steyer	0.2	\$750	\$150	call with MTJ re preparing revised Exhibit A barrier list	Experts (Including Retention)
8/29/2024	Rachel Steyer	2.2	\$750	\$1,650	preparing revised/updated exhibit A with facility barriers	Experts (Including Retention)
8/29/2024	Rachel Steyer	0.2	\$750	\$150	reviewing research memo re rebuttal expert reports from AS	Misc. Research
8/29/2024	Rachel Steyer	0.5	\$750	\$375	reviewing defendants' opposition to motion for interlocutory appeal	Other Motions
8/29/2024	Rachel Steyer	1.6	\$750	\$1,200	reviewing BBK revised draft PMSJ	Other Motions
8/29/2024	Travis Close	0.3	\$850	\$255	Review and analyze depo of Michael Johnson for info re: training of Brookdale drivers	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/29/2024	Travis Close	0.5	\$850	\$425	Additional research for GBW re: capacity increase associated with project in 1995-1996 remodel/sesmic retrofit at Scotts Valley	Case Organization, Planning and Strategy
8/29/2024	Travis Close	0.6	\$850	\$510	Prep for depo prep conference with Doug Cross (review depo outline, previous notes, rule 26 report, and draft additional questions)	Depositions
8/29/2024	Travis Close	3.0	\$850	\$2,550	Depo prep session # 3 -- Doug Cross	Depositions
8/29/2024	Travis Close	0.8	\$850	\$680	Review and analyze latest draft of partial motion for summary judgement	Motion for Summary Judgment / Adjudicaiton
8/30/2024	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ re schedule on briefing; preparation of PSJ and expert declaration support re same; results of Waters deposition; motion for appeal under section 1292	Case Organization, Planning and Strategy
8/30/2024	Guy Wallace	8.8	\$1,350	\$11,880	prepare for and defend deposition of Waters	Depositions
8/30/2024	Guy Wallace	0.6	\$1,350	\$810	legal research and analysis re supplemental reports under Rule 26(e)	Depositions
8/30/2024	Mark Johnson	0.6	\$1,150	\$690	team zoom mtg w/ Grunfeld, Close, Yelin, Bien-Kahn, Umpierre, others re upcoming depositions, summary judgment, briefing on motions	Case Organization, Planning and Strategy
8/30/2024	Mark Johnson	0.3	\$1,150	\$345	email exchanges w/ OC E Rutner re extending deadlines for Daubert motions and reply brief on mtn seeking certification of interlocutory appeal; com w/ GBW re same.	Case Organization, Planning and Strategy
8/30/2024	Mark Johnson	0.2	\$1,150	\$230	calls w/ GBW re Waters depo, materials needed for same.	Depositions
8/30/2024	Mark Johnson	0.6	\$1,150	\$690	coms w/ Waters, Wallace re Waters depo issues during breaks in depo and before/after	Depositions
8/30/2024	Mark Johnson	0.3	\$1,150	\$345	review and analyze new docs produced by Defendants - revised residency agreement and FSP presentation.	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/30/2024	Mark Johnson	0.1	\$1,150	\$115	email to TCC, GBW re need to request talking points and other docs on links in FSP policy presentation.	Discovery (Non-Deposition)
8/30/2024	Mark Johnson	0.5	\$1,150	\$575	conversations w/ G Waters re 1985 and 1989 CBC, completeness of 1989 version as UBC +CBC, issues w/ citations in reports, review same	Experts (Including Retention)
8/30/2024	Mark Johnson	0.1	\$1,150	\$115	email exchange w/ OC E Rutner re depositions of Saad and Baird on access - related topics	Experts (Including Retention)
8/30/2024	Mark Johnson	0.5	\$1,150	\$575	review portions of Saad rebuttal declaration re Flores opinion on record of assessed needs, review Flores rreport re same; draft email to Flores seeking explanation and input	Experts (Including Retention)
8/30/2024	Mark Johnson	0.9	\$1,150	\$1,035	conference call w/ Bien-Kahn and Yelin re summary judgment mtn, issues with code citations, mastin / waters declarations, exhibits and scope and format of same.	Motion for Summary Judgment / Adjudicaiton
8/30/2024	Mark Johnson	0.4	\$1,150	\$460	follow up call w/ B Bien-Kahn and Yelin re summary judgment declarations, format of exhibits, verification of code citations, code editions.	Motion for Summary Judgment / Adjudicaiton
8/30/2024	Mark Johnson	0.4	\$1,150	\$460	review draft barrier list exhibit for MSJ motion; draft email to Mastin and Waters re review of same verification of citations.	Motion for Summary Judgment / Adjudicaiton
8/30/2024	Mark Johnson	0.4	\$1,150	\$460	review email from BBK re status of development of MSJ barrier list exhibits and approach/strategy re same; review sample for Brookhurst, respond w/ prosed edits	Motion for Summary Judgment / Adjudicaiton
8/30/2024	Mark Johnson	0.4	\$1,150	\$460	review draft declaration for Mastin iso motion for summary judgment, draft proposed edits for same.	Motion for Summary Judgment / Adjudicaiton

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/30/2024	Mark Johnson	0.2	\$1,150	\$230	draft email to TCC and RLS re preparation of stip and order re Daubert motion deadline and motion for admin relief re extension of reply deadline on mtn to certify for interlocutory appeal.	Other Motions
8/30/2024	Mark Johnson	0.3	\$1,150	\$345	email exchange w/ RLS re stip re daubert motion deadline, review local rules and standing order re same	Other Motions
8/30/2024	Mark Johnson	0.3	\$1,150	\$345	draft email coms w/ J Yelin, BBK, Mastin, Waters re completeness and interpretation of 1989 CBC	Other Motions
8/30/2024	Rachel Steyer	0.7	\$750	\$525	weekly meeting with RBGG, MTJ, TCC, BSU to review and discuss ongoing tasks and assignments	Case Organization, Planning and Strategy
8/30/2024	Rachel Steyer	1.0	\$750	\$750	attempted class outreach, leaving VMs, updating and reviewing notes in spreadsheet	Class Outreach and Contact
8/30/2024	Rachel Steyer	0.3	\$750	\$225	reviewing production for dates of assessment docs per defendants' expert report	Discovery (Non-Deposition)
8/30/2024	Rachel Steyer	3.9	\$750	\$2,925	continuing work on preparing updated exhibit A list of access barriers	Experts (Including Retention)
8/30/2024	Rachel Steyer	0.7	\$750	\$525	drafting stipulation re extension of daubert reports	Other Motions
8/30/2024	Travis Close	0.2	\$850	\$170	Review and analyze memo from co-counsel re: expert disclosures and rebuttal witnesses	Case Organization, Planning and Strategy
8/30/2024	Travis Close	0.4	\$850	\$340	Review and analyze insert for MSJ re: long-term medical facilities & 50% threshold	Case Organization, Planning and Strategy
8/30/2024	Travis Close	0.7	\$850	\$595	Weekly meeting with co-counsel re: deposition strategy, decertification motion, upcoming daubert motions	Case Organization, Planning and Strategy
8/30/2024	Travis Close	1.3	\$850	\$1,105	Research requirements under Rule 26 and case law to supplement expert reports to identify typos & strike-through text for corrections	Case Organization, Planning and Strategy
8/30/2024	Travis Close	0.8	\$850	\$680	Review, analyze, and organize additional docs requested by June Kailes for depo prep review	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
8/30/2024	Travis Close	0.3	\$850	\$255	Email to JIK explaining process, plan of correction, & interventions for citations given by Dept of Social Services	Case Organization, Planning and Strategy
8/30/2024	Travis Close	1.3	\$850	\$1,105	Summarize depo transcripts re: emergency evacuation testimony for Kailes depo prep	Depositions
8/30/2024	Travis Close	0.8	\$850	\$680	Review and analyze new residency agreements produced by Brookdale to determine differences vs. previous versions	Discovery (Non-Deposition)
8/30/2024	Travis Close	0.5	\$850	\$425	Review and analyze defendants' opposition to motion to certify order for interlocutory appeal	Other Motions
8/31/2024	Guy Wallace	1.7	\$1,350	\$2,295	review and analysis of draft motion for PSJ; com's with GG; JY; BBK; MTJ re same; revise and edit same	Motion for Summary Judgment / Adjudicaiton
8/31/2024	Mark Johnson	0.7	\$1,150	\$805	call w/ GBW re draft mtn for summary judgment, inclusion of argument re affirmative obligation to remove barriers.	Motion for Summary Judgment / Adjudicaiton
8/31/2024	Travis Close	0.4	\$850	\$340	Email to RLS re: making sense of Daubert motion deadlines through prior filings & scheduling order	Case Organization, Planning and Strategy
8/31/2024	Travis Close	2.6	\$850	\$2,210	Draft Admin motion for extention of time to file reply iso motion to certify for interlocutory appeal	Other Motions
8/31/2024	Travis Close	0.4	\$850	\$340	Email to RLS, MTJ re: timeline calculations for when Daubert motions are due based on stipulations & court orders	Other Motions
9/1/2024	Guy Wallace	5.1	\$1,350	\$6,885	preparation and drafting of opposition to motion for decertification	Class Certification
9/1/2024	Guy Wallace	1.6	\$1,350	\$2,160	preparation of notes and issues re Waters deposition; analysis of testimony; com's with Waters; Mastin; MTJ re same (.1)	Depositions
9/1/2024	Guy Wallace	1.0	\$1,350	\$1,350	review and analysis of draft supplemental report of Mastin; revise and edit same; com's with MTJ re same	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/1/2024	Guy Wallace	0.7	\$1,350	\$945	review and analysis of draft motion for PSJ; barriers argument	Motion for Summary Judgment / Adjudication
9/1/2024	Mark Johnson	0.0	\$1,150	\$0	Calls w/ GBW (x2) re Mastin depo prep, opp to mtn to decertify class, draft summary judgment mtn	Case Organization, Planning and Strategy
9/1/2024	Mark Johnson	0.2	\$1,150	\$230	Call w/ GBW re Mastin supplemental report and depo prep	Depositions
9/1/2024	Mark Johnson	1.1	\$1,150	\$1,265	call w/ J Mastin re depo prep, potential lines of examination	Depositions
9/1/2024	Mark Johnson	0.1	\$1,150	\$115	email w/ B Umpierre re ADAAG and provision re medical facilities.	Depositions
9/1/2024	Mark Johnson	2.3	\$1,150	\$2,645	review materials for Mastin depo prep	Depositions
9/1/2024	Mark Johnson	1.6	\$1,150	\$1,840	review Mastin chart of disputed barriers with supporting citations; review applicable provisions of CBC and draft additional paragraphs of supplemental expert report re same.	Experts (Including Retention)
9/1/2024	Mark Johnson	1.0	\$1,150	\$1,150	work on review and revisions to Mastin supplemental expert report.	Experts (Including Retention)
9/1/2024	Mark Johnson	1.4	\$1,150	\$1,610	review and revise admin mtn for extension of reply deadline on mtn for interlocutory appeal. coms w/ T Close re same.	Other Motions
9/1/2024	Mark Johnson	0.2	\$1,150	\$230	emails exchanges w/ A Spiegel, TCC re calculating deadline for Daubert motion, standing order re same	Other Motions
9/1/2024	Mark Johnson	0.6	\$1,150	\$690	review prior correspondence and document production for analysis of Ds contentions re numerosity and factual basis for same, produciton of underlying documents, draft email to GBW detailing same.	Other Motions
9/1/2024	Mark Johnson	0.4	\$1,150	\$460	email exchanges w/ J Thornton re document and data production that could support D expert report re class member numbers; com w/ RAB re same.	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/1/2024	Mark Johnson	0.1	\$1,150	\$115	email coms w/ J Yelin, BBK re proposed mtn to seal	Other Motions
9/1/2024	Rachel Steyer	0.2	\$750	\$150	finalizing draft stipulation to extend daubert motions	Other Motions
9/1/2024	Travis Close	1.8	\$850	\$1,530	Draft declaration & proposed order in support of motion for extension of time to file reply iso interlocutory appeal	Case Organization, Planning and Strategy
9/1/2024	Travis Close	0.4	\$850	\$340	Further edits to motion for extension of time to file reply iso interlocutory appeal	Case Organization, Planning and Strategy
9/2/2024	Guy Wallace	1.3	\$1,350	\$1,755	preparation and drafting of opposition to Defendants' motion for decertification	Class Certification
9/2/2024	Guy Wallace	0.7	\$1,350	\$945	review and analysis of proposed edits from GG to draft opposition to motion for decertification	Class Certification
9/2/2024	Guy Wallace	1.5	\$1,350	\$2,025	revise and edit opposition to motion for decertification	Class Certification
9/2/2024	Guy Wallace	1.3	\$1,350	\$1,755	com's with Mastin; MTJ re preparation for deposition of Mastin; revise and edit draft Rule 26(e) report from Mastin	Depositions
9/2/2024	Guy Wallace	3.5	\$1,350	\$4,725	review and analysis of expert report of Josh Allen; review and analysis of draft depo outline re Allen; preparation of additional questions re same; com's with BU re same (.3)	Depositions
9/2/2024	Mark Johnson	0.3	\$1,150	\$345	calls (x2) w/ GBW re mastin depo, class cert opposition, extension of deadly for reply on mtn for interlocutory appeal	Case Organization, Planning and Strategy
9/2/2024	Mark Johnson	3.0	\$1,150	\$3,450	Video depo prep session with J Mastin and (for part of the time) G Wallace	Depositions
9/2/2024	Mark Johnson	0.2	\$1,150	\$230	email exchange w/ GCG re depo topics for Barchuk depo for depo prep	Depositions
9/2/2024	Mark Johnson	0.2	\$1,150	\$230	email coms w/ GCG and TCC re Barchuk depo prep and potential areas of examination.	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/2/2024	Mark Johnson	0.3	\$1,150	\$345	draft email to J Mastin re additional issues to consider for depo prep, copy of stipulation and recent order re stipulation and successor liability.	Depositions
9/2/2024	Mark Johnson	2.6	\$1,150	\$2,990	prep for Mastin depo, including collection of relevant docs, reports, etc. and drafting overview of same, identifying review tasks for depo and potential questions.	Depositions
9/2/2024	Mark Johnson	0.7	\$1,150	\$805	Review and draft edits to Mastin supplemental disclosure; review and incorporate edits from GBW of same; coms w/ J Mastin re same, finalize and send to OC	Experts (Including Retention)
9/2/2024	Mark Johnson	0.3	\$1,150	\$345	coms w/ J Yelin, BBK and Waters re CBC and CPC code provisions, collect and send 89, 98 CBC, coms re expert declarations for MSJ	Motion for Summary Judgment / Adjudication
9/2/2024	Mark Johnson	0.5	\$1,150	\$575	review draft of opposition to mtn to decertify Rule 23(b)(2) class, with GCG comments	Other Motions
9/2/2024	Mark Johnson	0.2	\$1,150	\$230	call w/ J Yelin re Mastin verification of barrier citations, plumbing code section, Mastin and Waters declarations iso MSJ	Other Motions
9/2/2024	Mark Johnson	0.1	\$1,150	\$115	draft email to J Mastin re verification of citations for agreed-upon common area barriers.	Other Motions
9/2/2024	Mark Johnson	0.2	\$1,150	\$230	coms w/ OC and w/ T Close re stipulation for extension of time to file reply iso mtn for interlocutory appeal	Other Motions
9/2/2024	Mark Johnson	0.3	\$1,150	\$345	review and revise TCC stip re extension of time for reply iso mtn for interlocutory appeal coms w/ LEC re filing same.	Other Motions
9/2/2024	Travis Close	0.2	\$850	\$170	Call with MTJ re: stipulation and order re reply supporting motion to certify for interlocutory appeal	Case Organization, Planning and Strategy
9/2/2024	Travis Close	3.3	\$850	\$2,805	Depo prep session # 1 - June Kailes	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/3/2024	Guy Wallace	2.9	\$1,350	\$3,915	revise and edit opposition to Defendants' motion for decertification; com's with BU re same (.5)	Class Certification
9/3/2024	Guy Wallace	3.5	\$1,350	\$4,725	preparation of final versions of brief in opposition to Defendants' motion for decertification; declaration of BU re same	Class Certification
9/3/2024	Guy Wallace	1.2	\$1,350	\$1,620	preparation of questions for deposition of Mr. Allen; com's with BU; Waters; MTJ re same	Depositions
9/3/2024	Guy Wallace	1.7	\$1,350	\$2,295	revise and edit draft motion for PSJ	Motion for Summary Judgment / Adjudication
9/3/2024	Mark Johnson	0.7	\$1,150	\$805	review final of opposition to mtn for class certification and declaration of B Umpierre in support of same.	Class Certification
9/3/2024	Mark Johnson	0.7	\$1,150	\$805	video call w/ J Mastin re depo prep	Depositions
9/3/2024	Mark Johnson	5.6	\$1,150	\$6,440	Deposition of expert Jeff Mastin	Depositions
9/3/2024	Mark Johnson	0.8	\$1,150	\$920	confer w/ expert witness Jeff Mastin re depo examination during breaks in depo	Depositions
9/3/2024	Mark Johnson	0.3	\$1,150	\$345	call w/ G Wallace re Mastin depo, D strategy for use in MSJ and / or decert mtn.	Depositions
9/3/2024	Mark Johnson	0.8	\$1,150	\$920	review depo outline for Allen and add to same.	Depositions
9/3/2024	Mark Johnson	0.7	\$1,150	\$805	review proposed lines of questioning for Allen depo from GBW, research other topics and draft and circulate additional questions	Depositions
9/3/2024	Mark Johnson	0.1	\$1,150	\$115	coms w/ court reporter re Mastin depo exhibit; download and send same	Depositions
9/3/2024	Mark Johnson	0.4	\$1,150	\$460	pre-depo review and organization of materials and potential exhibits for Mastin depo prep	Depositions
9/3/2024	Mark Johnson	0.1	\$1,150	\$115	com w/ Jen U, Guy, Travis Rachel re Mastin expert report exhibits.	Experts (Including Retention)
9/3/2024	Mark Johnson	0.1	\$1,150	\$115	email exchanges w/ OC Rutner re Daubert motion deadline	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/3/2024	Rachel Steyer	0.3	\$750	\$225	call with Cary Catron re case, decided to table further follow up convos b/c mother resident of Tracy facility	Class Outreach and Contact
9/3/2024	Rachel Steyer	1.7	\$750	\$1,275	attempted class outreach, leaving VMs, updating and reviewing notes in spreadsheet	Class Outreach and Contact
9/3/2024	Rachel Steyer	0.2	\$750	\$150	spoke w/daughter of former resident, no relevant FSP issues	Class Outreach and Contact
9/3/2024	Rachel Steyer	0.2	\$750	\$150	call with daughter of current resident, discussed updates re applicability of FSP	Class Outreach and Contact
9/3/2024	Rachel Steyer	2.9	\$750	\$2,175	ongoing preparation of new Exhibit A barriers lists	Experts (Including Retention)
9/3/2024	Rachel Steyer	0.5	\$750	\$375	proofreading opposition to motion to decertify	Other Motions
9/3/2024	Travis Close	1.3	\$850	\$1,105	Draft stipulation and proposed order re: extension of time to submit reply to motion for interlocutory appeal	Case Organization, Planning and Strategy
9/3/2024	Travis Close	1.6	\$850	\$1,360	Draft additional questions for June Kailes depo prep session # 3	Case Organization, Planning and Strategy
9/3/2024	Travis Close	1.3	\$850	\$1,105	Legal research on definition of social service vs. medical facilities within DSS, CA Public Health regulations & authorizing statute	Case Organization, Planning and Strategy
9/3/2024	Travis Close	0.2	\$850	\$170	Prep for depo prep session # 2 with June Kailes	Depositions
9/3/2024	Travis Close	3.3	\$850	\$2,805	Depo prep session #2 - June Kailes	Depositions
9/3/2024	Travis Close	0.7	\$850	\$595	Kailes depo prep - review and analyze list of recent publications in Kailes CV for info on topics related to consultation in this case	Depositions
9/4/2024	Guy Wallace	0.6	\$1,350	\$810	legal research and analysis re Defendants' arguments that Rule 23(f) is the exclusive avenue for appeal	Appeal
9/4/2024	Guy Wallace	4.1	\$1,350	\$5,535	revise and edit draft motion for PSJ	Motion for Summary Judgment / Adjudicaiton
9/4/2024	Guy Wallace	0.9	\$1,350	\$1,215	com's with BBK; MTJ re PSJ; review and analysis of draft Mastin declaration re same	Motion for Summary Judgment / Adjudicaiton

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/4/2024	Guy Wallace	0.6	\$1,350	\$810	review and analysis of revised barriers lists re Brookhurst; San Ramon; Scotts Valley; com's with RLS re same	Pleadings and Motions Re: Pleadings
9/4/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re decert opposition and opposition to 1292	Case Organization, Planning and Strategy
9/4/2024	Jennifer Bybee	0.1	\$925	\$93	Review emails between co-counsel last week while on vacation	Case Organization, Planning and Strategy
9/4/2024	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW re summary judgment mtn, Anderson depo, Kailes depo, settlement demand	Case Organization, Planning and Strategy
9/4/2024	Mark Johnson	0.3	\$1,150	\$345	calls w/ GBW (x2) re MSJ motion, Anderson depo and depo prep, depositions of Saad and Baird re access issues.	Case Organization, Planning and Strategy
9/4/2024	Mark Johnson	0.2	\$1,150	\$230	draft email to OC Jacobsen re Anderson docs and depo date; email to GBW re same	Depositions
9/4/2024	Mark Johnson	4.3	\$1,150	\$4,945	work on depo prep research and outline for Anderson	Depositions
9/4/2024	Mark Johnson	0.1	\$1,150	\$115	email exchanges w/ OC re depo scheduling, meeting and confer on mtn to strike	Experts (Including Retention)
9/4/2024	Mark Johnson	1.0	\$1,150	\$1,150	Review and draft revisions to Mastin declaration iso msj; review barrier report and Anderson spreadsheets related to same	Motion for Summary Judgment / Adjudicaiton
9/4/2024	Mark Johnson	0.6	\$1,150	\$690	draft email to COC explaining issues related to Mastin declaration and barrier spreadsheet for San Ramon. Follow-up email exhchanges re same.	Motion for Summary Judgment / Adjudicaiton
9/4/2024	Mark Johnson	0.2	\$1,150	\$230	review and comment on proposed order on MSJ	Motion for Summary Judgment / Adjudicaiton
9/4/2024	Rachel Steyer	1.0	\$750	\$750	conducted intake call with Bill Novickas	Class Outreach and Contact
9/4/2024	Rachel Steyer	6.0	\$750	\$4,500	ongoing review of and preparing additional exhibit list of barriers	Experts (Including Retention)
9/4/2024	Rachel Steyer	0.3	\$750	\$225	tabulating number of barriers in earlier report, response to GBW and MTJ	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/4/2024	Travis Close	0.2	\$850	\$170	Email to MTJ with upcoming times for June Kailes depo prep	Case Organization, Planning and Strategy
9/4/2024	Travis Close	0.3	\$850	\$255	Prep for June Kailes depo session # 3	Depositions
9/4/2024	Travis Close	3.2	\$850	\$2,720	June Kailes depo prep session # 3	Depositions
9/4/2024	Travis Close	1.6	\$850	\$1,360	Draft additional questions for today's depo prep with Doug Cross	Depositions
9/4/2024	Travis Close	3.1	\$850	\$2,635	Depo prep session # 4 - Douglas Cross	Depositions
9/4/2024	Travis Close	0.2	\$850	\$170	Email to Doug Cross re: notes before today's depo prep	Experts (Including Retention)
9/4/2024	Travis Close	0.2	\$850	\$170	Email to BBK (co-counsel) re: Cross declaration needed for MSJ	Experts (Including Retention)
9/5/2024	Guy Wallace	1.1	\$1,350	\$1,485	legal research and analysis re argument that interlocutory appeals are limited to Rule 23(f)	Appeal
9/5/2024	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of Defendants' opposition to motion to certify issue for appeal; com's with JAU re same (.5)	Appeal
9/5/2024	Guy Wallace	0.6	\$1,350	\$810	com's with PK; BU; MTJ re depositions and schedule re same	Experts (Including Retention)
9/5/2024	Guy Wallace	2.2	\$1,350	\$2,970	review and analysis of draft motion for PSJ; revise and edit same; com's with BBK; MTJ re same	Motion for Summary Judgment / Adjudicaiton
9/5/2024	Guy Wallace	1.5	\$1,350	\$2,025	review and analysis of updated access barrier list re Brookhurst; San Ramon; Scotts Valley	Pleadings and Motions Re: Pleadings
9/5/2024	Jennifer Bybee	0.9	\$925	\$833	Review Defendants' Opp to Pltfs. Mot. for to Certify Order for Interlocutory Appeal	Class Certification
9/5/2024	Jennifer Bybee	0.3	\$925	\$278	Com's with GBW re 1292 reply brief	Class Certification
9/5/2024	Mark Johnson	0.8	\$1,150	\$920	Call w/ GBW re MSJ brief, ADAAG v ADAS language on medical care facility and long term care, Kailes deposition, San Ramon construction dates building A v Building B, depositons of Saad and Baird on access issues.	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/5/2024	Mark Johnson	0.5	\$1,150	\$575	call w/ GBW re Anderson depo, reply iso opposition to certification of issue for appeal; issue of injury from barrier encounter	Case Organization, Planning and Strategy
9/5/2024	Mark Johnson	1.1	\$1,150	\$1,265	review Kailes expert report for depo prep session	Depositions
9/5/2024	Mark Johnson	1.7	\$1,150	\$1,955	participate in depo prep session w/ J Kailes, T Close	Depositions
9/5/2024	Mark Johnson	2.7	\$1,150	\$3,105	work on depo outline for Anderson, review reports, spreadsheets for same	Depositions
9/5/2024	Mark Johnson	0.2	\$1,150	\$230	email exchanges w/ BBK, GBW re form of order on MSJ	Motion for Summary Judgment / Adjudication
9/5/2024	Mark Johnson	0.5	\$1,150	\$575	begin review of D's MSJ	Motion for Summary Judgment / Adjudication
9/5/2024	Rachel Steyer	0.2	\$750	\$150	reviewing GBW version of Exhibit A to track for edits	Experts (Including Retention)
9/5/2024	Rachel Steyer	0.3	\$750	\$225	tallying up facility barrier totals from earlier exhibit A for GBW and MTJ	Experts (Including Retention)
9/5/2024	Rachel Steyer	5.7	\$750	\$4,275	preparing exhibit barrier list for Fountaingrove, Hemet, Tracy	Experts (Including Retention)
9/5/2024	Travis Close	0.8	\$850	\$680	Draft list of additional docs considered by June Kailes after submitting her Rule 26 report	Case Organization, Planning and Strategy
9/5/2024	Travis Close	0.7	\$850	\$595	Call with Doug Cross re: reviewing declaration & obtaining signature for same in support of motion for partial summary judgment	Case Organization, Planning and Strategy
9/5/2024	Travis Close	0.8	\$850	\$680	Research evidence of ambulatory & non-ambulatory capacity at the six plaintiffs' facilities	Case Organization, Planning and Strategy
9/5/2024	Travis Close	0.7	\$850	\$595	Legal research on definitions of ambulatory/nonambulatory per DSS regulations & California statutes	Case Organization, Planning and Strategy
9/5/2024	Travis Close	0.6	\$850	\$510	Email to Douglas Cross re: summary of today's depo with Barchuk, additional scooter manuals to share, & additional questions/points to review before next week	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/5/2024	Travis Close	0.7	\$850	\$595	Analyze older & new version of residency agreements for info about emergencies	Case Organization, Planning and Strategy
9/5/2024	Travis Close	0.7	\$850	\$595	Review and analyze plaintiffs' opposition to motion for decertification (as filed)	Class Certification
9/5/2024	Travis Close	2.7	\$850	\$2,295	Depo prep session # 4 - June Kailes	Depositions
9/6/2024	Guy Wallace	0.7	\$1,350	\$945	legal research and analysis re Defendants' arguments re controlling questions of law	Appeal
9/6/2024	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of Defendants' motion for summary judgment; com's with MTJ re same (.4)	Motion for Summary Judgment / Adjudicaition
9/6/2024	Guy Wallace	1.4	\$1,350	\$1,890	team zoom with GG; JJY; BBK; AS; Munoz; BU; MTJ; re preparation of opposition to Defendants' MSJ; expert depositions; trial preparation; settlement	Motion for Summary Judgment / Adjudicaition
9/6/2024	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ re Defendants' MSJ	Motion for Summary Judgment / Adjudicaition
9/6/2024	Guy Wallace	2.1	\$1,350	\$2,835	review and analysis of Defendants' MSJ; preparation of email to re same to co-counsel	Motion for Summary Judgment / Adjudicaition
9/6/2024	Mark Johnson	1.1	\$1,150	\$1,265	Team Zoom mtg w/ Guy, Gay, Ben, Brian, Karen, Brenda, Darcy, Adrienne, Jenny, Karen re analysis and response to D MSJ, 1292 opposition, trial prep, expert depos, Omole depo, Settlement conference, Daubert Motion, Brookhurst Plaintiff	Case Organization, Planning and Strategy
9/6/2024	Mark Johnson	0.4	\$1,150	\$460	continue review of D MSJ and call w/ GBW re same	Motion for Summary Judgment / Adjudicaition
9/6/2024	Travis Close	7.1	\$850	\$6,035	Deposition of June Kailes (includes calls to witness & MTJ on break)	Depositions
9/6/2024	Travis Close	0.7	\$850	\$595	Draft summary of today's deposition with Kailes for team & co-counsel	Depositions
9/7/2024	Guy Wallace	3.6	\$1,350	\$4,860	legal research and analysis re Defendants' opposition to motion for appeal pursuant to section 1292; preparation of initial outline of reply brief re same	Appeal

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/7/2024	Guy Wallace	2.4	\$1,350	\$3,240	legal research and analysis re Section 1292 standards and Rule 23(f); motion to certify issue for appeal	Appeal
9/7/2024	Jennifer Bybee	2.0	\$925	\$1,850	Research substantial ground for difference of opinion and cases cited in Defendants Opposition	Appeal
9/7/2024	Jennifer Bybee	0.1	\$925	\$93	Review email between co-counsel re MSJs and Kailes Deposition	Motion for Summary Judgment / Adjudicaiton
9/8/2024	Guy Wallace	1.8	\$1,350	\$2,430	preparation of further iteration of outline of reply brief re motion for 1292 review; com's with JAU re same (.3)	Appeal
9/8/2024	Jennifer Bybee	0.1	\$925	\$93	Review outline of Reply brief re 1292 appeal	Case Organization, Planning and Strategy
9/8/2024	Mark Johnson	0.1	\$1,150	\$115	calls w/ GBW re Saad depo re access, recent discovery order,	Case Organization, Planning and Strategy
9/8/2024	Mark Johnson	0.3	\$1,150	\$345	emails w/ R Bonner, B Umpierre and J Thornton (separate) re information for Saad access depo, data related to same, potential questions	Depositions
9/8/2024	Mark Johnson	0.1	\$1,150	\$115	email to J Bertino re information needed for Saad access depo	Depositions
9/8/2024	Mark Johnson	5.5	\$1,150	\$6,325	prep for Saad access depo, review rebuttal report, data other documents and work on depo outline.	Depositions
9/9/2024	Guy Wallace	3.6	\$1,350	\$4,860	preparation of detailed outline of reply brief re 1292 motion; legal research and analysis re Defendants' cases	Appeal
9/9/2024	Guy Wallace	2.8	\$1,350	\$3,780	preparation and drafting of reply brief re Section 1292(b); com's with JAU re same (.4)	Appeal
9/9/2024	Guy Wallace	3.4	\$1,350	\$4,590	preparation and drafting of section of reply brief re Rule 23(f) is not the exclusive means of seeking review of a class certification order; Rule 23(f) 14 day deadline does not apply to Section 1292(b)	Appeal

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/9/2024	Guy Wallace	1.2	\$1,350	\$1,620	com's with MTJ; RLS; RAB re Defendants' production of documents and remaining areas of non-production; update due to MJ Beeler	Discovery (Non-Deposition)
9/9/2024	Guy Wallace	0.5	\$1,350	\$675	com's with BBK; TCC re Defendants' arguments re Fleet Safety Policy	Motion for Summary Judgment / Adjudication
9/9/2024	Jennifer Bybee	0.2	\$925	\$185	Review revised outline of Reply re 1292 appeal	Appeal
9/9/2024	Jennifer Bybee	1.5	\$925	\$1,388	Review all cases cited in Defendant's Opposition to Plaintiffs motion for interlocutory appeal pursuant to 1292(b)	Appeal
9/9/2024	Jennifer Bybee	3.4	\$925	\$3,145	Draft Reply Mtn iso Mtn. for Interlocutory Appeal 1292	Other Motions
9/9/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re drafting reply brief re 1292(b)	Other Motions
9/9/2024	Mark Johnson	1.0	\$1,150	\$1,150	Revise Saad depo outline and review docs.	Depositions
9/9/2024	Mark Johnson	0.9	\$1,150	\$1,035	zoom call w/ GBW, R Steyer, R Bonner re analysis of document production and strategy for filing with Judge Beeler.	Discovery (Non-Deposition)
9/9/2024	Mark Johnson	0.3	\$1,150	\$345	call w GBW re 12192 reply	Other Motions
9/9/2024	Rachel Steyer	0.5	\$750	\$375	attempted class outreach, leaving VMs, updating and reviewing notes in spreadsheets	Class Outreach and Contact
9/9/2024	Rachel Steyer	0.2	\$750	\$150	call with brother in law of current resident, no change in status quo	Class Outreach and Contact
9/9/2024	Rachel Steyer	0.2	\$750	\$150	response to MTJ, GBW, RAB, JT, BSU re account history report documents in production (re Saad depo prep)	Discovery (Non-Deposition)
9/9/2024	Rachel Steyer	0.7	\$750	\$525	further review of production to identify various key documents still missing before deadline/hearing	Discovery (Non-Deposition)
9/9/2024	Rachel Steyer	0.9	\$750	\$675	teams meeting with GBW, MTJ, RAB re outstanding discovery missing	Discovery (Non-Deposition)
9/9/2024	Rachel Steyer	1.4	\$750	\$1,050	preparing index of medication admin audit reports produced	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/9/2024	Rachel Steyer	0.2	\$750	\$150	reviewing earlier internal email thread with RBGG and TCC re 16 passenger/ADA transportation rule history	Misc. Research
9/9/2024	Rachel Steyer	1.2	\$750	\$900	reviewing and reading defendants' motion for summary judgment	Other Motions
9/9/2024	Travis Close	0.6	\$850	\$510	Call with GBW re: assignments for responding to defendants' motion for summary judgment	Case Organization, Planning and Strategy
9/9/2024	Travis Close	1.7	\$850	\$1,445	Legal research on intent behind 37 CFR 1.65 & 171 and how the two sections work together	Case Organization, Planning and Strategy
9/9/2024	Travis Close	0.8	\$850	\$680	Research FTA's guidance & comments on Part 37 of the CFR (transportation service for individuals with disabilities)	Case Organization, Planning and Strategy
9/9/2024	Travis Close	1.3	\$850	\$1,105	Review and analyze Brookdale's versions of fleet inventory between 2017-2024; analyze number of vehicles over 15 passengers	Case Organization, Planning and Strategy
9/9/2024	Travis Close	1.2	\$850	\$1,020	Review and analyze defendants' motion for summary judgment	Case Organization, Planning and Strategy
9/9/2024	Travis Close	0.5	\$850	\$425	Email to Doug Cross re: strategy for addressing anticipated questions regarding defendants' new arguments in motion for summary judgment	Depositions
9/9/2024	Travis Close	0.4	\$850	\$340	Email to RAB re: declarations of Saad filed in 2022 & productions made therewith	Discovery (Non-Deposition)
9/9/2024	Travis Close	1.4	\$850	\$1,190	Draft response to co-counsel with analysis on why Defendants' arguments in MSJ re: not subject to 37.165 & 37.171 are wrong	Motion for Summary Judgment / Adjudication
9/10/2024	Guy Wallace	4.3	\$1,350	\$5,805	preparation and drafting of reply brief; sections re controlling questions of law	Appeal
9/10/2024	Guy Wallace	0.5	\$1,350	\$675	com's with BBK; MTJ; TCC re deposition of Cross and preparation re Defendants' questions re legal standards set forth in regulations	Motion for Summary Judgment / Adjudication

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/10/2024	Jennifer Bybee	1.0	\$925	\$925	Finish draft of difference of opinion section of reply brief	Other Motions
9/10/2024	Jennifer Bybee	1.0	\$925	\$925	Draft "materially advance" section of reply brief	Other Motions
9/10/2024	Jennifer Bybee	0.4	\$925	\$370	Review draft of reply brief sections	Other Motions
9/10/2024	Jennifer Bybee	0.7	\$925	\$648	Finalize draft of reply brief sections	Other Motions
9/10/2024	Jennifer Bybee	0.7	\$925	\$648	Research cases where review was granted pursuant to 1292(b) based on inter-district split	Other Motions
9/10/2024	Mark Johnson	1.7	\$1,150	\$1,955	Video conference call w/ TCC and Doug Cross re deposition.	Depositions
9/10/2024	Mark Johnson	0.2	\$1,150	\$230	coms w/ Blake Peters re Saad SAS programs, review spreadsheet re same.	Depositions
9/10/2024	Mark Johnson	0.4	\$1,150	\$460	multiple coms w/ OC Bertino, L. Castro and court reporter re scheduling and rescheduling Saad depo, exhibits, log-in procedures for remote depo	Depositions
9/10/2024	Mark Johnson	1.5	\$1,150	\$1,725	review spreadsheets identified in Saad rebuttal report disclosure.	Depositions
9/10/2024	Mark Johnson	2.0	\$1,150	\$2,300	review, revise and add to depo outline for Saad deposiiton	Depositions
9/10/2024	Mark Johnson	0.4	\$1,150	\$460	draft email to COC re analysis of D's regulatory argument re FSP claim	Motion for Summary Judgment / Adjudicaiton
9/10/2024	Mark Johnson	0.5	\$1,150	\$575	review BBK rough draft of argument for MSJ opp responding to regulatory argument on FSP claim and draft comments analysis re same for responsive email.	Motion for Summary Judgment / Adjudicaiton
9/10/2024	Mark Johnson	0.2	\$1,150	\$230	review BBK and TCC emails re BKD fleet inventory and issues related to reg re 16+ capacity vehicles.	Motion for Summary Judgment / Adjudicaiton
9/10/2024	Mark Johnson	0.6	\$1,150	\$690	review D reply iso mtn to decertify b2 class	Other Motions
9/10/2024	Rachel Steyer	2.3	\$750	\$1,725	attempted class outreach, leaving VMs, updating and reviewing notes in spreadsheet	Class Outreach and Contact
9/10/2024	Rachel Steyer	0.2	\$750	\$150	call with daughter of former resident, no FSP issues	Class Outreach and Contact
9/10/2024	Rachel Steyer	0.2	\$750	\$150	call with daughter of former resident, no FSP issues	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/10/2024	Rachel Steyer	0.2	\$750	\$150	call with daughter of former resident, no FSP issues	Class Outreach and Contact
9/10/2024	Rachel Steyer	2.2	\$750	\$1,650	further review of production to identify any missing/outstanding areas	Discovery (Non-Deposition)
9/10/2024	Rachel Steyer	0.4	\$750	\$300	looking for Flores doc for MTJ	Misc. Research
9/10/2024	Rachel Steyer	0.6	\$750	\$450	reviewing defendants' reply re motion for decertification	Other Motions
9/10/2024	Travis Close	1.3	\$850	\$1,105	Legal research on cases interpreting 28 CFR 36.202 as applied to public accommodations under Title III of ADA	Case Organization, Planning and Strategy
9/10/2024	Travis Close	0.5	\$850	\$425	Email to JIK (emergency evac expert) re: cases applying Title III to emergency evacuation policies	Case Organization, Planning and Strategy
9/10/2024	Travis Close	0.6	\$850	\$510	Email to BBK with analysis of Brookdale vehicles over 16 passengers & additional argument for why this is not relevant	Case Organization, Planning and Strategy
9/10/2024	Travis Close	1.4	\$850	\$1,190	Legal research on resolution of claims for emergency evacuation under Title III of ADA at summary judgment stage	Case Organization, Planning and Strategy
9/10/2024	Travis Close	0.7	\$850	\$595	Review and analyze defendants' declaration of Monteleone, Anderson, & supporting exhibits	Case Organization, Planning and Strategy
9/10/2024	Travis Close	0.4	\$850	\$340	Call with GBW re: responding to defendants' argument on FSP not applying to vehicles less than 16 passengers	Case Organization, Planning and Strategy
9/10/2024	Travis Close	2.7	\$850	\$2,295	Depo prep session # 5 -- Douglas Cross -	Depositions
9/10/2024	Travis Close	0.2	\$850	\$170	Email to BBK re: scheduling time to discuss FSP section in opposition to motion for summary judgment	Motion for Summary Judgment / Adjudication
9/11/2024	Guy Wallace	3.7	\$1,350	\$4,995	preparation and drafting of reply brief re motion for relief under Section 1292(b)	Appeal
9/11/2024	Guy Wallace	2.5	\$1,350	\$3,375	preparation and drafting of introduction to reply brief	Appeal

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/11/2024	Guy Wallace	2.7	\$1,350	\$3,645	preparation of integrated draft of reply brief re motion for review under Section 1292; revise and edit introduction, sections re compliance with three-prong test for review	Appeal
9/11/2024	Guy Wallace	2.2	\$1,350	\$2,970	revise and edit draft reply brief re motion for review under section 1292; com's with JRA; JY; BU; JAU re same (.7)	Appeal
9/11/2024	Guy Wallace	0.5	\$1,350	\$675	review and analysis of Defendants' reply brief re motion to decertify; com's re potential objection to improper reply evidence	Class Certification
9/11/2024	Guy Wallace	0.4	\$1,350	\$540	com's with Cross; MTJ; TC re deposition	Depositions
9/11/2024	Jennifer Bybee	1.1	\$925	\$1,018	Research cases that have certified appeals under 1292(b) based on district court split	Other Motions
9/11/2024	Jennifer Bybee	1.7	\$925	\$1,573	Create redline edit of Reply brief iso motion to certify 1292(b) review	Other Motions
9/11/2024	Mark Johnson	3.6	\$1,150	\$4,140	Deposition of Ali Saad re para 47of rebuttal report	Depositions
9/11/2024	Mark Johnson	1.5	\$1,150	\$1,725	mtg w/ T Close and Doug Cross to prepare for expert depo, joined by phone by GBW for .4	Depositions
9/11/2024	Mark Johnson	2.4	\$1,150	\$2,760	prepare for Saad depo, print and review docs, load exhibits, review and edit outline	Depositions
9/11/2024	Mark Johnson	0.3	\$1,150	\$345	draft email to COC Thornton, Marks re source code tables discovery	Discovery (Non-Deposition)
9/11/2024	Mark Johnson	0.8	\$1,150	\$920	review and draft edits to draft mtn for interlocutory appeal	Other Motions
9/11/2024	Mark Johnson	0.7	\$1,150	\$805	work on submission to judge Beeler re discovery status and extension of mtn deadline	Other Motions
9/11/2024	Rachel Steyer	1.4	\$750	\$1,050	attempted class outreach, leaving VMs, updating and reviewing notes in spreadsheet	Class Outreach and Contact
9/11/2024	Rachel Steyer	2.2	\$750	\$1,650	further review of production to go over and review any identifying or missing categories of docs	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/11/2024	Rachel Steyer	1.6	\$750	\$1,200	reviewing and proofreading draft reply re 1292 interlocutory appeal	Other Motions
9/11/2024	Travis Close	0.6	\$850	\$510	Doug Cross Depo travel - Uber ride to airport	Depositions
9/11/2024	Travis Close	3.7	\$850	\$3,145	Doug Cross Depo travel - check-in, boarding, flight from SEA to OAK	Depositions
9/11/2024	Travis Close	0.8	\$850	\$680	Doug Cross Depo travel - BART to Macarthur station; Lyft bike rental to SWCK Emeryville office	Depositions
9/11/2024	Travis Close	3.5	\$850	\$2,975	Depo prep #6 - Final preparation session with Douglas Cross before deposition	Depositions
9/12/2024	Guy Wallace	2.4	\$1,350	\$3,240	revise and edit draft reply brief re motion for appeal pursuant to Section 1292	Appeal
9/12/2024	Guy Wallace	1.9	\$1,350	\$2,565	revise and edit final draft of reply brief re motion for interlocutory appeal	Appeal
9/12/2024	Guy Wallace	2.7	\$1,350	\$3,645	revise and edit final draft of reply brief re motion for appeal pursuant to Section 1292	Appeal
9/12/2024	Guy Wallace	0.8	\$1,350	\$1,080	com's with JRA; JAU; RLS re reply brief re motion for appeal pursuant to Section 1292	Appeal
9/12/2024	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ; TCC re results of Cross deposition	Depositions
9/12/2024	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re deposition of Cross	Experts (Including Retention)
9/12/2024	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of draft submission re status for MJ Beeler; revise and edit same; com's with MTJ re same	Other Motions
9/12/2024	Jennifer Bybee	1.5	\$925	\$1,388	Edit and revise reply brief re 1292 appeal	Other Motions
9/12/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re filing status and next steps re reply brief	Other Motions
9/12/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re status update	Other Motions
9/12/2024	Jennifer Bybee	1.2	\$925	\$1,110	Final edit of Reply brief	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/12/2024	Mark Johnson	0.8	\$1,150	\$920	com w/ GBW re draft mtn for interlocutory appeal under 1292; issues related to Saad deposition, scope of discovery to seek and identity in submission to judge Beeler	Case Organization, Planning and Strategy
9/12/2024	Mark Johnson	0.9	\$1,150	\$1,035	Calls w/ GBW re reply iso mtn for interlocutory appeal, progress of Cross depo, draft statement re discovery, expert deposition schedule,	Case Organization, Planning and Strategy
9/12/2024	Mark Johnson	0.3	\$1,150	\$345	emails and calls w/ TCC re Cross depo during breaks and after the depo	Depositions
9/12/2024	Mark Johnson	3.0	\$1,150	\$3,450	work on outline for Doug Anderson depo and review docs for same	Depositions
9/12/2024	Mark Johnson	1.5	\$1,150	\$1,725	draft section of discovery update per order of MJ Beeler	Other Motions
9/12/2024	Mark Johnson	0.5	\$1,150	\$575	review and incorporate edits from coc to discovery update; com, finalize and send to OC	Other Motions
9/12/2024	Mark Johnson	0.4	\$1,150	\$460	coms w/ Bertino and Jacobsen re stipulations re expert depo schedule and filing of discovery update with Judge Beeler	Pleadings and Motions Re: Pleadings
9/12/2024	Rachel Steyer	1.3	\$750	\$975	attempted class outreach, leaving VMs, updating and reviewing notes	Class Outreach and Contact
9/12/2024	Rachel Steyer	0.3	\$750	\$225	call with daughter of former resident, could not recall details re FSP	Class Outreach and Contact
9/12/2024	Rachel Steyer	0.2	\$750	\$150	editing and proofreading draft MTJ discovery update letter	Discovery (Non-Deposition)
9/12/2024	Rachel Steyer	2.0	\$750	\$1,500	finalizing separate exhibit A barriers report for 2019 reports	Experts (Including Retention)
9/12/2024	Rachel Steyer	0.3	\$750	\$225	proofreading and editing draft reply brief for interlocutory appeal	Other Motions
9/12/2024	Travis Close	0.4	\$850	\$340	Review, analyze, propose revisions for draft letter to Judge Beeler re: discovery update	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/12/2024	Travis Close	8.5	\$850	\$7,225	Defending deposition of Douglas Cross	Depositions
9/13/2024	Guy Wallace	1.7	\$1,350	\$2,295	analysis of issues re whether and when Defendants produced 2024 assessment data to Plaintiffs	Class Certification
9/13/2024	Guy Wallace	2.1	\$1,350	\$2,835	review and analysis of Defendants' reply brief re decertification and Rutner Reply Declaration; com's with MTJ re same (.8)	Class Certification
9/13/2024	Guy Wallace	0.2	\$1,350	\$270	com's with PK; LP; ST re scheduling depo preparation	Depositions
9/13/2024	Guy Wallace	1.3	\$1,350	\$1,755	zoom with GG; JY; BBK; AS; KS; BU; MTJ; TCC; RLS re settlement; trial time estimate; opposition to D's MSJ; issues re Defendants' decertification motion and Rutner Reply Declaration	Trial and Pretrial Preparation
9/13/2024	Mark Johnson	1.2	\$1,150	\$1,380	team video conference re objections to reply brief iso decert motion, Daubert Mts, trial time estimates, Omole depo, opp to MSJ, settlement demand and brief. Plaintiff search for Brookdale. [Attending: Stilber, Johnson, Spiegel, Grunfeld, Steyer, Edmundson, Wallace, Yelin, Umpierre, Bien-Kahn, Munoz, Close.]	Case Organization, Planning and Strategy
9/13/2024	Mark Johnson	0.4	\$1,150	\$460	separate email coms w/ OC re Omole deposition, Anderson deposition, extension of Daubert deadline.	Case Organization, Planning and Strategy
9/13/2024	Mark Johnson	3.0	\$1,150	\$3,450	work on Anderson depo outline	Depositions
9/13/2024	Mark Johnson	0.7	\$1,150	\$805	call w/ GBW re arguments iso objections to D reply brief on decert motion, underlying facts re same, strategy for making arguments	Other Motions
9/13/2024	Mark Johnson	1.1	\$1,150	\$1,265	search for late-produced assessment docs, including review of spreadsheets listed on Ex B to Saad 5-13 declaration, convert same for recording analysis; draft emails to COC re results of search, potential productions to review, prior analysis	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/13/2024	Mark Johnson	0.2	\$1,150	\$230	further com w/ GBW re assessment data and objections to D's reply brief iso decert.	Other Motions
9/13/2024	Mark Johnson	1.2	\$1,150	\$1,380	calls w/ GBW (x4) re assessment data and other documents Ds produced or claimed to produce, timing of same related to objections to reply evidence iso decert motion	Other Motions
9/13/2024	Mark Johnson	0.7	\$1,150	\$805	update and revise pre-trial calendar and task entries, review prior orders and communications re same; com w/ COC A Spiegel re same and incorporate corrections additions, circulate to group.	Pleadings and Motions Re: Pleadings
9/13/2024	Rachel Steyer	1.2	\$750	\$900	weekly zoom meeting with RBGG, BSU, MTJ, GBW, TCC to review and discuss ongoing tasks and assignments	Case Organization, Planning and Strategy
9/13/2024	Rachel Steyer	2.6	\$750	\$1,950	attempted class outreach, left VMs, updating and reviewing notes in spreadsheet	Class Outreach and Contact
9/13/2024	Rachel Steyer	0.9	\$750	\$675	researching into representations made in Rutner declaration re defendnat productions	Discovery (Non-Deposition)
9/13/2024	Rachel Steyer	0.3	\$750	\$225	reviewing cases circulated by MTJ re those cited by defendants re reply evidence	Misc. Research
9/13/2024	Travis Close	1.2	\$850	\$1,020	Weekly meeting with MTJ, RLS, GBW, and co-counsel discussing MSJ, Daubert motions, follow-up discovery, MILs, and trial prep	Case Organization, Planning and Strategy
9/13/2024	Travis Close	0.2	\$850	\$170	Email to JY re: emergency evacuation research & Kailes depo transcript	Case Organization, Planning and Strategy
9/13/2024	Travis Close	1.2	\$850	\$1,020	Cross depo - travel from hotel to airport (Bay wheels e-bike to BART, then to Oakland airport)	Depositions
9/13/2024	Travis Close	3.6	\$850	\$3,060	Douglas Cross depo -- flight from OAK To SEA (check-in, boarding, flight)	Depositions
9/13/2024	Travis Close	1.5	\$850	\$1,275	Cross deposition -- travel from Airport to home (Link light rail, then 45 bus)	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/14/2024	Guy Wallace	0.3	\$1,350	\$405	com's with BU re Defendants' model of the "current" class members; whether it was feasible for Plaintiffs' to prepare an independent analysis on or after August 15, 2024 (production of "key"); assessment data that would be necessary for Plaintiffs' analysis	Class Certification
9/14/2024	Guy Wallace	1.6	\$1,350	\$2,160	revise and edit draft objection to improper reply evidence prepared by JY; com's with GG; JY; MTJ re same	Class Certification
9/14/2024	Mark Johnson	1.0	\$1,150	\$1,150	email coms w/ GBW, J Yelin, R Bonner, Blake Peters re objections to reply iso class decert mtn, review and research re missing production	Class Certification
9/14/2024	Mark Johnson	0.4	\$1,150	\$460	calls w/ GBW re missing production, objections to reply brief on decert motion, edits to same	Other Motions
9/14/2024	Mark Johnson	0.5	\$1,150	\$575	review and propose edits to written objections to reply brief iso decert mtn	Other Motions
9/15/2024	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of prior mediation statements; preparation of further settlement position	Settlement
9/16/2024	Guy Wallace	0.3	\$1,350	\$405	com's with BBK re MSJ opposition and issue of successor liability for new construction and alterations violations	Motion for Summary Judgment / Adjudication
9/16/2024	Guy Wallace	0.7	\$1,350	\$945	preparation for hearing of motion for relief pursuant to Section 1292(b); com's with JRA re same	Other Motions
9/16/2024	Guy Wallace	2.4	\$1,350	\$3,240	review and analysis of Defendants' section of update for MJ Beeler; preparation of Plaintiffs' responsive section re same; com's with GG; JY; MTJ; TCC re same (.7)	Other Motions
9/16/2024	Guy Wallace	2.2	\$1,350	\$2,970	preparation and drafting of letter to Rutner re Plaintiffs' settlement demand	Settlement
9/16/2024	Guy Wallace	0.9	\$1,350	\$1,215	com's with GG re draft settlement letter to Rutner; revise and edit same	Settlement

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/16/2024	Rachel Steyer	1.3	\$750	\$975	attempted class outreach, leaving VMs, updating and reviewing notes in spreadsheet	Class Outreach and Contact
9/16/2024	Rachel Steyer	0.2	\$750	\$150	spoke w/son of former resident, no FSP issues	Class Outreach and Contact
9/16/2024	Rachel Steyer	0.2	\$750	\$150	spoke w/son of former resident, no FSP issues	Class Outreach and Contact
9/16/2024	Rachel Steyer	0.2	\$750	\$150	reviewing defendants portion of discovery update letter	Discovery (Non-Deposition)
9/16/2024	Rachel Steyer	1.6	\$750	\$1,200	reviewing Anderson cases, preparing summary	Experts (Including Retention)
9/16/2024	Rachel Steyer	2.8	\$750	\$2,100	reviewing Saad expert production, filling out internal spreadsheet with additional data	Experts (Including Retention)
9/16/2024	Rachel Steyer	0.2	\$750	\$150	proofreading JSY draft objection to improper reply evidence	Other Motions
9/16/2024	Travis Close	1.4	\$850	\$1,190	Review and analyze deposition of Douglas Cross for transcription errors	Case Organization, Planning and Strategy
9/16/2024	Travis Close	0.2	\$850	\$170	Email to team re: finalization of discovery update for Judge Beeler	Case Organization, Planning and Strategy
9/16/2024	Travis Close	0.3	\$850	\$255	Call with GBW re: discovery letter update	Case Organization, Planning and Strategy
9/16/2024	Travis Close	0.5	\$850	\$425	Review, analyze, and propose revisions to draft discovery update for Judge Beeler	Discovery (Non-Deposition)
9/16/2024	Travis Close	1.7	\$850	\$1,445	Review, analyze, and summarize alterations identified & relied upon by Anderson in his expert report -- Brookhurst	Experts (Including Retention)
9/16/2024	Travis Close	0.5	\$850	\$425	Review and analyze Andersons' expert report & attached materials for info on facility alterations analyzed	Experts (Including Retention)
9/16/2024	Travis Close	1.4	\$850	\$1,190	Review, analyze, and summarize alterations identified & relied upon by Anderson in his expert report -- Fountaingrove	Experts (Including Retention)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/16/2024	Travis Close	0.8	\$850	\$680	Review, analyze, and summarize alterations identified & relied upon by Anderson in his expert report -- Hemet	Experts (Including Retention)
9/16/2024	Travis Close	0.3	\$850	\$255	Email to June Kailes re: declaration needed for opposition to motion for summary judgment	Motion for Summary Judgment / Adjudication
9/17/2024	Guy Wallace	0.9	\$1,350	\$1,215	com's with JGT; BU; RLS re Defendants' various class list documents and differing numbers re subclass groups	Class Certification
9/17/2024	Guy Wallace	0.3	\$1,350	\$405	com's with BBK; Waters; Mastin re preparation of opposition to Defendants' MSJ	Motion for Summary Judgment / Adjudication
9/17/2024	Guy Wallace	0.8	\$1,350	\$1,080	revise and edit draft of update submission for MJ Beeler; review and analysis of Defendants' revised portion; com's with Rutner; Bertino re same (.2)	Other Motions
9/17/2024	Guy Wallace	0.5	\$1,350	\$675	revise and edit settlement demand letter to ER	Settlement
9/17/2024	Rachel Steyer	0.6	\$750	\$450	attempted class outreach, leaving VMs, updating and reviewing notes in spreadsheet	Class Outreach and Contact
9/17/2024	Rachel Steyer	0.6	\$750	\$450	additional research into Anderson cases that he listed in CV	Experts (Including Retention)
9/17/2024	Rachel Steyer	1.3	\$750	\$975	further review of remaining Saad expert docs, updating sheet for MTJ	Experts (Including Retention)
9/17/2024	Travis Close	1.8	\$850	\$1,530	Legal research re: ADA cases where it was found that a public accommodation's services/policies were subject to Title III	Case Organization, Planning and Strategy
9/17/2024	Travis Close	0.8	\$850	\$680	Research regulations promulgated by DOT/DOJ implementing Title III of the ADA as applied to public accommodations	Case Organization, Planning and Strategy
9/17/2024	Travis Close	0.4	\$850	\$340	Review and analyze plaintiffs' objections to defendants' reply evidence	Case Organization, Planning and Strategy
9/17/2024	Travis Close	0.3	\$850	\$255	Review and analyze joint discovery update (as filed)	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/17/2024	Travis Close	1.5	\$850	\$1,275	Review and analyze deposition of June Kailes for transcription errors	Depositions
9/17/2024	Travis Close	0.2	\$850	\$170	Email to JIK re: deposition transcript for review	Experts (Including Retention)
9/17/2024	Travis Close	0.2	\$850	\$170	Email to Doug Cross re: deposition transcript for review	Experts (Including Retention)
9/17/2024	Travis Close	0.2	\$850	\$170	Email to Doug Cross re: notes needed for scanning following Thursday's deposition	Experts (Including Retention)
9/17/2024	Travis Close	0.6	\$850	\$510	Review, analyze, and summarize renovations/alterations made to San Ramon dining room in 2003 based on plans relied upon by Anderson	Experts (Including Retention)
9/18/2024	Guy Wallace	1.5	\$1,350	\$2,025	preparation for hearing on motion for decertification; review and analysis of the parties' papers	Class Certification
9/18/2024	Guy Wallace	1.6	\$1,350	\$2,160	review and analysis of Defendants' reply brief re decertification	Class Certification
9/18/2024	Guy Wallace	0.4	\$1,350	\$540	com's with GG; JY re preparation for hearing on motion for decertification	Class Certification
9/18/2024	Guy Wallace	1.2	\$1,350	\$1,620	com's with TCC; RLS re Defendants' documents re class lists; analysis of same; facility capacity; preparation for hearing re decertification	Class Certification
9/18/2024	Guy Wallace	2.1	\$1,350	\$2,835	preparation for hearing on motion re decertification; com's with BU re same	Class Certification
9/18/2024	Guy Wallace	0.4	\$1,350	\$540	com's with JRA re preparation for hearing on motion re relief under Section 1292(b)	Other Motions
9/18/2024	Guy Wallace	0.7	\$1,350	\$945	com's with Sonia Chopra; GG; JY re NJP assistance with focus group	Trial and Pretrial Preparation
9/18/2024	Rachel Steyer	2.7	\$750	\$2,025	attempted class outreach, leaving VMs, updating and reviewing notes in spreadsheet	Class Outreach and Contact
9/18/2024	Rachel Steyer	0.2	\$750	\$150	call with daughter of former resident, no FSP issues	Class Outreach and Contact
9/18/2024	Rachel Steyer	0.2	\$750	\$150	call with daughter of former resident, no FSP issues	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/18/2024	Rachel Steyer	0.2	\$750	\$150	response to GBW, BSU, RAB, JT re info about current 2024 residents and arbitration status	Misc. Research
9/18/2024	Rachel Steyer	0.2	\$750	\$150	reviewing dates of residency agreements re GBW questions for hearing prep	Other Motions
9/18/2024	Rachel Steyer	0.6	\$750	\$450	call with GBW to discuss Saad analysis, key, resident arbitration info/assessment data for hearing prep	Other Motions
9/18/2024	Rachel Steyer	0.2	\$750	\$150	gathering Saad and Flores docs for GBW for hearing prep	Other Motions
9/18/2024	Travis Close	1.5	\$850	\$1,275	Review, analyze, and summarize alterations at San Ramon Facility relied upon by Anderson in his expert report -- New Building "A" and 2016 renocations	Case Organization, Planning and Strategy
9/18/2024	Travis Close	0.5	\$850	\$425	Research requirements in CBC for smoke barrier additions in facilities as condition for housing non-ambulatory residents	Case Organization, Planning and Strategy
9/18/2024	Travis Close	0.4	\$850	\$340	Call with GBW re: defendants' previous arguments regarding burden in determining makeup of class	Case Organization, Planning and Strategy
9/18/2024	Travis Close	0.7	\$850	\$595	Review and analyze testimony from Flores in prior declarations, expert reports & rebuttal reports re: deficiencies in class member info produced by Defendants	Case Organization, Planning and Strategy
9/18/2024	Travis Close	1.9	\$850	\$1,615	Review, analyze, and summarize history of Defendants' representations re: burden of producing FSP class member information	Discovery (Non-Deposition)
9/18/2024	Travis Close	0.4	\$850	\$340	Call with June Kailes re: deposition analysis assignment & declaration for opposition to MSJ	Motion for Summary Judgment / Adjudication
9/19/2024	Guy Wallace	5.6	\$1,350	\$7,560	preparation of hearing notes for hearing on Defendants' motion for decertification; Plaintiffs' motion for review under Section 1292(b)	Class Certification
9/19/2024	Guy Wallace	0.4	\$1,350	\$540	com's with BU and preparation for hearing on motion for decertification	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/19/2024	Guy Wallace	1.4	\$1,350	\$1,890	hearing re Defendants' motion for decertification; Plaintiffs' motion for relief under Section 1292; com's with GG; JY re results of same	Class Certification
9/19/2024	Rachel Steyer	3.0	\$750	\$2,250	attempted class outreach, leaving VMs, updating and reviewing notes in spreadsheet	Class Outreach and Contact
9/19/2024	Rachel Steyer	0.2	\$750	\$150	call with declarant Lisa Follmer, provided case status update	Class Outreach and Contact
9/19/2024	Rachel Steyer	1.5	\$750	\$1,125	further review and research into Anderson consulting services	Depositions
9/19/2024	Travis Close	0.2	\$850	\$170	Email to LEC re: requesting transcript for Jeff Mastin deposition	Case Organization, Planning and Strategy
9/19/2024	Travis Close	1.4	\$850	\$1,190	Legal research regarding standards for calculating numerosity of people with disabilities for future class members	Case Organization, Planning and Strategy
9/19/2024	Travis Close	0.9	\$850	\$765	Analyze & update changes to assisted living facility capacities at Brookdale facilities in California since 2020	Case Organization, Planning and Strategy
9/19/2024	Travis Close	1.1	\$850	\$935	Review and analyze notes & documents scanned by Douglas Cross to determine privileged communications, discoverable materials	Experts (Including Retention)
9/20/2024	Guy Wallace	0.7	\$1,350	\$945	preparation of section of PSJ opposition re Plaintiffs' Unruh Act claims	Motion for Summary Judgment / Adjudication
9/20/2024	Guy Wallace	0.7	\$1,350	\$945	review and analysis of Defendants' motion for summary judgment	Motion for Summary Judgment / Adjudication
9/20/2024	Guy Wallace	0.8	\$1,350	\$1,080	preparation and drafting of stipulation and order re Dr. Kennedy's deposition and schedule re Daubert motions re same; com's with ER; Dr. Kennedy re same	Other Motions
9/20/2024	Rachel Steyer	1.8	\$750	\$1,350	attempting class outreach, leaving VMs, updating and reviewing notes in spreadsheet	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/20/2024	Travis Close	1.4	\$850	\$1,190	Review, analyze, and summarize construction alterations relied upon by Anderson for Scotts Valley - 2010 alterations	Case Organization, Planning and Strategy
9/20/2024	Travis Close	1.5	\$850	\$1,275	Review, analyze, and summarize construction alterations relied upon by Anderson for Scotts Valley - 1999 alterations	Case Organization, Planning and Strategy
9/20/2024	Travis Close	1.7	\$850	\$1,445	Legal research on standards for qualification of construction hardship exemption under CBC, Chapter 11B	Case Organization, Planning and Strategy
9/20/2024	Travis Close	0.8	\$850	\$680	Legal research on cases interpreting undue hardship exception for accessible building elements in alterations under CBC	Case Organization, Planning and Strategy
9/20/2024	Travis Close	1.4	\$850	\$1,190	Review, analyze, and summarize construction alterations relied upon by Anderson for Tracy - 2019 alterations	Experts (Including Retention)
9/21/2024	Guy Wallace	1.4	\$1,350	\$1,890	legal research and analysis re Defendants' use of Rule 56 to make arguments about the insufficiency of Plaintiffs' pleadings as opposed to filing a motion under Rule 12(c)	Motion for Summary Judgment / Adjudication
9/21/2024	Guy Wallace	2.1	\$1,350	\$2,835	legal research and analysis re intentionality claims under the Unruh Act, including Ninth Circuit and California appellate cases re same	Motion for Summary Judgment / Adjudication
9/21/2024	Guy Wallace	3.8	\$1,350	\$5,130	preparation and drafting of preliminary outline of responsive points re Defendants' MSJ re Unruh Act claim	Motion for Summary Judgment / Adjudication
9/21/2024	Guy Wallace	2.2	\$1,350	\$2,970	preparation and drafting of section of opposition brief re Defendants' motion for summary judgment with respect to Plaintiffs' Unruh Act claims	Motion for Summary Judgment / Adjudication
9/22/2024	Guy Wallace	0.6	\$1,350	\$810	preparation of outline of summary judgment opposition declarations of Waters; Mastin	Motion for Summary Judgment / Adjudication

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/22/2024	Mark Johnson	6.1	\$1,150	\$7,015	work on prep for Anderson depo, drafting outline re same	Depositions
9/23/2024	Guy Wallace	0.7	\$1,350	\$945	review and analysis of rebuttal report of Julie Baird; review and analysis of draft depo outline from BU; com's with BU re same	Depositions
9/23/2024	Guy Wallace	2.3	\$1,350	\$3,105	review and analysis of MTJ draft depo outline for Anderson; preparation of additional topics and questions for same	Depositions
9/23/2024	Guy Wallace	1.3	\$1,350	\$1,755	review and analysis of Anderson rebuttal report	Experts (Including Retention)
9/23/2024	Guy Wallace	1.2	\$1,350	\$1,620	review and analysis of draft readily achievable barrier removal lists from Mastin; draft argument re readily achievable in PSJ Opposition; Lopez v. Catalina	Motion for Summary Judgment / Adjudicaiton
9/23/2024	Guy Wallace	4.6	\$1,350	\$6,210	preparation and drafting of section of PSJ opposition brief re Defendants' challenge to Plaintiffs Unruh Act claims	Motion for Summary Judgment / Adjudicaiton
9/23/2024	Guy Wallace	0.5	\$1,350	\$675	zoom with GG; JY; BBK; AS; BM; KS; BU; MTJ; TCC; RLS re preparation of opposition to Defendants' motion for summary judgment	Motion for Summary Judgment / Adjudicaiton
9/23/2024	Guy Wallace	2.2	\$1,350	\$2,970	preparation and drafting of section re Defendants motion for summary judgment re Plaintiffs' Unruh Act claim; revise and edit same	Motion for Summary Judgment / Adjudicaiton
9/23/2024	Mark Johnson	8.0	\$1,150	\$9,200	prep for Anderson depo, including adding to and revising outline, review of documents, coms w/ GBW, integrate questions from GBW	Depositions
9/23/2024	Mark Johnson	0.4	\$1,150	\$460	team video conference re planning completion of opposition to MSJ, daubert motion deadlines, Anderson depo.	Other Motions
9/23/2024	Mark Johnson	1.0	\$1,150	\$1,150	review draft of opposition to mtn for summary judgment	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/23/2024	Rachel Steyer	0.5	\$750	\$375	zoom with RBGG, BSU, MTJ, JUB, GBW, TCC to review and discuss ongoing tasks and assignments	Case Organization, Planning and Strategy
9/23/2024	Rachel Steyer	0.5	\$750	\$375	received call back from daughter of current resident, discussed case, answered questions	Class Outreach and Contact
9/23/2024	Rachel Steyer	6.0	\$750	\$4,500	further review and research into Anderson cases, locating reports	Experts (Including Retention)
9/23/2024	Travis Close	0.5	\$850	\$425	Review, analyze, and revise declaration of June Kailes in support of plaintiffs' opposition to motion for summary judgment	Case Organization, Planning and Strategy
9/23/2024	Travis Close	1.6	\$850	\$1,360	Legal research on bases for excluding expert testimony under Daubert factors	Case Organization, Planning and Strategy
9/23/2024	Travis Close	1.4	\$850	\$1,190	Legal research on whether how testimony may be denied under Daubert standard as improper lay testimony	Case Organization, Planning and Strategy
9/23/2024	Travis Close	1.6	\$850	\$1,360	Review and analyze records from plaintiff Schmidt (Tracy) to determine evidence of room numbers where he resided; compare to rooms inspected in expert reports	Case Organization, Planning and Strategy
9/23/2024	Travis Close	0.7	\$850	\$595	Analyze evidence of vision barriers found in common areas of Tracy that may have been encountered by plaintiff Schmidt	Case Organization, Planning and Strategy
9/23/2024	Travis Close	1.4	\$850	\$1,190	Review and analyze draft opposition to motion for summary judgment	Motion for Summary Judgment / Adjudicaiton
9/24/2024	Guy Wallace	0.7	\$1,350	\$945	com's with MTJ re deposition of Anderson and further questions and topics re same	Depositions
9/24/2024	Guy Wallace	0.3	\$1,350	\$405	com's with BU re deposition of Baird and results thereof	Depositions
9/24/2024	Guy Wallace	0.8	\$1,350	\$1,080	revise and edit draft declaration of Mastin in opposition to Defendants' MSJ	Motion for Summary Judgment / Adjudicaiton

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/24/2024	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of draft opposition to Defendants' MSJ; com's with BBK re same (.3)	Motion for Summary Judgment / Adjudicaiton
9/24/2024	Guy Wallace	1.0	\$1,350	\$1,350	revise and edit draft stipulation and proposed order re Daubert motions; com's with ER re same	Other Motions
9/24/2024	Guy Wallace	0.7	\$1,350	\$945	review and analysis of Defendants' letter re settlement	Settlement
9/24/2024	Mark Johnson	7.0	\$1,150	\$8,050	deposition of Doug Anderson (5 hours) including wait time, discussions off the record, review of documents during breaks, etc.	Depositions
9/24/2024	Mark Johnson	1.2	\$1,150	\$1,380	depo prep and set up before Anderson depo	Depositions
9/24/2024	Mark Johnson	0.2	\$1,150	\$230	call and email w/ GBW re Anderson depo	Depositions
9/24/2024	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW re settlement letter from OC	Settlement
9/24/2024	Mark Johnson	0.2	\$1,150	\$230	review and analyze D settlement letter	Settlement
9/24/2024	Rachel Steyer	1.9	\$750	\$1,425	attempted class outreach, leaving VMs, updating and reviewing notes in spreadsheet	Class Outreach and Contact
9/24/2024	Rachel Steyer	0.3	\$750	\$225	received call back from daughter in law of former resident, no FSP issues	Class Outreach and Contact
9/24/2024	Rachel Steyer	0.2	\$750	\$150	reviewing summary from TCC of facility barrier alterations relied up on by Anderson	Experts (Including Retention)
9/24/2024	Rachel Steyer	0.2	\$750	\$150	response to BBK re Schmidt unit inspection info	Experts (Including Retention)
9/24/2024	Rachel Steyer	1.5	\$750	\$1,125	proofreading and reviewing reply PMSJ	Other Motions
9/24/2024	Travis Close	6.5	\$850	\$5,525	Deposition of Douglas Anderson, Part I (9:00am-4:15pm)	Depositions
9/24/2024	Travis Close	0.3	\$850	\$255	Calls with MTJ re: progress and strategy for Anderson deposition	Depositions
9/24/2024	Travis Close	0.8	\$850	\$680	Prep for today's deposition of Douglas Anderson (review prepared outline and rebuttal report)	Experts (Including Retention)
9/25/2024	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ re results of second deposition session of Anderson	Depositions
9/25/2024	Guy Wallace	3.2	\$1,350	\$4,320	revise and edit draft opposition to Defendants' MSJ	Motion for Summary Judgment / Adjudicaiton

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/25/2024	Guy Wallace	2.1	\$1,350	\$2,835	revise and draft brief in opposition to Defendants' MSJ; Mastin Declaration re same	Motion for Summary Judgment / Adjudicaiton
9/25/2024	Guy Wallace	0.4	\$1,350	\$540	zoom with JY; BBK; AS; BM; BU; MTJ; TCC; RLS re preparation of summary judgment opposition; Daubert motions and oppositions thereto	Motion for Summary Judgment / Adjudicaiton
9/25/2024	Guy Wallace	0.5	\$1,350	\$675	com's with BBK re revisions to Mastin and Waters Declarations	Motion for Summary Judgment / Adjudicaiton
9/25/2024	Guy Wallace	0.4	\$1,350	\$540	com's with BU re Daubert motion re Josh Allen	Other Motions
9/25/2024	Guy Wallace	0.7	\$1,350	\$945	com's with GG; JY; MTJ re letter to clients re Defendants' settlement offer; further steps re mediation process with MJ Spero	Settlement
9/25/2024	Mark Johnson	2.0	\$1,150	\$2,300	Day 2 of Anderson depo	Depositions
9/25/2024	Mark Johnson	2.5	\$1,150	\$2,875	depo prep for day 2 of Anderson depo, consoldate notes, com w/ GBW,	Depositions
9/25/2024	Mark Johnson	0.5	\$1,150	\$575	coms w/ COC and court reporter re Anderson depo and testimony supportive of opposition to MSJ	Other Motions
9/25/2024	Mark Johnson	0.4	\$1,150	\$460	research re Unruh Act and Senior housing based on Anderson depo testimony.	Other Motions
9/25/2024	Rachel Steyer	0.2	\$750	\$150	brief check with RBGG and GBW, BSU to review and discuss tasks and assignments re Dauberts and finalizing PMSJ reply	Case Organization, Planning and Strategy
9/25/2024	Rachel Steyer	0.2	\$750	\$150	spoke w/former resident, scheduled intake call	Class Outreach and Contact
9/25/2024	Rachel Steyer	1.4	\$750	\$1,050	attempted class outreach, leaving VMs, reviewing and updating notes in spreadsheet	Class Outreach and Contact
9/25/2024	Rachel Steyer	0.2	\$750	\$150	call with son of former resident, no FSP issues	Class Outreach and Contact
9/25/2024	Rachel Steyer	0.2	\$750	\$150	call with son of former resident, no FSP issues	Class Outreach and Contact
9/25/2024	Rachel Steyer	0.2	\$750	\$150	call with son of former resident, no FSP issues	Class Outreach and Contact
9/25/2024	Rachel Steyer	0.2	\$750	\$150	call with son of former resident, no FSP issues	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/25/2024	Travis Close	0.4	\$850	\$340	Final edits to declaration of June Kailes in support of opposition to motion for summary judgment; send to Kailes for electronic signature	Case Organization, Planning and Strategy
9/25/2024	Travis Close	0.8	\$850	\$680	Email to co-counsel re: analysis of why Kailes decided to remove Hemet from her report & summary of evidence related to Quinlan's emergency evacuation claims	Case Organization, Planning and Strategy
9/25/2024	Travis Close	1.1	\$850	\$935	Analyze evidence of building occupancy cited by Anderson as found in construction history documents	Case Organization, Planning and Strategy
9/25/2024	Travis Close	0.3	\$850	\$255	Emails to BBK re: evidence in support of Lawrence Quinlan's emergency evacuation claim	Case Organization, Planning and Strategy
9/25/2024	Travis Close	0.8	\$850	\$680	Legal research in room & common area accessibility requirements for institutional vs. residential occupancies in California Building Code	Case Organization, Planning and Strategy
9/25/2024	Travis Close	0.3	\$850	\$255	Review and analyze evidence compiled for emergency planning for Lawrence Quinlan / Hemet facility	Case Organization, Planning and Strategy
9/25/2024	Travis Close	0.6	\$850	\$510	Prep for deposition of Douglas Anderson, Part II (review outline of questions not yet answered; review construction history evidence and exhibit 6 barrier analysis chart)	Depositions
9/25/2024	Travis Close	2.3	\$850	\$1,955	Attend remote deposition of Douglas Anderson, Part II	Depositions
9/25/2024	Travis Close	0.3	\$850	\$255	Call with June Kailes re: changes to Kailes declaration in support of opposition to motion for summary judgment	Motion for Summary Judgment / Adjudication
9/25/2024	Travis Close	0.4	\$850	\$340	Review and analyze latest draft of opposition to MSJ (including updated introduction and emergency evacuation section)	Motion for Summary Judgment / Adjudication
9/25/2024	Travis Close	0.2	\$850	\$170	Call to JIK re: issues with signing declaration in support of Opp. to MSJ	Motion for Summary Judgment / Adjudication

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/26/2024	Guy Wallace	0.6	\$1,350	\$810	com's with BBK re Plaintiffs' opposition to Defendants' MSJ; review and analysis of same	Motion for Summary Judgment / Adjudication
9/26/2024	Guy Wallace	0.8	\$1,350	\$1,080	revise and edit draft Daubert motion re Allen; com's with BU re same	Other Motions
9/26/2024	Guy Wallace	0.5	\$1,350	\$675	review and analysis of Defendants' motion to exclude expert testimony; com's with MTJ re same	Other Motions
9/26/2024	Guy Wallace	0.7	\$1,350	\$945	com's with GG; JY; KAS; BU; MTJ re settlement	Settlement
9/26/2024	Rachel Steyer	1.7	\$750	\$1,275	attempted class outreach, leaving VMs, updating and reviewing notes in spreadsheet	Class Outreach and Contact
9/26/2024	Rachel Steyer	0.3	\$750	\$225	reviewing potential witness documents available in production	Discovery (Non-Deposition)
9/26/2024	Rachel Steyer	1.0	\$750	\$750	reviewing defendants Daubert motion	Other Motions
9/26/2024	Rachel Steyer	0.3	\$750	\$225	reviewing plaintiffs' Allen daubert motion	Other Motions
9/26/2024	Travis Close	0.1	\$850	\$85	Email to JY (RBGG) re: deposition transcript of Loresia Vallette	Case Organization, Planning and Strategy
9/26/2024	Travis Close	2.3	\$850	\$1,955	Review and analyze deposition transcript of June Kailes for transcription errors	Case Organization, Planning and Strategy
9/26/2024	Travis Close	1.4	\$850	\$1,190	Review and analyze deposition transcript of Loresia Vallette	Case Organization, Planning and Strategy
9/26/2024	Travis Close	0.3	\$850	\$255	Email to co-counsel re: thoughts on supplementation of June Kailes' expert report	Case Organization, Planning and Strategy
9/26/2024	Travis Close	0.2	\$850	\$170	Email to JIK re: supplementation of expert report	Case Organization, Planning and Strategy
9/26/2024	Travis Close	1.7	\$850	\$1,445	Review and analyze deposition transcript of Douglas Anderson, Parts I and II	Depositions
9/26/2024	Travis Close	1.3	\$850	\$1,105	Review and analyze evidence in record of emergency evacuation concerns from Lawrence Quinlan & Loresia Vallette	Discovery (Non-Deposition)
9/27/2024	Guy Wallace	2.7	\$1,350	\$3,645	review and analysis of Defendants' PSJ opposition; MIL re Waters; Mastin; Cross; Kailes; Barchuk	Motion for Summary Judgment / Adjudication

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/27/2024	Guy Wallace	1.1	\$1,350	\$1,485	team zoom with GG; JY; BBK; AS; BM; KS; BU; MTJ; TCC; RLS re summary judgment oppositions and preparation of reply papers; Defendants' motion to exclude five experts	Motion for Summary Judgment / Adjudication
9/27/2024	Guy Wallace	0.9	\$1,350	\$1,215	com's with BU; MTJ re preparation of opposition to Defendants' motion to exclude five experts	Other Motions
9/27/2024	Guy Wallace	0.8	\$1,350	\$1,080	com's with GG; JY; BU; MTJ re settlement	Settlement
9/27/2024	Guy Wallace	2.8	\$1,350	\$3,780	preparation of estimate of trial time; plaintiffs' potential trial witnesses	Trial and Pretrial Preparation
9/27/2024	Mark Johnson	0.8	\$1,150	\$920	video conference call w Wallace, Grunfeld, Yelin, Close, Bien-Kahn, Munoz, Spiegel, Umpierre, Stilber re analysis of D's opp to MSJ and Daubert mtn, responses to same, trial prep, settlement proceedings.	Case Organization, Planning and Strategy
9/27/2024	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW re trial witnesses and estimate of trial time.	Trial and Pretrial Preparation
9/27/2024	Rachel Steyer	0.8	\$750	\$600	weekly meeting with RBGG, BGW, MTJ, TCC, BSU to review and discuss ongoing tasks and assignments	Case Organization, Planning and Strategy
9/27/2024	Rachel Steyer	0.5	\$750	\$375	conducted partial intake call with son of former resident, scheduled follow up for later	Class Outreach and Contact
9/27/2024	Rachel Steyer	0.3	\$750	\$225	attempted class outreach, leaving VMs, updating and reviewing notes in spreadsheet	Class Outreach and Contact
9/27/2024	Rachel Steyer	0.2	\$750	\$150	call with daughter and sister of former resident, scheduled intake call	Class Outreach and Contact
9/27/2024	Rachel Steyer	1.9	\$750	\$1,425	reviewing defendants' reply re PMSJ	Other Motions
9/27/2024	Rachel Steyer	0.2	\$750	\$150	call with GBW to review trial witnesses	Trial and Pretrial Preparation
9/27/2024	Rachel Steyer	2.2	\$750	\$1,650	reviewing and preparing list of potential witnesses for GBW	Trial and Pretrial Preparation
9/27/2024	Rachel Steyer	0.2	\$750	\$150	call with GBW re emergency evacuation witnesses	Trial and Pretrial Preparation
9/27/2024	Rachel Steyer	0.2	\$750	\$150	call with GBW to review list of potential witnesses	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/27/2024	Travis Close	0.9	\$850	\$765	Team meeting with MTJ, GBW, co-counsel re: responding to Defendants' Daubert/MIL and Opp to MSJ motions, trial prep	Case Organization, Planning and Strategy
9/27/2024	Travis Close	0.3	\$850	\$255	Call with MTJ discussing next week's assignments, workload, and upcoming deadlines in the case schedule	Case Organization, Planning and Strategy
9/27/2024	Travis Close	0.9	\$850	\$765	Review and analyze Defendants' motion in Limine re: experts Mastin, Waters, Kailes, Cross	Case Organization, Planning and Strategy
9/27/2024	Travis Close	1.3	\$850	\$1,105	Review and analyze Defendants' opposition to motion for summary judgment	Motion for Summary Judgment / Adjudication
9/27/2024	Travis Close	2.7	\$850	\$2,295	Pre-trial prep -- compile, organize, and list potential exhibits for Emergency Evacuation claims	Trial and Pretrial Preparation
9/27/2024	Travis Close	2.3	\$850	\$1,955	Pre-trial prep -- compile, organize, and list potential exhibits for Transportation / FSP class claims	Trial and Pretrial Preparation
9/27/2024	Travis Close	0.2	\$850	\$170	Call with GBW re: trial prep exhibit finding assignment for emergency evacuation & transportation	Trial and Pretrial Preparation
9/28/2024	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of Defendants' Motion to Exclude testimony of five experts; com's with MTJ re same	Other Motions
9/28/2024	Mark Johnson	1.0	\$1,150	\$1,150	review and analysis of D mtn to exclude certain expert opinion	Other Motions
9/28/2024	Mark Johnson	0.5	\$1,150	\$575	calls w GBW re analysis of D mtn to exclude expert opinion, issues raised by same and strategy for response	Other Motions
9/28/2024	Mark Johnson	1.0	\$1,150	\$1,150	further review of D mtn to exclude expert opinion w/ comparison to Waters, Mastin reports and rebuttal reports, document same, email to GBW re same.	Other Motions
9/29/2024	Guy Wallace	2.1	\$1,350	\$2,835	preparation of initial estimate of trial time	Trial and Pretrial Preparation
9/29/2024	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ re estimate of trial time	Trial and Pretrial Preparation
9/29/2024	Mark Johnson	0.5	\$1,150	\$575	Review and edit draft witness list for trial	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
9/29/2024	Mark Johnson	0.7	\$1,150	\$805	calls (x3) w/ GBW re trial witness list and time estimate, settlement, trial preparation, motions in limine	Trial and Pretrial Preparation
9/29/2024	Travis Close	2.3	\$850	\$1,955	Revisions to exhibit & witness list for emergency evacuation and transportation to add authenticating witnesses	Trial and Pretrial Preparation
9/30/2024	Guy Wallace	0.5	\$1,350	\$675	com's with OC and Dr. Kennedy re depo schedule; preparation for same	Depositions
9/30/2024	Guy Wallace	0.7	\$1,350	\$945	legal research and analysis re 28 C.F.R. section 36.406(a)(5) and case law re same	Misc. Research
9/30/2024	Guy Wallace	1.3	\$1,350	\$1,755	review and analysis of Defendants' motion to exclude 5 experts; legal research and analysis re same; com's with MTJ re same (.5)	Other Motions
9/30/2024	Guy Wallace	1.6	\$1,350	\$2,160	preparation and drafting of detailed outline of motion for systemic injunctive relief; legal research and analysis re same; com's with JAU re same (.3)	Other Motions
9/30/2024	Guy Wallace	0.5	\$1,350	\$675	com's with GG; MTJ re preparation of estimate of trial time; com to Defendants' re same	Trial and Pretrial Preparation
9/30/2024	Mark Johnson	0.6	\$1,150	\$690	calls (x4) w/ GBW re opposition to D mtn to exclude expert testimony, issues raised by same.	Other Motions
9/30/2024	Rachel Steyer	2.6	\$750	\$1,950	attempted class outreach, leaving VMs, updating and reviewing notes in spreadsheet	Class Outreach and Contact
9/30/2024	Travis Close	2.7	\$850	\$2,295	Draft outline of opposition to motion in limine re: Kailes and Cross testimony	Other Motions
9/30/2024	Travis Close	0.6	\$850	\$510	Review and analyze Def's motion in limine with respect to Cross/Kailes challenged paragraphs; compare to their reports	Other Motions
9/30/2024	Travis Close	2.3	\$850	\$1,955	Legal research re: when citations to the law by an expert constitute impermissible opinion	Other Motions
9/30/2024	Travis Close	1.4	\$850	\$1,190	Legal research re: when narratives of factual information constitute improper factual narratives	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/1/2024	Guy Wallace	0.5	\$1,350	\$675	com's with Bertino; PK re deposition of PK and schedule re same	Depositions
10/1/2024	Guy Wallace	5.1	\$1,350	\$6,885	review and analysis of Defendants' motion to exclude testimony of 5 experts; preparation of arguments re same; analysis of cases cited by Defendants	Other Motions
10/1/2024	Guy Wallace	1.8	\$1,350	\$2,430	preparation and drafting of outline of opposition to Defendants' motion to exclude expert testimony	Other Motions
10/1/2024	Guy Wallace	1.2	\$1,350	\$1,620	review and analysis of Defendants' settlement proposal; com's with MTJ re same (.5)	Settlement
10/1/2024	Guy Wallace	1.1	\$1,350	\$1,485	com's with GG; JY; MTJ re preparation for settlement meeting with Defendants	Settlement
10/1/2024	Rachel Steyer	3.0	\$750	\$2,250	attempted class outreach, leaving VMs, updating and reviewing notes in spreadsheet	Class Outreach and Contact
10/1/2024	Rachel Steyer	0.3	\$750	\$225	call with son of former resident, discussed case	Class Outreach and Contact
10/1/2024	Rachel Steyer	1.8	\$750	\$1,350	reviewing cases circulated by MTJ re Daubert opposition	Misc. Research
10/1/2024	Travis Close	1.2	\$850	\$1,020	Continue drafting opposition to motion in limine re: Kailes/Cross, section: Response to "intent, motive, state of mind"	Case Organization, Planning and Strategy
10/1/2024	Travis Close	2.4	\$850	\$2,040	Continue drafting opposition to motion in limine re: Kailes/Cross, section: improper "factual narratives"	Case Organization, Planning and Strategy
10/1/2024	Travis Close	1.3	\$850	\$1,105	Legal research re: distinguishing cases cited in Defendants' section on "outside scope of expertise"	Case Organization, Planning and Strategy
10/1/2024	Travis Close	1.6	\$850	\$1,360	Legal research distinguishing cases cited in Defendants' motion in limine to support their "improper factual narrative" section	Other Motions
10/1/2024	Travis Close	1.8	\$850	\$1,530	Continue drafting outline of opposition to motion in limine re: Kailes/Cross (section: opinions "outside scope of expertise"	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/2/2024	Guy Wallace	1.2	\$1,350	\$1,620	review and analysis of PK Rule 26 report; com's with MTJ re same and preparation for deposition of PK	Depositions
10/2/2024	Guy Wallace	0.9	\$1,350	\$1,215	com's with PK re preparation for deposition	Depositions
10/2/2024	Guy Wallace	1.3	\$1,350	\$1,755	preparation and drafting of outline of opposition to Defendants' motion to exclude expert testimony; com's with BU; MTJ; TCC re same (.4)	Other Motions
10/2/2024	Guy Wallace	0.9	\$1,350	\$1,215	com's with BU; MTJ; TCC re preparation of opposition to Defendants' motion to exclude expert testimony	Other Motions
10/2/2024	Guy Wallace	0.9	\$1,350	\$1,215	prepare for and participate in settlement discussion with Defendants' counsel; Plaintiffs; GG; JY; MTJ	Settlement
10/2/2024	Guy Wallace	1.1	\$1,350	\$1,485	com's with GG; JY; MTJ; LMD re Defendants' settlement strategy re named Plaintiffs and issues re conflict	Settlement
10/2/2024	Mark Johnson	1.0	\$1,150	\$1,150	conference w/ GBW re prep for Kennedy deposition, potential questions re same.	Depositions
10/2/2024	Mark Johnson	0.7	\$1,150	\$805	video conference w/ GBW, BU, TCC re issues for opposition to motion to exclude expert witness opinion.	Other Motions
10/2/2024	Mark Johnson	0.5	\$1,150	\$575	review transcript of 9/19 hearing on decert mtn and mtn for interlocutory appeal.	Other Motions
10/2/2024	Mark Johnson	1.5	\$1,150	\$1,725	legal research re expert testimony for conclusions of law.	Other Motions
10/2/2024	Mark Johnson	2.5	\$1,150	\$2,875	Work on opposition to mtn to exclude expert testimony.	Other Motions
10/2/2024	Mark Johnson	0.6	\$1,150	\$690	calls w/ GBW re oppos to mtn to exclude expert testimony	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/2/2024	Mark Johnson	0.7	\$1,150	\$805	video conference w/ OC Rutner, Jacobsen, Bertino and Goodwin on behalf of Ds, Wallace, Grunfeld and Yellin for Ps and all Plaintiffs per order of settlement conference judge to discuss settlement.	Settlement
10/2/2024	Mark Johnson	0.6	\$1,150	\$690	review and revise proposed email to MJ Spero re settlement discussions.	Settlement
10/2/2024	Mark Johnson	0.3	\$1,150	\$345	follow up video conference w/ Wallace, Grunfeld, Yelin re settlement conference w/ OC and follow up with MJ Spero	Settlement
10/2/2024	Mark Johnson	0.7	\$1,150	\$805	calls and texts w/ S Stiner re prep for settlement conference w/ OC, tech issues re video-conferencing, test re same.	Settlement
10/2/2024	Rachel Steyer	2.6	\$750	\$1,950	attempting class outreach, leaving VMs, updating and reviewing notes in spreadsheet	Class Outreach and Contact
10/2/2024	Rachel Steyer	0.2	\$750	\$150	received call back from Wendy DeMello, discussed upcoming trial schedule and general case schedule	Trial and Pretrial Preparation
10/2/2024	Travis Close	2.3	\$850	\$1,955	draft opposition to motion in limine re: "beyond scope of expertise" of June Kailes and Douglas Cross	Case Organization, Planning and Strategy
10/2/2024	Travis Close	3.6	\$850	\$3,060	draft opposition to motion in limine re: Cross "relies on Ipse Dixit assertions"	Case Organization, Planning and Strategy
10/2/2024	Travis Close	1.5	\$850	\$1,275	Legal research re: Ninth Circuit and district court decisions post-2022 interpreting Daubert and evidentiary requirements for experts	Case Organization, Planning and Strategy
10/2/2024	Travis Close	0.4	\$850	\$340	Review and analyze transcript of 9-19-24 court hearing	Case Organization, Planning and Strategy
10/2/2024	Travis Close	0.4	\$850	\$340	Review and analyze recent complaint investigation and facility evaluation reports issued for Scotts Valley facility	Discovery (Non-Deposition)
10/2/2024	Travis Close	0.7	\$850	\$595	Meeting with GBW, MTJ, and BMU re: organization of opposition to motion to strike experts' testimony	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/3/2024	Guy Wallace	1.1	\$1,350	\$1,485	legal research and analysis re applicable standards re expert reports and factual narratives; Mannick v. Kaiser; com's with MTJ re opposition to motion to exclude	Other Motions
10/3/2024	Guy Wallace	0.7	\$1,350	\$945	legal research and analysis re Defendants' argument that Plaintiffs' proposed expert testimony invades the province of the court and/or jury	Other Motions
10/3/2024	Guy Wallace	2.3	\$1,350	\$3,105	review and analysis of Defendants' settlement letter of 9/24/24 and proposal to discuss individual settlements with named Plaintiffs during October 2 meeting; legal research and analysis re issues re preferred treatment of Plaintiffs and Class Representatives; conflict and adequacy	Settlement
10/3/2024	Guy Wallace	0.9	\$1,350	\$1,215	com's with GG; MTJ re Defendants' proposal to negotiate individual settlements with the named Plaintiffs; com to MJ Spero re same	Settlement
10/3/2024	Guy Wallace	0.9	\$1,350	\$1,215	legal research and analysis re Pick Up Stix and its progeny; non-application to Defendants' settlement conduct herein	Settlement
10/3/2024	Guy Wallace	2.4	\$1,350	\$3,240	review and analysis of Defendants' proposed submission re estimated trial time; preparation of Plaintiffs' portion of submission; com's with GG; MTJ re same	Trial and Pretrial Preparation
10/3/2024	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW re D proposed submission on trial time estimate, prior day's settlement conference w/ OC and response to same	Case Organization, Planning and Strategy
10/3/2024	Mark Johnson	0.2	\$1,150	\$230	further call w GBW re trial time estimate submission and communication w/ Spero re settlement conference	Case Organization, Planning and Strategy
10/3/2024	Mark Johnson	0.1	\$1,150	\$115	review emails from GCG and GBW re proposed communication w/ settlement judge, respond to same.	Settlement

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/3/2024	Mark Johnson	0.2	\$1,150	\$230	review email from GCG w/ attached draft correspondence to Judge Spero and draft response to same.	Settlement
10/3/2024	Mark Johnson	0.2	\$1,150	\$230	call w GCG re communication with Judge Spero	Settlement
10/3/2024	Mark Johnson	0.2	\$1,150	\$230	review and analyze D proposed submission to Court re trial estimates.	Trial and Pretrial Preparation
10/3/2024	Rachel Steyer	3.1	\$750	\$2,325	attempted class outreach, leaving VMs, updating and reviewing notes in spreadsheet	Class Outreach and Contact
10/3/2024	Rachel Steyer	0.2	\$750	\$150	received call back from daughter of current resident, discussed FSP	Class Outreach and Contact
10/3/2024	Rachel Steyer	0.2	\$750	\$150	reviewing parties' submission re trial time estimates	Trial and Pretrial Preparation
10/3/2024	Travis Close	0.2	\$850	\$170	Review and analyze parties' submission of trial time	Case Organization, Planning and Strategy
10/3/2024	Travis Close	1.5	\$850	\$1,275	Legal research re: standards for assessing reliability of "specialized knowledge" under FRE 702	Other Motions
10/3/2024	Travis Close	2.4	\$850	\$2,040	Draft section of opposition to motion in limine: Mr. Cross/Ms. Kailes do not proffer improper narratives	Other Motions
10/3/2024	Travis Close	2.2	\$850	\$1,870	Draft section of opposition to motion in limine: Plaintiffs' Experts' Opinions Are Within the Scope of Their Expertise [Kailes/Cross]	Other Motions
10/3/2024	Travis Close	2.3	\$850	\$1,955	Draft section of opposition to motion in limine: Mr. Cross's Opinion About The Risk of Injury Is Sufficient Under Governing Law	Other Motions
10/4/2024	Guy Wallace	0.7	\$1,350	\$945	prepare for deposition of Dr. Kennedy; com's with PK re same	Depositions
10/4/2024	Guy Wallace	1.3	\$1,350	\$1,755	defend deposition of Dr. Kennedy	Depositions
10/4/2024	Guy Wallace	0.4	\$1,350	\$540	legal research and analysis re issue of intentional discrimination; traditionally a question of fact; com's with BBK re same	Motion for Summary Judgment / Adjudication

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/4/2024	Guy Wallace	1.2	\$1,350	\$1,620	zoom with JY; BBK; AS: BM; KS; BU; MTJ; TCC; RLS re preparation of opposition to Defendants' MSJ; motion to exclude expert testimony	Motion for Summary Judgment / Adjudicaiton
10/4/2024	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of draft opposition section re direct threat; com's with BBK; MTJ; TCC re same	Other Motions
10/4/2024	Guy Wallace	2.6	\$1,350	\$3,510	legal research and analysis re expert testimony and ADAAG violations; review and analysis of portions of Waters Report that Defendants seek to exclude; com's with MTJ re same	Other Motions
10/4/2024	Guy Wallace	0.5	\$1,350	\$675	com's with GG; BU; MTJ re settlement	Settlement
10/4/2024	Guy Wallace	0.7	\$1,350	\$945	legal research and analysis re class settlements that prefer the named Plaintiff over the class; preparation of email to Rutner re same	Settlement
10/4/2024	Mark Johnson	0.9	\$1,150	\$1,035	video call w/ COC Wallace, Yelin, Bien-Kahn, Umpierre, Edmundson, Steyer, Munoz, Stilber re MSJ opposition, Kennedy depo recamp, settlement conference and statement, Daubert opposition, Jury consultant, trial software and depo videos.	Case Organization, Planning and Strategy
10/4/2024	Mark Johnson	0.2	\$1,150	\$230	coms w/ BBK and TCC re rply argument concerning direct threat on FSW	Motion for Summary Judgment / Adjudicaiton
10/4/2024	Mark Johnson	4.0	\$1,150	\$4,600	work on opposition to mtn to exclude expert opinions.	Other Motions
10/4/2024	Rachel Steyer	0.9	\$750	\$675	weekly meeting with RBGG, BSU, GBW, MTJ, TCC to review and discuss ongoing tasks and assignments	Case Organization, Planning and Strategy
10/4/2024	Rachel Steyer	2.7	\$750	\$2,025	attempted class outreach, left VMs, updating and reviewing notes in spreadsheet	Class Outreach and Contact
10/4/2024	Rachel Steyer	0.3	\$750	\$225	reviewing draft insert to reply PMSJ re direct threat	Other Motions
10/4/2024	Travis Close	1.0	\$850	\$850	Meeting with GBW, MTJ, RLS and co-counsel re: reply to MSJ, opposition to Daubert motions, and pre-trial strategy and coordination	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/4/2024	Travis Close	1.5	\$850	\$1,275	Analyze prior discovery requests/responses regarding information pertaining to the safety of wheelchair riders on Brookdale's transportation	Case Organization, Planning and Strategy
10/4/2024	Travis Close	1.3	\$850	\$1,105	Review, analyze, and summaries articles relied upon by Brookdale in their opposition to MSJ "direct threat" Section	Case Organization, Planning and Strategy
10/4/2024	Travis Close	1.0	\$850	\$850	Continue drafting opposition to motion in liminine: relevant background re: plaintiffs' experts - Gary Waters	Other Motions
10/4/2024	Travis Close	1.1	\$850	\$935	Continue drafting opposition to motion in liminine: relevant background re: plaintiffs' experts - Jeff Mastin	Other Motions
10/4/2024	Travis Close	1.2	\$850	\$1,020	Continue drafting opposition to motion in liminine: relevant background re: plaintiffs' experts - Douglas Cross	Other Motions
10/4/2024	Travis Close	1.1	\$850	\$935	Continue drafting opposition to motion in liminine: relevant background re: plaintiffs' experts - June Kailes	Other Motions
10/4/2024	Travis Close	0.9	\$850	\$765	Continue drafting opposition to motion in liminine: relevant background re: plaintiffs' experts - Alex Barchuk	Other Motions
10/5/2024	Guy Wallace	1.8	\$1,350	\$2,430	review and analysis of case law re ultimate conclusions of law in access cases; analysis of Waters Report re same	Other Motions
10/5/2024	Guy Wallace	2.9	\$1,350	\$3,915	preparation of sections re applicable legal standards re Defendants' critiques of Plaintiffs' expert reports; preparation of points re Waters; com's with MTJ re same (.5)	Other Motions
10/5/2024	Guy Wallace	0.7	\$1,350	\$945	review and analysis of draft section from BU re Defendants' arguments that Plaintiffs' experts invade the province of the jury / trier of fact	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/5/2024	Mark Johnson	0.4	\$1,150	\$460	calls w/ GBW re settlement conference statement, conference w/ OC on settlement and communications w/ Judge Spero, opposition to mtn to exclude expert testimony.	Case Management Conferences
10/5/2024	Mark Johnson	7.8	\$1,150	\$8,970	work on opposition to D mtn to exclude expert testimony	Other Motions
10/6/2024	Guy Wallace	0.7	\$1,350	\$945	com's with BU; MTJ; TCC re draft of opposition to Defendants' motion to exclude expert testimony; analysis of draft sections	Other Motions
10/6/2024	Guy Wallace	2.7	\$1,350	\$3,645	preparation of detailed outline of settlement conference statement	Settlement
10/6/2024	Guy Wallace	5.6	\$1,350	\$7,560	preparation and drafting of settlement conference statement	Settlement
10/6/2024	Mark Johnson	0.8	\$1,150	\$920	calls w/ GBW re settlement issues and conference w/ OC, communications with Spero re same, email from OC re conflict issue, opposition to motion to exclude expert testimony.	Case Organization, Planning and Strategy
10/6/2024	Mark Johnson	6.7	\$1,150	\$7,705	Drafting and researching opp to mtn to exclude expert opinions; review and integrate sections from COC	Other Motions
10/6/2024	Travis Close	2.4	\$850	\$2,040	Additions & revisions to assigned sections re: opposition to daubert motions (Kailes & Cross)	Other Motions
10/7/2024	Guy Wallace	0.7	\$1,350	\$945	review and analysis of drafts of sections of opposition to motion to exclude expert testimony; Burkhart case	Other Motions
10/7/2024	Guy Wallace	3.2	\$1,350	\$4,320	preparation and drafting of settlement conference statement	Settlement
10/7/2024	Guy Wallace	3.3	\$1,350	\$4,455	preparation of integrated draft of settlement conference statement; revise and edit same	Settlement
10/7/2024	Jennifer Bybee	0.1	\$925	\$93	Review emails with co-counsel re plaintiffs estimated trial time	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/7/2024	Mark Johnson	1.0	\$1,150	\$1,150	review and analyze draft reply iso partial mtn for summary judgment	Motion for Summary Judgment / Adjudicaiton
10/7/2024	Mark Johnson	1.0	\$1,150	\$1,150	review and edit draft settlement statement for settlement conference.	Settlement
10/7/2024	Rachel Steyer	2.6	\$750	\$1,950	attempted class outreach, leaving VMs, updating and reviewing notes in spreadsheet	Class Outreach and Contact
10/7/2024	Rachel Steyer	0.4	\$750	\$300	response to declarant providing case status update	Class Outreach and Contact
10/7/2024	Rachel Steyer	0.2	\$750	\$150	reviewing draft insert re Barchuk for Daubert motion	Other Motions
10/7/2024	Rachel Steyer	1.0	\$750	\$750	reviewing draft reply PMSJ, transmitting to BBK	Other Motions
10/7/2024	Rachel Steyer	0.6	\$750	\$450	beginning review of draft settlement statement	Settlement
10/7/2024	Travis Close	0.1	\$850	\$85	Email to MTJ re: scheduling meeting for MIL opposition discussion	Case Organization, Planning and Strategy
10/7/2024	Travis Close	1.8	\$850	\$1,530	Draft section of motion in limine re: intent/state of mind of Kailes/Cross	Case Organization, Planning and Strategy
10/7/2024	Travis Close	1.5	\$850	\$1,275	Legal research re: whether courts have interpreted "full and equal access" in the context of ADA as improper legal conclusion or permissible language	Case Organization, Planning and Strategy
10/7/2024	Travis Close	0.4	\$850	\$340	Review and analyze insert from co-counsel re: opposition to MIL for Dr. Barchuk's opinions	Case Organization, Planning and Strategy
10/7/2024	Travis Close	1.4	\$850	\$1,190	Legal research on definition addition vs. alteration in ADAAG/ADAS, and whether new buildings constructed qualify as additions	Case Organization, Planning and Strategy
10/7/2024	Travis Close	0.7	\$850	\$595	Review and analyze plaintiffs' reply iso motion for summary judgment	Motion for Summary Judgment / Adjudicaiton
10/7/2024	Travis Close	1.1	\$850	\$935	Review and analyze latest draft of opposition to motion in limine with discrete sections/assignments inserted	Other Motions
10/8/2024	Guy Wallace	1.1	\$1,350	\$1,485	analysis of Defendants' arguments re alterations; standing under Chapman, potential motion for clarification of class certification order	Class Certification

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/8/2024	Guy Wallace	1.2	\$1,350	\$1,620	review and analysis of draft reply brief re PSJ; revise and edit same	Motion for Summary Judgment / Adjudication
10/8/2024	Guy Wallace	3.1	\$1,350	\$4,185	revise and edit draft opposition to Defendants Motion to Exclude expert testimony	Other Motions
10/8/2024	Guy Wallace	4.3	\$1,350	\$5,805	revise and edit draft Settlement Conference Statement	Settlement
10/8/2024	Rachel Steyer	1.5	\$750	\$1,125	attempted class outreach, leaving VMs, updating and reviewing notes in spreadsheet	Class Outreach and Contact
10/8/2024	Rachel Steyer	0.3	\$750	\$225	beginning research comparing expert reports cited in briefs for responses to Daubert motion	Other Motions
10/8/2024	Rachel Steyer	1.1	\$750	\$825	completing review of draft settlement statement	Settlement
10/8/2024	Travis Close	1.7	\$850	\$1,445	Legal research re: when legal language cited by expert in opinion has a "specialized meaning"	Case Organization, Planning and Strategy
10/8/2024	Travis Close	2.4	\$850	\$2,040	Draft section of opposition to motion in limine re: Kailes - improper legal conclusions (response)	Case Organization, Planning and Strategy
10/8/2024	Travis Close	0.4	\$850	\$340	Proposed revisions to draft settlement conference statement	Case Organization, Planning and Strategy
10/8/2024	Travis Close	0.2	\$850	\$170	Review and analyze insert to opposition to motion in limine re: Dr. Barchuk - improper legal conclusions (response)	Case Organization, Planning and Strategy
10/8/2024	Travis Close	1.2	\$850	\$1,020	Legal research on when daubert motions to exclude testimony at trial are pre-mature	Case Organization, Planning and Strategy
10/8/2024	Travis Close	1.3	\$850	\$1,105	compare paragraphs/cited testimony of Kailes that are sought to be excluded in Defendants' MIL with substantive content in same paragraphs	Experts (Including Retention)
10/9/2024	Guy Wallace	1.1	\$1,350	\$1,485	analysis of arguments re San Ramon and Scotts Valley facilities and percentage of resident units to be made accessible; alteration claims and scope thereof	Misc. Research
10/9/2024	Guy Wallace	0.7	\$1,350	\$945	revise and edit draft reply brief re Plaintiffs' motion for PSJ; com's with BBK; MTJ re same	Motion for Summary Judgment / Adjudication

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/9/2024	Guy Wallace	4.3	\$1,350	\$5,805	revise and edit draft opposition to Defendants' motion to exclude expert testimony; com's with MTJ re same (.9)	Other Motions
10/9/2024	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of Defendants' motion to exclude Dr. Kennedy; com's with MTJ re same (.40)	Other Motions
10/9/2024	Rachel Steyer	2.4	\$750	\$1,800	attempted class outreach, leaving VMs, updating and reviewing notes in spreadsheet	Class Outreach and Contact
10/9/2024	Rachel Steyer	0.3	\$750	\$225	spoke w/fiduciary, discussed case, reviewed names corresponding to clients re Brookdale	Class Outreach and Contact
10/9/2024	Rachel Steyer	0.2	\$750	\$150	wrote email to attorney for former resident, providing info re case	Class Outreach and Contact
10/9/2024	Rachel Steyer	1.1	\$750	\$825	preparing further analysis of Barchuk opinions cited/sought to be excluded	Other Motions
10/9/2024	Rachel Steyer	0.3	\$750	\$225	reviewing defendants' Daubert motion re Dr. Kennedy	Other Motions
10/9/2024	Rachel Steyer	1.2	\$750	\$900	proofreading and editing opposition to Daubert motion	Other Motions
10/9/2024	Travis Close	0.8	\$850	\$680	Review and analyze latest draft of opp. to motion in limine	Case Organization, Planning and Strategy
10/9/2024	Travis Close	0.9	\$850	\$765	Revisions to Kailes section re: improper legal conclusions, condensing to a single paragraph	Case Organization, Planning and Strategy
10/9/2024	Travis Close	2.2	\$850	\$1,870	Analysis of paragraphs of Kailes Expert Report cited in Pltfs' MSJ & Opp. to Def's MSJ, compare to those sought to be excluded by Def's; compare paragraphs/specified passages to be excluded for each	Other Motions
10/9/2024	Travis Close	2.6	\$850	\$2,210	Analysis of paragraphs of Cross Expert Report cited in Pltfs' MSJ & Opp. to Def's MSJ, compare to those sought to be excluded by Def's; compare paragraphs/specified passages to be excluded for each	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/9/2024	Travis Close	1.5	\$850	\$1,275	Cite-checking latest draft of opposition to motion in limine (pages 1-14)	Other Motions
10/10/2024	Guy Wallace	1.4	\$1,350	\$1,890	review and analysis of Chapman standing of named Plaintiffs; com's with BBK re same; com's with MTJ; RLS re numbers of units in the six facilities	Misc. Research
10/10/2024	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of Defendants' reply brief re motion for summary judgment; references to ADAAG Manual	Motion for Summary Judgment / Adjudication
10/10/2024	Guy Wallace	3.7	\$1,350	\$4,995	revise and edit draft opposition to Defendants' motion to exclude expert testimony	Other Motions
10/10/2024	Guy Wallace	4.6	\$1,350	\$6,210	revise and edit final draft of opposition to Defendants' motion to exclude expert testimony; com's with BU; BM; TCC; RLS re same (1.2)	Other Motions
10/10/2024	Guy Wallace	0.3	\$1,350	\$405	com's with MTJ re Defendants' Daubert motion re PK	Other Motions
10/10/2024	Guy Wallace	0.5	\$1,350	\$675	com's with BU; TCC; RLS re preparation of declaration of MTJ re opposition to motion to exclude expert testimony and any issues re confidentiality re same	Other Motions
10/10/2024	Rachel Steyer	1.1	\$750	\$825	attempted class outreach, leaving VMs, updating and reviewing notes in spreadsheet	Class Outreach and Contact
10/10/2024	Rachel Steyer	0.2	\$750	\$150	F/U call with representative of residents, discussed case and next steps	Class Outreach and Contact
10/10/2024	Rachel Steyer	0.2	\$750	\$150	call with sister of former resident, scheduled intake call	Class Outreach and Contact
10/10/2024	Rachel Steyer	0.2	\$750	\$150	checking confidential designations for Michael Johnson depo and exhibits	Depositions
10/10/2024	Rachel Steyer	0.6	\$750	\$450	research into number of units at facilities requested by GBW	Misc. Research
10/10/2024	Rachel Steyer	2.2	\$750	\$1,650	proofreading and cite checking portion of opposition Daubert motion	Other Motions
10/10/2024	Rachel Steyer	0.2	\$750	\$150	call with GBW re finalizing Daubert opposition	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/10/2024	Rachel Steyer	0.9	\$750	\$675	reviewing defendants' reply PMSJ	Other Motions
10/10/2024	Travis Close	1.3	\$850	\$1,105	Draft declaration of MSJ in support of plaintiff's opposition to motion to exclude testimony from experts	Case Organization, Planning and Strategy
10/10/2024	Travis Close	0.3	\$850	\$255	Emails to RLS, GBW re: cite-checking assignment for opposition brief	Other Motions
10/10/2024	Travis Close	2.6	\$850	\$2,210	Cite-checking & proof-reading opposition to motion to exclude testimony (second half)	Other Motions
10/10/2024	Travis Close	1.4	\$850	\$1,190	Further revisions to opposition to motion to exclude testimony, incorporating RLS, GBW edits	Other Motions
10/10/2024	Travis Close	0.9	\$850	\$765	Analyze experts' reports & declarations already filed in the record to determine additional exhibits necessary for opposition motion	Other Motions
10/10/2024	Travis Close	0.4	\$850	\$340	Review and analyze defendants' notice, motion, exhibits re: motion to exclude report and testimony of patrick kennedy	Other Motions
10/10/2024	Travis Close	0.4	\$850	\$340	Review and analyze plaintiff's motion to exclude testimony of Def's expert Josh Allen	Other Motions
10/10/2024	Travis Close	0.3	\$850	\$255	Review and analyze final version of opposition to motion to exclude expert testimony before filing	Other Motions
10/10/2024	Travis Close	0.2	\$850	\$170	Review and analyze Def's opposition to motion to exclude Allen testimony	Other Motions
10/10/2024	Travis Close	0.2	\$850	\$170	Call with GBW re: edits, proofing, additional changes needed to opposition to motion to exclude	Other Motions
10/11/2024	Rachel Steyer	0.8	\$750	\$600	conducted intake with sister of former resident, scheduled follow up call to review additional details	Class Outreach and Contact
10/11/2024	Rachel Steyer	0.5	\$750	\$375	attempted class outreach, leaving VMs, updating and reviewing notes in spreadsheet	Class Outreach and Contact
10/11/2024	Rachel Steyer	0.6	\$750	\$450	gathering additional facility floor plan and residential unit info, reviewing production for resident rosters	Misc. Research

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/11/2024	Rachel Steyer	0.5	\$750	\$375	response to GBW, MTJ, JM, GW circulating facility docs and info re determining capacity	Misc. Research
10/11/2024	Rachel Steyer	0.4	\$750	\$300	call with TCC re looking up facility floor plans and future team assignments/responsibilities	Misc. Research
10/11/2024	Rachel Steyer	0.3	\$750	\$225	reviewing defendants' opposition to Allen Daubert motion	Other Motions
10/11/2024	Travis Close	0.5	\$850	\$425	Call to RLS re: pre-trial prep and plan for allocation of upcoming work	Case Organization, Planning and Strategy
10/11/2024	Travis Close	1.5	\$850	\$1,275	Analysis of floor plans, DSS records, other docs to determine census, unit #, and total capacity for Hemet facility	Case Organization, Planning and Strategy
10/11/2024	Travis Close	1.4	\$850	\$1,190	Analysis of floor plans, DSS records, other docs to determine census, unit #, and total capacity for Scotts Valley	Case Organization, Planning and Strategy
10/11/2024	Travis Close	0.8	\$850	\$680	Legal research checking cases cited by Defs in reply brief re: subsequent owners not liable under design & construction ADA guidelines	Case Organization, Planning and Strategy
10/11/2024	Travis Close	0.7	\$850	\$595	Legal research checking cases cited by Defs in reply brief re: intentional discrimination required under CBC	Case Organization, Planning and Strategy
10/11/2024	Travis Close	1.3	\$850	\$1,105	Analysis of floor plans, DSS records, other docs to determine census, unit #, and total capacity for Brookhurst facility	Discovery (Non-Deposition)
10/11/2024	Travis Close	0.8	\$850	\$680	Review and analyze Def's reply iso motion for summary judgment	Motion for Summary Judgment / Adjudication
10/11/2024	Travis Close	0.4	\$850	\$340	Call to MTJ re: upcoming pre-trial assignments	Trial and Pretrial Preparation
10/12/2024	Guy Wallace	3.7	\$1,350	\$4,995	review and analysis of Defendants' motion for summary judgment; Plaintiffs' opposition brief; Defendants' reply brief; preparation of responsive points re same for hearing	Motion for Summary Judgment / Adjudication

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/14/2024	Guy Wallace	0.8	\$1,350	\$1,080	com's with GG; MTJ re Defendants' reply brief re MSJ; preparation of settlement conference with MJ Spero	Appeal
10/14/2024	Mark Johnson	0.4	\$1,150	\$460	calls w/ GBW re MSJ arguments, opposition to mtn in limine re Kennedy, settlement conference.	Case Organization, Planning and Strategy
10/14/2024	Mark Johnson	1.4	\$1,150	\$1,610	review and analyze D's reply iso their motion for summary judgment.	Motion for Summary Judgment / Adjudicaiton
10/14/2024	Mark Johnson	0.2	\$1,150	\$230	coms w/ S Stiner re settlement conference participation.	Settlement
10/14/2024	Mark Johnson	1.0	\$1,150	\$1,150	Video conference w / client S Stiner and LEC to practice set up and troubleshoot zoom connection for zoom settlement conference.	Settlement
10/14/2024	Rachel Steyer	2.2	\$750	\$1,650	attempted class outreach, leaving VMs, updating and reviewing notes in spreadsheet	Class Outreach and Contact
10/14/2024	Rachel Steyer	0.3	\$750	\$225	spoke w/family member of resident(s), discussed case and follow up with family member re FSP	Class Outreach and Contact
10/15/2024	Guy Wallace	4.4	\$1,350	\$5,940	prepare for and participate in settlement conference with MJ Spero	Settlement
10/15/2024	Guy Wallace	0.7	\$1,350	\$945	analysis of results of settlement conference; com's with Waters; GG; MTJ re same	Settlement
10/15/2024	Mark Johnson	4.0	\$1,150	\$4,600	Settlement conference w/ Judge Spero, Gay, Guy and clients	Settlement
10/15/2024	Mark Johnson	1.0	\$1,150	\$1,150	prep for settlement conference - review of statements, notes, and testing for zoom functionality.	Settlement
10/15/2024	Mark Johnson	0.1	\$1,150	\$115	follow up call w/ GBW re settlement conference	Settlement
10/15/2024	Rachel Steyer	2.9	\$750	\$2,175	attempted class outreach, leaving VMs, updating and reviewing notes in spreadsheet	Class Outreach and Contact
10/15/2024	Rachel Steyer	0.2	\$750	\$150	call with declarant, provided case status update	Class Outreach and Contact
10/15/2024	Rachel Steyer	2.0	\$750	\$1,500	further review of and work on updating supplemental preliminary disclosures	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/16/2024	Guy Wallace	1.5	\$1,350	\$2,025	legal research and analysis re Defendants' arguments re damages; com's with MTJ re same	Misc. Research
10/16/2024	Guy Wallace	1.6	\$1,350	\$2,160	revise and edit draft reply brief re Daubert motion re Allen; com's with BU re same	Other Motions
10/16/2024	Rachel Steyer	0.2	\$750	\$150	spoke w/nephew of former resident re FSP issues	Class Outreach and Contact
10/16/2024	Rachel Steyer	0.2	\$750	\$150	call with fiduciary representative of residents, confirmed no FSP issues	Class Outreach and Contact
10/16/2024	Rachel Steyer	2.0	\$750	\$1,500	attempted class outreach, leaving VMs, updating and reviewing notes in spreadsheet	Communications With Opposing Counsel
10/16/2024	Rachel Steyer	0.4	\$750	\$300	reviewing and updating supplementnal preliminary disclosures	Discovery (Non-Deposition)
10/16/2024	Rachel Steyer	0.2	\$750	\$150	reviewing draft brief re objections to reply evidence	Other Motions
10/16/2024	Rachel Steyer	0.2	\$750	\$150	reviewing revised draft of objections to reply evidence	Other Motions
10/16/2024	Rachel Steyer	1.7	\$750	\$1,275	researching into Unruh Act statutory damages amount per visit	Other Motions
10/17/2024	Guy Wallace	2.7	\$1,350	\$3,645	legal research and analysis re Defendants' argument re limiting Unruh Act damages; exclusions of PK based on lack of useful knowledge for trier of fact	Misc. Research
10/17/2024	Guy Wallace	0.7	\$1,350	\$945	review and analysis of revised version of reply brief re motion to exclude access-related opinions of Allen; com's with BU re same	Other Motions
10/17/2024	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re Unruh Act damages calculation issue	Other Motions
10/17/2024	Mark Johnson	0.4	\$1,150	\$460	review case law from GBW re calculation of UCRA statutory damages.	Other Motions
10/17/2024	Mark Johnson	0.2	\$1,150	\$230	emails w/ GBW, RLS, JAU re calculation of statutory damages under UCRA.	Other Motions
10/17/2024	Mark Johnson	0.7	\$1,150	\$805	review D reply iso mtn to exclude expert opinions, com w/ GBW re same	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/17/2024	Mark Johnson	0.5	\$1,150	\$575	review and offer edits to draft reply iso mtn to exclude Josh Allen opinions.	Other Motions
10/17/2024	Mark Johnson	0.4	\$1,150	\$460	calls x2 w/ GBW re trial prep issues and submission deadlines, depo exhibit list, demonstratives	Trial and Pretrial Preparation
10/17/2024	Mark Johnson	0.2	\$1,150	\$230	review agenda from JY for team call re trial prep, email re additions to same.	Trial and Pretrial Preparation
10/17/2024	Mark Johnson	0.4	\$1,150	\$460	review depo exhibit list and depo folders, coms w/ LEC, RLS and GBW re same; review updated exhibit list.	Trial and Pretrial Preparation
10/17/2024	Rachel Steyer	5.0	\$750	\$3,750	further research into question about Unruh Act damages- -per occurrence and whether statutory damages applies to multiple barriers	Misc. Research
10/17/2024	Rachel Steyer	1.0	\$750	\$750	attempting to locate record/exhibit of ADAAG statute text	Misc. Research
10/17/2024	Rachel Steyer	0.4	\$750	\$300	reviewing draft motion to exclude Allen opinion	Other Motions
10/17/2024	Rachel Steyer	0.5	\$750	\$375	reviewing defendants reply re motion to exclude expert opinions	Other Motions
10/18/2024	Guy Wallace	2.6	\$1,350	\$3,510	legal research and analysis re Defendants' argument that PK should be excluded because his analysis is simple arithmetic	Other Motions
10/18/2024	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of prior briefing re Defendants' similar Daubert motion re Dr. Kennedy at the class certification stage; District Court ruling re same	Other Motions
10/18/2024	Guy Wallace	1.5	\$1,350	\$2,025	review and analysis of Defendants' Daubert motion re Dr. Kennedy	Other Motions
10/18/2024	Guy Wallace	0.8	\$1,350	\$1,080	com's with JAU re preparation of opposition to Daubert motion re Dr. Kennedy	Other Motions
10/18/2024	Guy Wallace	2.3	\$1,350	\$3,105	preparation and drafting of detailed outline of opposition to Defendants' motion to exclude Dr. Kennedy	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/18/2024	Guy Wallace	1.5	\$1,350	\$2,025	com's with JY; BBK; BM; KS; BU; MTJ; RLS re preparation for focus group; exchange of exhibits; demonstratives; MILs; request for CMC with J. Gilliam to clarify issues covered by Phase One trial	Trial and Pretrial Preparation
10/18/2024	Guy Wallace	0.7	\$1,350	\$945	analysis of potential MILs and subject matters they would address; com's with BU re same	Trial and Pretrial Preparation
10/18/2024	Guy Wallace	0.6	\$1,350	\$810	legal research and analysis re day in the life videos and use as demonstratives	Trial and Pretrial Preparation
10/18/2024	Jennifer Bybee	3.7	\$925	\$3,423	Research re multiple occasions and recovery of damages under Unruh Act	Other Motions
10/18/2024	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re opposition to motion to exclude Kennedy	Other Motions
10/18/2024	Mark Johnson	1.7	\$1,150	\$1,955	team zoom mtg w/ Wallace, Yelin, Bien Kahn, Edmundson, Munoz, Umpierre re trial prep, allocation of work.	Trial and Pretrial Preparation
10/18/2024	Rachel Steyer	1.7	\$750	\$1,275	weekly meeting with RBGG, BSU, GBW, MTJ re ongoing tasks, assignments, trial prep	Case Organization, Planning and Strategy
10/18/2024	Rachel Steyer	5.4	\$750	\$4,050	further research into Unruh Act damages provisions re occasion and barriers	Misc. Research
10/18/2024	Rachel Steyer	0.2	\$750	\$150	email to JUB, GBW, MTJ re research findings re Unruh Act damages question	Misc. Research
10/19/2024	Guy Wallace	4.1	\$1,350	\$5,535	preparation and drafting of opposition to Defendants' motion to exclude Dr. Kennedy	Other Motions
10/19/2024	Guy Wallace	2.6	\$1,350	\$3,510	preparation and drafting of opposition brief re Defendants' motion to exclude Dr. Kennedy; argument re methodology and proper interpretation of Civil Code section 55.56	Other Motions
10/19/2024	Jennifer Bybee	0.4	\$925	\$370	Research simple math doesn't include where expert relies on voluminous data	Experts (Including Retention)
10/19/2024	Jennifer Bybee	0.4	\$925	\$370	Review D's Motion in Limine re Kennedy	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/19/2024	Jennifer Bybee	4.3	\$925	\$3,978	Draft Opp. to Motion to exclude Dr. Kennedy	Other Motions
10/19/2024	Mark Johnson	0.4	\$1,150	\$460	Draft email to OC re proposed CMC re trial issues; coms w/ COC re same	Trial and Pretrial Preparation
10/20/2024	Guy Wallace	4.1	\$1,350	\$5,535	preparation and drafting of opposition to Defendants' motion to exclude Dr. Kennedy	Other Motions
10/21/2024	Guy Wallace	2.2	\$1,350	\$2,970	preparation and drafting of opposition to Defendants' motion to exclude Dr. Kennedy	Other Motions
10/21/2024	Guy Wallace	1.2	\$1,350	\$1,620	review and analysis of draft of opposition to Defendants' motion to exclude Dr. Kennedy; com's with JAU re same (.4)	Other Motions
10/21/2024	Jennifer Bybee	0.9	\$925	\$833	Finalize draft of Opp. to Mtn. to Exclude	Other Motions
10/21/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re draft of Opp to Mtn to Exclude	Other Motions
10/21/2024	Jennifer Bybee	0.8	\$925	\$740	Review P. Kennedy depo transcript to locate cite for brief	Other Motions
10/21/2024	Mark Johnson	2.0	\$1,150	\$2,300	Review and modify spreadsheet template for exhibit list, begin review of documents as potential exhibits and enter into list with descriptions and other relevant information	Trial and Pretrial Preparation
10/21/2024	Rachel Steyer	4.5	\$750	\$3,375	ongoing research into damages issues re barriers and occasions under Unruh Act	Misc. Research
10/21/2024	Rachel Steyer	0.2	\$750	\$150	attempted class witness outreach to declarants to provide updates re trial and testimony, leaving VMs, updating notes in spreadsheet	Trial and Pretrial Preparation
10/21/2024	Rachel Steyer	0.3	\$750	\$225	call with declarant Debbie Stinson, case status update, discussed trial prep and testifying	Trial and Pretrial Preparation
10/21/2024	Rachel Steyer	0.9	\$750	\$675	call with Julie Von Waldegg to provide case status update and discuss upcoming trial, possibility of testifying	Trial and Pretrial Preparation
10/21/2024	Rachel Steyer	0.2	\$750	\$150	preparing email to Julie Von Waldegg w/updated case letter and re-sending declaration for review	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/21/2024	Rachel Steyer	0.3	\$750	\$225	call with Clarence Alvey, provided case update, discussed upcoming trial, possibility of testifying	Trial and Pretrial Preparation
10/21/2024	Travis Close	0.2	\$850	\$170	Email to co-counsel re: invoice for deposition transcript of douglas cross	Case Organization, Planning and Strategy
10/21/2024	Travis Close	1.4	\$850	\$1,190	Legal research & fact-checking defendants' new cases cited in reply iso motion to exclude kailes, cross, mastin, waters, barchuk testimony	Case Organization, Planning and Strategy
10/21/2024	Travis Close	0.5	\$850	\$425	Review and analyze plaintiffs' reply iso motion to exclude Josh Allen testimony (Daubert)	Case Organization, Planning and Strategy
10/21/2024	Travis Close	1.3	\$850	\$1,105	Review, organize, and propose exhibits for trial - Emergency Evacuation	Case Organization, Planning and Strategy
10/21/2024	Travis Close	1.2	\$850	\$1,020	Review, organize, and propose exhibits for trial - Transportation	Case Organization, Planning and Strategy
10/21/2024	Travis Close	0.5	\$850	\$425	Review and analyze def's reply iso motion to exclude testimony of kailes/cross/mastin/waters/barchuk	Other Motions
10/21/2024	Travis Close	1.1	\$850	\$935	Review and analyze notes from 10-18-21 team meeting re: trial prep strategy	Trial and Pretrial Preparation
10/21/2024	Travis Close	1.7	\$850	\$1,445	Legal research on use of demonstratives vs. other types of evidence at trial, and how to use demonstratives effectively	Trial and Pretrial Preparation
10/22/2024	Guy Wallace	2.1	\$1,350	\$2,835	revise and edit initial draft of opposition to Defendants' motion to exclude Dr. Kennedy	Other Motions
10/22/2024	Guy Wallace	1.2	\$1,350	\$1,620	legal research and analysis re legislative history of Section 55.56; language of subsection (i)	Other Motions
10/22/2024	Guy Wallace	1.8	\$1,350	\$2,430	revise and edit draft opposition to Defendants' motion to exclude Dr. Kennedy; com's with JRA; Waters; MTJ; RLS re same (.9) re damages methodology and Civil Code section 55.56	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/22/2024	Guy Wallace	1.1	\$1,350	\$1,485	revise and edit draft opposition to motion to exclude Dr. Kennedy; review and analysis of redlines from JY; JAU	Other Motions
10/22/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re brief in opp to mtn. to preclude Dr. Kennedy	Other Motions
10/22/2024	Jennifer Bybee	2.1	\$925	\$1,943	Perform legal cite check and create redline edit of Opp. to Mtn. to Exclude Dr. Kennedy	Other Motions
10/22/2024	Mark Johnson	0.8	\$1,150	\$920	draft proposed request for status conference, com w/ LEC re same	Case Management Conferences
10/22/2024	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW re opposition to mtn exclude Kennedy opinions, trial exhibit (shawn cull demand letter)	Case Organization, Planning and Strategy
10/22/2024	Mark Johnson	0.5	\$1,150	\$575	finalize draft outline / agenda for Rule 26(f) conference	Case Organization, Planning and Strategy
10/22/2024	Mark Johnson	1.0	\$1,150	\$1,150	review and comment on draft opposition to mtn to exclude Kennedy opinions.	Other Motions
10/22/2024	Mark Johnson	0.1	\$1,150	\$115	email exchanges w/ J Yellin, E Rutner re mtn numbers of mtns in limine and requesting status conference	Other Motions
10/22/2024	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW re motion to exclude expert opinions. argument on same	Other Motions
10/22/2024	Mark Johnson	0.1	\$1,150	\$115	draft email to RAB, RLS re demand letter to Shawn Cull, source, other copies, etc.	Trial and Pretrial Preparation
10/22/2024	Mark Johnson	1.5	\$1,150	\$1,725	continued review of docs for identification of trial exhibits, including construction history docs.	Trial and Pretrial Preparation
10/22/2024	Rachel Steyer	1.5	\$750	\$1,125	attempted class outreach, leaving VMs, updating and reviewing notes in spreadsheet	Class Outreach and Contact
10/22/2024	Rachel Steyer	0.5	\$750	\$375	providing cases to GBW re Unruh Act damages awards	Misc. Research
10/22/2024	Rachel Steyer	0.8	\$750	\$600	reviewing and proofreading opposition to daubert motion to exclude Dr. Kennedy	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/22/2024	Rachel Steyer	0.3	\$750	\$225	call with GBW to review and discuss research vis a vis Unruh Act damages for opposition motion, supplemental disclosures	Other Motions
10/22/2024	Rachel Steyer	0.2	\$750	\$150	attempting to follow up with plaintiff declarants re trial, leaving VMs, updating notes in spreadsheet	Trial and Pretrial Preparation
10/22/2024	Rachel Steyer	0.3	\$750	\$225	call with declarant Christopher Gail re upcoming trial and potential testimony	Trial and Pretrial Preparation
10/22/2024	Rachel Steyer	0.2	\$750	\$150	call with declarant James Marshman re upcoming trial dates and possibility of testifying	Trial and Pretrial Preparation
10/22/2024	Travis Close	1.4	\$850	\$1,190	Draft proposed MIL topics re: Anderson testimony, observations, and photographs	Case Organization, Planning and Strategy
10/22/2024	Travis Close	1.8	\$850	\$1,530	Legal research on motions in limine - applicability, standard of review, types	Case Organization, Planning and Strategy
10/22/2024	Travis Close	2.2	\$850	\$1,870	Legal research on Judge Gilliam's opinions and reasoning on motions in limine rulings	Case Organization, Planning and Strategy
10/22/2024	Travis Close	0.2	\$850	\$170	Email to team re: additional MIL suggestions implicating def's expert Anderson	Case Organization, Planning and Strategy
10/22/2024	Travis Close	1.3	\$850	\$1,105	Begin outlining motion in limine re: Defendants' use of literature articles discussing safety hazards of wheelchair securement	Case Organization, Planning and Strategy
10/22/2024	Travis Close	0.6	\$850	\$510	Review and analyze draft motion to exclude testimony of Dr Kennedy	Other Motions
10/22/2024	Travis Close	0.2	\$850	\$170	Review and analyze draft joint request for status conference	Trial and Pretrial Preparation
10/23/2024	Guy Wallace	0.9	\$1,350	\$1,215	revise and edit draft opposition to motion to exclude Dr. Kennedy	Other Motions
10/23/2024	Guy Wallace	0.9	\$1,350	\$1,215	revise and edit final draft of opposition to motion to exclude Dr. Kennedy	Other Motions
10/23/2024	Jennifer Bybee	0.7	\$925	\$648	Draft and assemble exhibits for Wallace decl	Other Motions
10/23/2024	Jennifer Bybee	0.9	\$925	\$833	Proofread Opp to Mtn to Exclude Dr. Kennedy	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/23/2024	Rachel Steyer	1.9	\$750	\$1,425	attempted class outreach, leaving VMs, updating and reviewing notes in spreadsheet	Class Outreach and Contact
10/23/2024	Rachel Steyer	2.7	\$750	\$2,025	further work on updating draft supplemental preliminary disclosures	Discovery (Non-Deposition)
10/23/2024	Rachel Steyer	0.2	\$750	\$150	reviewing defendants objection to motion to strike	Other Motions
10/23/2024	Travis Close	1.4	\$850	\$1,190	Legal research on mootness of Unruh Act Claims after dismissal of ADA claims for mootness	Case Organization, Planning and Strategy
10/23/2024	Travis Close	2.2	\$850	\$1,870	Research motions in limine rulings in cases brought under ADA & Unruh Act	Case Organization, Planning and Strategy
10/23/2024	Travis Close	1.6	\$850	\$1,360	Legal research regarding whether whether assistance with barriers is permitted testimony in ADA physical access cases	Case Organization, Planning and Strategy
10/23/2024	Travis Close	1.1	\$850	\$935	Legal research on deliberate indifference to show intentional discrimination under Unruh Act (possible MIL)	Case Organization, Planning and Strategy
10/24/2024	Rachel Steyer	1.8	\$750	\$1,350	attempted class outreach, leaving VMs, updating and reviewing notes in spreadsheet	Class Outreach and Contact
10/24/2024	Travis Close	1.4	\$850	\$1,190	Legal research on cases in ninth circuit addressing motions in limine for ADA/Unruh Act cases	Case Organization, Planning and Strategy
10/24/2024	Travis Close	2.2	\$850	\$1,870	Trial prep - analysis of discovery requested in RFPs, ROGs, RFAs re: transportation and what needs to be supplemented	Case Organization, Planning and Strategy
10/24/2024	Travis Close	1.9	\$850	\$1,615	Trial prep - analysis of discovery requested in cases re: emergency evacuation and what needs to be supplemented	Trial and Pretrial Preparation
10/25/2024	Guy Wallace	1.5	\$1,350	\$2,025	com's with JY; BM; AS; KS; BU; MTJ; JAU; TCC; RLS re preparation of demonstratives; issues re bifurcation; motions in limine; potential use of testimony by zoom at trial	Trial and Pretrial Preparation
10/25/2024	Jennifer Bybee	1.7	\$925	\$1,573	Zoom call with co-counsel re trial preparation	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/25/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re zoom call and trial preparation	Trial and Pretrial Preparation
10/25/2024	Mark Johnson	1.6	\$1,150	\$1,840	team zoom video conference re trial prep, subjects and strategy for 10/31 report and 11/12 conference .	Trial and Pretrial Preparation
10/25/2024	Rachel Steyer	1.6	\$750	\$1,200	weekly zoom with RBGG, BSU, MTJ, TCC, GBW, JUB to review and discuss ongoing tasks and assignments	Case Organization, Planning and Strategy
10/25/2024	Rachel Steyer	1.3	\$750	\$975	attempted class outreach, leaving VMs, updating and reviewing notes in spreadsheet	Class Outreach and Contact
10/25/2024	Rachel Steyer	0.3	\$750	\$225	call with son of former residents, discussed case, agreed to follow up next week	Class Outreach and Contact
10/25/2024	Rachel Steyer	0.3	\$750	\$225	call with Cory Sheek re case status update and possibility of testifying	Class Outreach and Contact
10/25/2024	Rachel Steyer	0.3	\$750	\$225	attempted follow up calls with plaintiff declarants re upcoming trial and case status update, leaving VMs	Trial and Pretrial Preparation
10/25/2024	Rachel Steyer	0.4	\$750	\$300	call with declarant Lee Arsenian re case status update and potential trial testimony	Trial and Pretrial Preparation
10/25/2024	Rachel Steyer	0.4	\$750	\$300	call with declarant Carolyn Bowen re case status update and possibility of testifying	Trial and Pretrial Preparation
10/25/2024	Travis Close	1.5	\$850	\$1,275	Motions in limine - Legal research on whether expert testimony interpreting whether entities are covered under ADA regs is proper	Case Organization, Planning and Strategy
10/25/2024	Travis Close	0.0	\$850	\$0	Team meeting with GBW, MTJ, JUB, RLS, and co-counsel re: trial prep strategy, MILs, demonstratives, etc.	Case Organization, Planning and Strategy
10/25/2024	Travis Close	0.8	\$850	\$680	Analyze def's motion for summary judgment and opposition to plaintiffs' MSJ for additional topics to be subject to MILs	Other Motions
10/25/2024	Travis Close	1.4	\$850	\$1,190	Demonstratives - research tools for simple graphic animation to visualize barriers	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/28/2024	Guy Wallace	1.0	\$1,350	\$1,350	analysis of issues for November CMC with J. Gilliam; com's with MTJ re same (.4)	Case Management Conferences
10/28/2024	Jennifer Bybee	0.1	\$925	\$93	Review emails between co-counsel re trial preparation	Other Motions
10/28/2024	Mark Johnson	0.2	\$1,150	\$230	Review email and memo from COC re Jestrabek-Hart and day-in-the-life video	Trial and Pretrial Preparation
10/28/2024	Rachel Steyer	3.3	\$750	\$2,475	attempted class outreach, leaving VMs, updating and reviewing notes in spreadsheet	Class Outreach and Contact
10/28/2024	Rachel Steyer	0.2	\$750	\$150	reviewing memo from AS re call with BJH and access barriers	Trial and Pretrial Preparation
10/28/2024	Travis Close	0.8	\$850	\$680	Email to DJC (expert) re: case update, update on pre-trial & trial schedule, and expected timing of FSP class testimony	Case Organization, Planning and Strategy
10/28/2024	Travis Close	0.9	\$850	\$765	Email to JIK (expert) re: case update, update on pre-trial & trial schedule, and expected timing of emergency evacuation testimony	Experts (Including Retention)
10/29/2024	Guy Wallace	0.6	\$1,350	\$810	com's with Rutner; Bertino; Jacobsen; Gravante; JY; BBK; MTJ re issues to be addressed at November CMC	Case Management Conferences
10/29/2024	Guy Wallace	1.0	\$1,350	\$1,350	zoom with GG; JY; BBK; AS; BM; KS; BU; MTJ; JAU; TCC re November 2024 CMC and preparation for meet and confer with Defendants re same	Trial and Pretrial Preparation
10/29/2024	Jennifer Bybee	0.8	\$925	\$740	Zoom call with co-counsel re trial preparation	Other Motions
10/29/2024	Mark Johnson	1.1	\$1,150	\$1,265	team mtg with Yelin, Bien-Kahn, Gay, Jen B, Close, Munoz, Stilber, Edmundson, Wallace, re trial prep, meeting and conferring re scope of first trial.	Trial and Pretrial Preparation
10/29/2024	Mark Johnson	0.7	\$1,150	\$805	video conference w/ OC re issues for 10/31 submission and 11/12 CMC	Trial and Pretrial Preparation
10/29/2024	Rachel Steyer	1.0	\$750	\$750	meeting with RBGG, BSU, GBW, MTJ, TCC, JUB re pretrial assignments and items to discuss before meet and confer with defendants	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/29/2024	Rachel Steyer	0.6	\$750	\$450	attempted class outreach (FSP list), leaving VMs, updating and reviewing notes in spreadsheet	Class Outreach and Contact
10/29/2024	Rachel Steyer	2.1	\$750	\$1,575	attempted ADA class outreach, leaving VMs, updating and reviewing notes in spreadsheet	Class Outreach and Contact
10/29/2024	Rachel Steyer	0.3	\$750	\$225	follow up call with Wendy DeMello to provide case status update	Trial and Pretrial Preparation
10/29/2024	Travis Close	0.2	\$850	\$170	Review and analyze memo from co-counsel re: update on Bernie's unit and pre-trial documentaries	Case Organization, Planning and Strategy
10/29/2024	Travis Close	1.2	\$850	\$1,020	Meeting with GBW, MTJ, RLS, and co-counsel re: trial and pre-trial preparation, demonstratives, witness preparation, class member testimony	Case Organization, Planning and Strategy
10/29/2024	Travis Close	0.7	\$850	\$595	Meet and confer with co-counsel re: scope of first trial vs. trailing claims, # of MILs, depo transcripts. evidence under seal	Case Organization, Planning and Strategy
10/29/2024	Travis Close	2.4	\$850	\$2,040	Proof chart -- additions to evidence citations for elements for claim of ADA - emergency evacuation by plaintiff Jestrabek-Hart	Trial and Pretrial Preparation
10/29/2024	Travis Close	0.9	\$850	\$765	Proof chart -- additions to evidence citations for elements for claim of ADA - emergency evacuation by plaintiff Stiner	Trial and Pretrial Preparation
10/30/2024	Guy Wallace	1.6	\$1,350	\$2,160	com's with GG; JY; BBK; MTJ re draft CMC statement, issue of trial structure	Case Management Conferences
10/30/2024	Mark Johnson	0.8	\$1,150	\$920	review and edit draft opposition to mtn to strike objections to improper reply evidence; draft email to COC B Munoz and others with explanations.	Other Motions
10/30/2024	Mark Johnson	1.2	\$1,150	\$1,380	zoom mtg w/ COC re trial prep, scope of first trial and position to be taken in joint statement to the court (.7); zoom continued with G Grunfeld re day in the life video with S Stiner, strategy and arrangements for same (.5), also issues re Ralph Schmidt.	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/30/2024	Mark Johnson	1.8	\$1,150	\$2,070	finalize and circulate memo to file re former employee and potential witnesses identified	Trial and Pretrial Preparation
10/30/2024	Mark Johnson	0.4	\$1,150	\$460	call w GBW re scope of first trial and position for joint statement to court for 11/12 status conference.	Trial and Pretrial Preparation
10/30/2024	Mark Johnson	0.3	\$1,150	\$345	further call w/ GBW re position re scope of first trial, issues related to Plaintiff Schmidt and damages claims	Trial and Pretrial Preparation
10/30/2024	Mark Johnson	0.3	\$1,150	\$345	draft emails to RLS re potential trial witnesses.	Trial and Pretrial Preparation
10/30/2024	Travis Close	1.4	\$850	\$1,190	Legal research on admissibility of demonstrative evidence in federal court - ninth circuit	Case Organization, Planning and Strategy
10/30/2024	Travis Close	1.6	\$850	\$1,360	Legal research of secondary sources on admissibility of demonstrative evidence	Trial and Pretrial Preparation
10/30/2024	Travis Close	1.7	\$850	\$1,445	Legal research on admissibility of animation as demonstrative evidence - ninth circuit	Trial and Pretrial Preparation
10/30/2024	Travis Close	1.3	\$850	\$1,105	Legal research on admissibility of animation as demonstrative evidence - outside ninth circuit	Trial and Pretrial Preparation
10/30/2024	Travis Close	0.6	\$850	\$510	Research types of hearsay objections to demonstrative evidence	Trial and Pretrial Preparation
10/31/2024	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re preparation of video of Stacy Stiner and barriers at San Ramon	Trial and Pretrial Preparation
10/31/2024	Mark Johnson	0.3	\$1,150	\$345	review OC edits to joint statement re scope of trial for 11/12 hearing, email coms re same, review revised draft and JY email	Trial and Pretrial Preparation
10/31/2024	Mark Johnson	0.1	\$1,150	\$115	com w/ graphics consultant re meeting re demonstratives	Trial and Pretrial Preparation
10/31/2024	Mark Johnson	0.3	\$1,150	\$345	pull and share photos of S Stiner for demonstratives at trial.	Trial and Pretrial Preparation
10/31/2024	Mark Johnson	0.6	\$1,150	\$690	Review and respond to A Spiegel re Stiner barrier chart and prep for video session; review depo transcript to identify S Stiner's description of barriers and compile list and send to COC	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
10/31/2024	Mark Johnson	1.0	\$1,150	\$1,150	prepare list of potential demonstratives, draft email to COC re same	Trial and Pretrial Preparation
10/31/2024	Mark Johnson	2.0	\$1,150	\$2,300	prepare chart of barrier evidence and testimony for Stacy Stiner, review complaint, rogs responses, depo testimony and barrier reports for same; email to COC re same	Trial and Pretrial Preparation
10/31/2024	Mark Johnson	0.1	\$1,150	\$115	review email from RLS re non-inspection of Schmidt's Tracy unit and potential witnesses identified by former employee M. Jain	Trial and Pretrial Preparation
10/31/2024	Rachel Steyer	0.5	\$750	\$375	response to MTJ re witnesses and inspection question	Trial and Pretrial Preparation
10/31/2024	Travis Close	1.1	\$850	\$935	Analysis of depo testimony from employees at San Ramon re: emergency evacuation policies and capacity to transport mobility devices	Case Organization, Planning and Strategy
10/31/2024	Travis Close	0.6	\$850	\$510	Additions/revisions to list of potential deomonstratives	Case Organization, Planning and Strategy
10/31/2024	Travis Close	1.3	\$850	\$1,105	additions/revisions to case proof chart (physical access claims)	Case Organization, Planning and Strategy
10/31/2024	Travis Close	0.3	\$850	\$255	Review and analyze draft joint response to court re: various pre-trial issues	Trial and Pretrial Preparation
10/31/2024	Travis Close	0.8	\$850	\$680	Analyze depo testimony by Stacia Stiner re: mobility devices used, and timeline of same	Trial and Pretrial Preparation
10/31/2024	Travis Close	2.0	\$850	\$1,700	Draft outline of memo for team re: use of demonstrative evidence	Trial and Pretrial Preparation
11/1/2024	Guy Wallace	0.9	\$1,350	\$1,215	com's with Goodwin; GG re settlement and requests for monetary demands	Settlement
11/1/2024	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re demonstratives; trial team site	Trial and Pretrial Preparation
11/1/2024	Guy Wallace	0.8	\$1,350	\$1,080	team zoom with GG; JY; BBK; AS; BM; KS; BU; MTJ; JAU; TCC re demonstratives; video re Stacy Stiner; exhibit list; trial preparation	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/1/2024	Jennifer Bybee	0.1	\$925	\$93	Review emails between co-counsel re trial preparation	Other Motions
11/1/2024	Jennifer Bybee	0.9	\$925	\$833	Zoom call with co-counsel re trial preparation	Trial and Pretrial Preparation
11/1/2024	Travis Close	1.5	\$850	\$1,275	Legal research on knowledge required by conservator to testify on behalf of incompetent person	Case Organization, Planning and Strategy
11/1/2024	Travis Close	1.4	\$850	\$1,190	Legal research on rights of person who is in conservatorship to testify on behalf of someone else	Case Organization, Planning and Strategy
11/1/2024	Travis Close	0.9	\$850	\$765	Meeting with GBW, MTJ, and co-counsel re: issues with evidence at Tracy facility; updates on demonstratives; exhibit list	Case Organization, Planning and Strategy
11/1/2024	Travis Close	2.3	\$850	\$1,955	Continue drafting memo on demonstrative evidence	Trial and Pretrial Preparation
11/2/2024	Guy Wallace	0.9	\$1,350	\$1,215	analysis of implications of Goodwin's request for monetary demand re named Plaintiffs and fees and costs, and potential conflicts raised re same and potential for abuse by Defendants	Settlement
11/4/2024	Mark Johnson	1.2	\$1,150	\$1,380	internal conference call w/ J. Kim, P Pearlman, A Lee re strategy around 26f conference report, ESI stipulation and protective order.	Case Organization, Planning and Strategy
11/4/2024	Rachel Steyer	3.2	\$750	\$2,400	attempted ADA barrier outreach, left VMs, updated and reviewed notes in spreadsheet	Class Outreach and Contact
11/4/2024	Rachel Steyer	0.2	\$750	\$150	received call back from daughter of former Tracy resident, discussed case, scheduled follow up call	Class Outreach and Contact
11/4/2024	Rachel Steyer	0.2	\$750	\$150	follow up call with wife of former Oceanside resident, discussed case, set up call to further discuss FSP	Class Outreach and Contact
11/4/2024	Rachel Steyer	0.5	\$750	\$375	call with daughter in law of current Tracy resident, discussed update to case, scheduled follow up call	Class Outreach and Contact
11/4/2024	Rachel Steyer	0.3	\$750	\$225	reviewing RBGG memos re Ralph Schmidt	Misc. Research
11/4/2024	Rachel Steyer	0.3	\$750	\$225	reviewing defendants reply re MIL to exclude Dr. Kennedy testimony	Other Motions
11/4/2024	Rachel Steyer	0.2	\$750	\$150	reviewing MTJ memo re call with terminated Brookdale San Ramon employee	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/4/2024	Rachel Steyer	0.2	\$750	\$150	reviewing parties' joint status report re trial issues	Trial and Pretrial Preparation
11/4/2024	Travis Close	1.5	\$850	\$1,275	Legal research on standards for evaluating risk of prejudice under FRE 403 in admissible evidence	Case Organization, Planning and Strategy
11/4/2024	Travis Close	1.4	\$850	\$1,190	Continue drafting memo on demonstrative evidence (in-court demonstrations)	Trial and Pretrial Preparation
11/4/2024	Travis Close	1.5	\$850	\$1,275	Legal research on propriety of using animations as demonstrative evidence	Trial and Pretrial Preparation
11/4/2024	Travis Close	1.4	\$850	\$1,190	Legal research on propriety of using in-court demonstrations as demonstrative evidence	Trial and Pretrial Preparation
11/5/2024	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW re settlement term sheet, communication with OC	Settlement
11/5/2024	Mark Johnson	1.2	\$1,150	\$1,380	review and upload potential exhibits.	Trial and Pretrial Preparation
11/5/2024	Rachel Steyer	3.1	\$750	\$2,325	attempted FSP class outreach, leaving VMs, updating and reviewing notes in spreadsheet	Class Outreach and Contact
11/5/2024	Rachel Steyer	0.3	\$750	\$225	call with current resident of San Ramon, discussed case	Class Outreach and Contact
11/5/2024	Rachel Steyer	0.3	\$750	\$225	call with son of former resident, discussed FSP issues, scheduled follow up call	Class Outreach and Contact
11/5/2024	Rachel Steyer	0.3	\$750	\$225	received call back from Wendy DeMello, confirmed accidental call as part of FSP outreach, discussed case	Class Outreach and Contact
11/5/2024	Rachel Steyer	0.2	\$750	\$150	received call back from daughter of former residents, discussed case and follow up	Class Outreach and Contact
11/5/2024	Rachel Steyer	0.8	\$750	\$600	reviewing omnibus motion to seal, order and sponsoring delcaration	Other Motions
11/5/2024	Rachel Steyer	0.3	\$750	\$225	call with Yvonne Buff, discussed upcoming trial and case schedule	Trial and Pretrial Preparation
11/5/2024	Travis Close	1.9	\$850	\$1,615	Continue drafting memo on demonstrative evidence (establishing a foundation)	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/5/2024	Travis Close	1.2	\$850	\$1,020	Legal research on standard for authentication of evidence at trial	Case Organization, Planning and Strategy
11/5/2024	Travis Close	0.8	\$850	\$680	Continue drafting memo on demonstrative evidence (day in the life videos)	Case Organization, Planning and Strategy
11/5/2024	Travis Close	0.7	\$850	\$595	Further legal research re: propriety of day-in-life videos as demonstrative evidence	Case Organization, Planning and Strategy
11/5/2024	Travis Close	0.7	\$850	\$595	Legal research re: new federal rule of evidence 107 on illustrative aids	Case Organization, Planning and Strategy
11/5/2024	Travis Close	1.3	\$850	\$1,105	Legal research on how to lay proper foundation for demonstrative evidence	Trial and Pretrial Preparation
11/5/2024	Travis Close	1.1	\$850	\$935	Continue drafting memo on demonstrative evidence (summary evidence under FRE 1006)	Trial and Pretrial Preparation
11/6/2024	Guy Wallace	5.4	\$1,350	\$7,290	preparation and drafting of deal points re injunctive relief; com's with MTJ; TCC re same (.9)	Settlement
11/6/2024	Guy Wallace	0.6	\$1,350	\$810	review and analysis of draft barriers chart re Stiner; com's with MTJ re same	Trial and Pretrial Preparation
11/6/2024	Mark Johnson	0.3	\$1,150	\$345	call w TCC re drafting section on emergency evacuation for term sheet for injunctive relief; discussion re demonstratives for trial	Case Organization, Planning and Strategy
11/6/2024	Mark Johnson	0.9	\$1,150	\$1,035	Calls w/ GBW (x5) re demonstratives, mtg w/ D Murov, S Stiner access barrier chart and barriers to pursue, Schmidt barriers at Tracy and possible mtn to seek inspection of Rm 238;	Case Organization, Planning and Strategy
11/6/2024	Mark Johnson	0.7	\$1,150	\$805	Review and edit draft term sheet for injunctive relief, com w/ GBW re same.	Settlement
11/6/2024	Mark Johnson	1.5	\$1,150	\$1,725	review 2019 SR barrier survey from G Waters and revise to Stiner room 204 barrier chart.	Trial and Pretrial Preparation
11/6/2024	Mark Johnson	0.6	\$1,150	\$690	Review TCC research memo re demonstratives.	Trial and Pretrial Preparation
11/6/2024	Mark Johnson	0.8	\$1,150	\$920	further revisions to Stiner barrier chart to include references to Ex A to 4AC; email to COC re same.	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/6/2024	Rachel Steyer	1.9	\$750	\$1,425	attempting FSP class outreach, leaving VMs, updating and reviewing notes in spreadsheet	Class Outreach and Contact
11/6/2024	Rachel Steyer	0.2	\$750	\$150	call with daughter of former resident re FSP issues	Class Outreach and Contact
11/6/2024	Rachel Steyer	0.4	\$750	\$300	reviewing RBGG list of ROG citations	Discovery (Non-Deposition)
11/6/2024	Rachel Steyer	0.3	\$750	\$225	reviewing memo from TCC re demonstrative evidence	Misc. Research
11/6/2024	Travis Close	0.8	\$850	\$680	Legal research on standard of appellate review for admission/exclusion of demonstrative evidence	Case Organization, Planning and Strategy
11/6/2024	Travis Close	1.5	\$850	\$1,275	Draft term sheet section (injunctive relief demand) for emergency evacuation	Case Organization, Planning and Strategy
11/6/2024	Travis Close	0.2	\$850	\$170	Review and analyze proposed demand for injunctive relief	Case Organization, Planning and Strategy
11/6/2024	Travis Close	0.4	\$850	\$340	Call with MTJ re: term sheet demand - emergency evacuation - write-up needed	Settlement
11/6/2024	Travis Close	0.6	\$850	\$510	Email to team re: suggestion to designate jeanine monteleone and michael johnson to authenticate emergency manual & bus finders contract	Trial and Pretrial Preparation
11/6/2024	Travis Close	1.8	\$850	\$1,530	Continue drafting memo on demonstrative evidence (section: test for admissibility)	Trial and Pretrial Preparation
11/6/2024	Travis Close	1.3	\$850	\$1,105	Continue drafting memo on demonstrative evidence (section: required notice and rule 26 disclosures)	Trial and Pretrial Preparation
11/6/2024	Travis Close	1.3	\$850	\$1,105	Legal research on admitting demonstrative pieces that are not-to-scale	Trial and Pretrial Preparation
11/6/2024	Travis Close	0.3	\$850	\$255	Review and analyze judge gilliam's civil pretrial and trial standing order	Trial and Pretrial Preparation
11/6/2024	Travis Close	0.9	\$850	\$765	Finish drafting memo re: use of demonstrative evidence at trial	Trial and Pretrial Preparation
11/7/2024	Guy Wallace	1.0	\$1,350	\$1,350	review and analysis of RBGG memo re Unruh Act damages; RBGG draft of potential settlement amounts re named Plaintiffs' claims	Settlement

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/7/2024	Guy Wallace	0.5	\$1,350	\$675	com's with BU re potential settlement demand and amount thereof re Schmidt	Settlement
11/7/2024	Guy Wallace	0.6	\$1,350	\$810	com's with GG re settlement and demands re injunctive relief; potential resolutions of individual damages claims	Settlement
11/7/2024	Guy Wallace	1.0	\$1,350	\$1,350	com's with MTJ re settlement efforts; potential damages demands re named Plaintiffs and RBGG analysis of same	Settlement
11/7/2024	Guy Wallace	0.6	\$1,350	\$810	review and analysis of draft list of potential demonstratives from MTJ	Trial and Pretrial Preparation
11/7/2024	Guy Wallace	1.1	\$1,350	\$1,485	analysis of potential demonstrative and draft list from MTJ re same; com's with MTJ re same (.5)	Trial and Pretrial Preparation
11/7/2024	Guy Wallace	1.2	\$1,350	\$1,620	zoom with Murov; GG; JY; KS; MTJ; TCC re potential demonstratives	Trial and Pretrial Preparation
11/7/2024	Mark Johnson	0.2	\$1,150	\$230	zoom call discussion of proposed term sheet for injunctive relief for settlement purposes.	Settlement
11/7/2024	Mark Johnson	0.2	\$1,150	\$230	Call w/ GBW re settlement discussions w/ OC, insurance coverage, term sheet.	Settlement
11/7/2024	Mark Johnson	0.2	\$1,150	\$230	further coms w/ GBW re settlement issues, allocation of potential damages settlement among plaintiffs.	Settlement
11/7/2024	Mark Johnson	0.5	\$1,150	\$575	call w/ GBW re strategy on proposed demonstratives and list of same	Trial and Pretrial Preparation
11/7/2024	Mark Johnson	0.6	\$1,150	\$690	zoom call w/ D Murov, Gunfeld, Close, Yelin, Wallace, Stilber re planning and review of potential demonstratives.	Trial and Pretrial Preparation
11/7/2024	Mark Johnson	0.6	\$1,150	\$690	zoom call w/ Yelin, Stilber, Close, Wallace re possible inspection of Schmidt unit, production of photos of same from RBGG staff, preparation of exhibits.	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/7/2024	Mark Johnson	0.4	\$1,150	\$460	review photos from Tracy room 238 (Schmidt's room), coms /w J Yelin, B. Munoz, R Bonner and G Waters re transmission and review of same	Trial and Pretrial Preparation
11/7/2024	Mark Johnson	0.3	\$1,150	\$345	review Stiner "day in the life" raw video.	Trial and Pretrial Preparation
11/7/2024	Rachel Steyer	0.2	\$750	\$150	follow up call with family member of Brookhurst facility, discussed issues	Class Outreach and Contact
11/7/2024	Rachel Steyer	1.7	\$750	\$1,275	attempted class outreach, leaving VMs, updating and reviewing notes in spreadsheet	Class Outreach and Contact
11/7/2024	Rachel Steyer	0.2	\$750	\$150	reviewing photograph privilege log designations circulated by RBGG	Discovery (Non-Deposition)
11/7/2024	Rachel Steyer	0.2	\$750	\$150	call with declarant Mary Helm, discussed upcoming trial and testifying	Trial and Pretrial Preparation
11/7/2024	Rachel Steyer	0.3	\$750	\$225	call with Tiffany Boyd re case update, potentially testifying at trial	Trial and Pretrial Preparation
11/7/2024	Rachel Steyer	0.2	\$750	\$150	reviewing common area barrier demonstratives circulated by KS	Trial and Pretrial Preparation
11/7/2024	Rachel Steyer	0.2	\$750	\$150	received call back from Mike McMurry, discussed trial testimony	Trial and Pretrial Preparation
11/7/2024	Travis Close	1.3	\$850	\$1,105	Review and analyze proposed excerpts from ROG, RFA responses for case-in-chief	Case Organization, Planning and Strategy
11/7/2024	Travis Close	1.4	\$850	\$1,190	Legal research on admissibility of interrogatories (impeachment, proof of fact, etc) at trial	Trial and Pretrial Preparation
11/7/2024	Travis Close	1.5	\$850	\$1,275	Additions to trial exhibits spreadsheet re: FSP resident/family complaints	Trial and Pretrial Preparation
11/7/2024	Travis Close	0.8	\$850	\$680	meeting with deborah munov re: trial demonstratives	Trial and Pretrial Preparation
11/7/2024	Travis Close	0.4	\$850	\$340	Review and analyze Devin Mauney photos from Ralph Schmidt's room & privilege log	Trial and Pretrial Preparation
11/8/2024	Guy Wallace	0.5	\$1,350	\$675	revise and edit draft term sheet re injunctive relief; com's with Goodwin; GG re same	Settlement

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/8/2024	Guy Wallace	0.4	\$1,350	\$540	com's with BU re issues re Ralph Schmidt and damages	Settlement
11/8/2024	Guy Wallace	1.7	\$1,350	\$2,295	review and analysis of draft Exhibit A; lists of common barriers re Brookhurst facility; com's with MTJ, RLS re same (.5)	Trial and Pretrial Preparation
11/8/2024	Guy Wallace	0.9	\$1,350	\$1,215	com's with GG; JY; BBK; BM; AS; KAS; BU; MT; JAU; TCC; RLS re preparation for 11/12 CMC; exhibit list; demonstratives; damages	Trial and Pretrial Preparation
11/8/2024	Guy Wallace	0.6	\$1,350	\$810	review and analysis of video of Stiner's room; com's with GG; MTJ re same	Trial and Pretrial Preparation
11/8/2024	Guy Wallace	0.5	\$1,350	\$675	com's with GG; MTJ; RLS re potential video of class member who cannot stand doing a transfer	Trial and Pretrial Preparation
11/8/2024	Guy Wallace	0.4	\$1,350	\$540	com's with PK; LP; JY re revisions to Rule 26(e) report	Trial and Pretrial Preparation
11/8/2024	Jennifer Bybee	0.1	\$925	\$93	Send Mtn to exclude briefing to P. Kennedy and L. Petite	Other Motions
11/8/2024	Jennifer Bybee	1.1	\$925	\$1,018	Zoom call with co-counsel re trial prep	Trial and Pretrial Preparation
11/8/2024	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re settlement prospects and strategy	Settlement
11/8/2024	Mark Johnson	0.5	\$1,150	\$575	Zoom call with Jim Curio and Gay Grunfeld to discuss Stiner day in the life video editing	Trial and Pretrial Preparation
11/8/2024	Mark Johnson	1.2	\$1,150	\$1,380	video conference with videographer Scott C, Gay Grunfeld and (for part of the time) Guy Wallace to view Stiner video clips and discuss edits	Trial and Pretrial Preparation
11/8/2024	Mark Johnson	1.0	\$1,150	\$1,150	litigation team video zoom mtg re trial prep, 11/19 submissions, with Wallace, Grunfeld, Yelin, Bien-Kahn, Stilber, Close, Bybee, Munoz, Edmundson, Umpierre, Steyer.	Trial and Pretrial Preparation
11/8/2024	Mark Johnson	1.8	\$1,150	\$2,070	review Mastin photos from San Ramon 2024 inspections and add to exhibit list with details.	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/8/2024	Mark Johnson	0.9	\$1,150	\$1,035	calls w GBW re trial organization and strategy, common barrier charts, demonstratives,	Trial and Pretrial Preparation
11/8/2024	Mark Johnson	0.1	\$1,150	\$115	review TCC common area chart of frequency of occurrence	Trial and Pretrial Preparation
11/8/2024	Rachel Steyer	1.0	\$750	\$750	weekly zoom meeting with RBGG, GBW, MTJ, TCC, JUB, BSU to review and discuss ongoing tasks and assignments	Case Organization, Planning and Strategy
11/8/2024	Rachel Steyer	0.2	\$750	\$150	call with Miguel Mendoza re case status update, testifying at trial	Trial and Pretrial Preparation
11/8/2024	Travis Close	0.2	\$850	\$170	Email to MTJ, GBW re: draft chart showing common barriers & instances of each	Case Organization, Planning and Strategy
11/8/2024	Travis Close	1.2	\$850	\$1,020	Team meeting with MTJ, GBW, RLS, and co-counsel re: Nov 12 status conference, omnibus sealing motion, pretrial tasks, MILs, etc.	Trial and Pretrial Preparation
11/8/2024	Travis Close	1.8	\$850	\$1,530	Review and analyze barriers in Rule 26 reports of Gary Waters and Jeff Mastin from San Ramon, Scotts Valley, Brookhurst facilities to determine common barriers for demonstrative aids	Trial and Pretrial Preparation
11/8/2024	Travis Close	2.3	\$850	\$1,955	Create chart showing common barriers & instances of each for Scotts Valley, San Ramon, Brookhurst facilities	Trial and Pretrial Preparation
11/8/2024	Travis Close	0.6	\$850	\$510	Legal research on scope of admissibility for bates-numbered documents produced by other side	Trial and Pretrial Preparation
11/8/2024	Travis Close	0.7	\$850	\$595	Analyze visual representations of barrier encounters illustrated in DOJ materials for implementing ADAAG	Trial and Pretrial Preparation
11/10/2024	Guy Wallace	2.2	\$1,350	\$2,970	preparation of revised and updated version of Exhibit A to the Fourth Amended Complaint	Pleadings and Motions Re: Pleadings
11/10/2024	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re Exhibit A to 4AC, strategy for excluding some barriers; strategy for poof at trial	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/10/2024	Mark Johnson	0.1	\$1,150	\$115	email exchange w/ GCG re motions in limine, objections to potential evidence re risk of harm riding in wheelchairs.	Trial and Pretrial Preparation
11/11/2024	Guy Wallace	0.4	\$1,350	\$540	com's with GG re preparation for 11/12 CMC	Case Management Conferences
11/11/2024	Guy Wallace	0.5	\$1,350	\$675	com's with BU re Ralph Schmidt and damages claims	Settlement
11/11/2024	Guy Wallace	0.5	\$1,350	\$675	com's with BU; MTJ re Ralph Schmidt and damages claims	Settlement
11/11/2024	Guy Wallace	1.3	\$1,350	\$1,755	zoom with GG; JY; BU; MTJ re settlement and damages	Settlement
11/11/2024	Guy Wallace	0.9	\$1,350	\$1,215	preparation of demonstrative charts re access barriers in common spaces for San Ramon facility; com's with Waters re same	Trial and Pretrial Preparation
11/11/2024	Jennifer Bybee	0.8	\$925	\$740	Organize Rule 26 report folders on server by date and errata	Experts (Including Retention)
11/11/2024	Jennifer Bybee	0.1	\$925	\$93	Review emails with co-counsel re barrier lists and trial prep	Trial and Pretrial Preparation
11/11/2024	Mark Johnson	0.3	\$1,150	\$345	review GCG 2 page memo for CMC and email comments re same.	Case Organization, Planning and Strategy
11/11/2024	Mark Johnson	0.1	\$1,150	\$115	email to OC Rutner and others re production of insurance policies	Discovery (Non-Deposition)
11/11/2024	Mark Johnson	0.9	\$1,150	\$1,035	rewrite descriptions of motions in limine per GCG recommendations, collapsing several topics	Other Motions
11/11/2024	Mark Johnson	0.1	\$1,150	\$115	email coms w/ GCG, BBK and other COC re motions in limine, objections to evidence.	Other Motions
11/11/2024	Mark Johnson	0.7	\$1,150	\$805	video conference w Umpierre and Wallace re Ralph Schmidt's evidence for Unruh Act Claim, calculation of damages.	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/11/2024	Mark Johnson	1.4	\$1,150	\$1,610	video conference w/ Grunfeld, Wallace, Yelin, Umpierre re damages analysis and allocation of damages, proof issues, CMC strategy of 11/12 and meet and confer w/ OC re trial issues.	Trial and Pretrial Preparation
11/11/2024	Mark Johnson	1.6	\$1,150	\$1,840	continue reviewing potential trial exhibits (expert photos and adding to trial exhibit list)	Trial and Pretrial Preparation
11/11/2024	Mark Johnson	0.4	\$1,150	\$460	calls w/ GBW re settlement issues, evidence for trial to prove willful misconduct for Unruh Act claims.	Trial and Pretrial Preparation
11/12/2024	Guy Wallace	0.6	\$1,350	\$810	com's with GG; JY; MTJ re results of CMC held on 11/12	Case Management Conferences
11/12/2024	Guy Wallace	2.8	\$1,350	\$3,780	revise and edit updated version of Exhibit A to the Fourth Amended Complaint	Pleadings and Motions Re: Pleadings
11/12/2024	Guy Wallace	1.1	\$1,350	\$1,485	preparation of demonstratives re categories of barriers at San Ramon; Scotts Valley; Brookhurst	Trial and Pretrial Preparation
11/12/2024	Mark Johnson	0.5	\$1,150	\$575	Status conference w/ Judge Gilliam re trial and pre-trial issues with Grunfeld and Yellin	Case Management Conferences
11/12/2024	Mark Johnson	0.7	\$1,150	\$805	review and suggest edits to draft Exhibit A to 4AC, list of barriers; coms w/ GBW and RLS re same.	Pleadings and Motions Re: Pleadings
11/12/2024	Mark Johnson	1.0	\$1,150	\$1,150	coms w/ GBW re barriers for 3 individual damages access claims; research and pull documents bearing on same	Pleadings and Motions Re: Pleadings
11/12/2024	Mark Johnson	0.1	\$1,150	\$115	Review and draft response to email from R Bonner re raw access photos from Mastin and Waters.	Trial and Pretrial Preparation
11/12/2024	Mark Johnson	0.5	\$1,150	\$575	complete entry of Brookhurst photos into exhibit lists, draft email to COC team re same and alternative approaches.	Trial and Pretrial Preparation
11/12/2024	Mark Johnson	0.7	\$1,150	\$805	call w/ D Murov re demonstratives, including Grunfeld, Yelin, Bien-Kahn, Close	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/12/2024	Mark Johnson	0.5	\$1,150	\$575	conference w/ G Grunfeld and J Yellin re implications of Judge Gwilliam's ruling on trial and pre-trial issues, strategies for addressing same	Trial and Pretrial Preparation
11/12/2024	Mark Johnson	0.5	\$1,150	\$575	call w/ GBW re status conference and the court's rulings on scope of trial and related issues	Trial and Pretrial Preparation
11/12/2024	Rachel Steyer	0.3	\$750	\$225	searching production for 2017 family council letter from Fountaingrove for GCG	Misc. Research
11/12/2024	Rachel Steyer	0.5	\$750	\$375	searching production photos for photographs of Hemet and Fountaingrove for GCG	Misc. Research
11/12/2024	Rachel Steyer	0.5	\$750	\$375	reviewing draft omnibus motion to seal	Other Motions
11/12/2024	Rachel Steyer	0.2	\$750	\$150	response to GBW re preparing barrier chart exhibit for Hemet, Fountaingrove, Tracy facilities	Trial and Pretrial Preparation
11/12/2024	Rachel Steyer	0.5	\$750	\$375	reviewing and making deletions to Exhibit A barrier spreadsheet	Trial and Pretrial Preparation
11/12/2024	Rachel Steyer	3.4	\$750	\$2,550	further preparation combining tabs in Exhibit A barriers spreadsheet	Trial and Pretrial Preparation
11/12/2024	Travis Close	1.6	\$850	\$1,360	Analysis of floor plans of Hemet & Fountaingrove produced in discovery for use in demonstratives	Case Organization, Planning and Strategy
11/12/2024	Travis Close	0.4	\$850	\$340	Review, analyze, and compile excerpts from relevant statutes & federal regulations related to wheelchair securement issues / FSP for use in demonstrative evidence	Case Organization, Planning and Strategy
11/12/2024	Travis Close	0.4	\$850	\$340	Review and analyze revised Exhibit A (barrier list attachment to complaint) for critical barriers at Brookhurst, San Ramon, Scotts Valley to address at trial	Trial and Pretrial Preparation
11/12/2024	Travis Close	0.7	\$850	\$595	Meeting with sub-group and consultant re: demonstrative evidence at trail	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/12/2024	Travis Close	0.8	\$850	\$680	Analyze evidence from internet archives of photos showing Brookdale's control of the Hemet facility for use in demonstratives	Trial and Pretrial Preparation
11/12/2024	Travis Close	0.8	\$850	\$680	Review and analyze Jeff Mastin's 2019 and 2024 inspections of Hemet for appropriate photos to use as demonstratives	Trial and Pretrial Preparation
11/12/2024	Travis Close	0.9	\$850	\$765	Demonstrative evidence -- analyze proposed list of common area barriers and compare to those found in reports for San Ramon, Scotts Valley, Brookhurst	Trial and Pretrial Preparation
11/12/2024	Travis Close	1.1	\$850	\$935	Compile graphics, charts, diagrams from Douglas Cross & those produced in discovery related to wheelchair securement for FSP-related demonstrative evidence	Trial and Pretrial Preparation
11/12/2024	Travis Close	0.2	\$850	\$170	Email to team re: debrief from today's CMC with Judge Gilliam	Trial and Pretrial Preparation
11/13/2024	Guy Wallace	0.5	\$1,350	\$675	com's with BBK; RLS re preparation of updated Exhibit A to Fourth Amended Complaint	Pleadings and Motions Re: Pleadings
11/13/2024	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of draft of updated Exhibit A for Fourth Amended Complaint; com's with RLS re same	Pleadings and Motions Re: Pleadings
11/13/2024	Guy Wallace	1.5	\$1,350	\$2,025	review and analysis of draft list of potential MILs; revise and edit same	Trial and Pretrial Preparation
11/13/2024	Guy Wallace	1.6	\$1,350	\$2,160	preparation of demonstrative charts re facilities and spaces within facilities; groups of barriers	Trial and Pretrial Preparation
11/13/2024	Guy Wallace	1.1	\$1,350	\$1,485	zoom with JY; BBK; AS; KAS; BU; MTJ; JAU; TCC; RLS re MILs; demonstratives; witness list; exhibit list; results of November 12 CMC	Trial and Pretrial Preparation
11/13/2024	Guy Wallace	0.5	\$1,350	\$675	com's with JAU re preparation of demonstrative charts of common area barriers	Trial and Pretrial Preparation
11/13/2024	Guy Wallace	1.4	\$1,350	\$1,890	review and analysis of draft summary charts re common area barriers; com's with JAU re same	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/13/2024	Jennifer Bybee	1.1	\$925	\$1,018	Zoom call with co-counsel re trial preparation and motions in limine	Trial and Pretrial Preparation
11/13/2024	Jennifer Bybee	0.3	\$925	\$278	Com's with GBW re grouping barriers into charts	Trial and Pretrial Preparation
11/13/2024	Jennifer Bybee	2.1	\$925	\$1,943	Create charts of common barriers in common areas at San Ramon	Trial and Pretrial Preparation
11/13/2024	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re getting charts into evidence	Trial and Pretrial Preparation
11/13/2024	Mark Johnson	0.6	\$1,150	\$690	Zoom team video conference w/ Yelin, Wallace, Spiegel, Steyer, Edmundson, Bybee, Umpierre, Bien-Kahn, Stilber, Munoz, Close re impact on trial prep of ruling on scope of case, identification and assignment of MILs, witness list, exhibit lists, meeting and conferring with opposing counsel	Trial and Pretrial Preparation
11/13/2024	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re MIL related to Anderson testimony contesting measurements.	Trial and Pretrial Preparation
11/13/2024	Rachel Steyer	1.0	\$750	\$750	meeting with RBGG, BSU, GBW, MTJ, TCC, JUB re assignments following CMC	Trial and Pretrial Preparation
11/13/2024	Rachel Steyer	0.2	\$750	\$150	call with GBW re finalizing exhibit A	Trial and Pretrial Preparation
11/13/2024	Travis Close	0.2	\$850	\$170	Review and analyze memo by co-counsel re: visit to Stacia Stiner	Case Organization, Planning and Strategy
11/13/2024	Travis Close	1.4	\$850	\$1,190	Finish assembling photos, text, graphics for FSP/wheelchair securement demonstratives; email to graphics consultant	Trial and Pretrial Preparation
11/13/2024	Travis Close	0.2	\$850	\$170	Email to architectural experts re: photos showing Brookdale vehicles taken at the access inspections	Trial and Pretrial Preparation
11/13/2024	Travis Close	1.1	\$850	\$935	Meeting with GBW, RLS, MTJ, and co-counsel re: debrief after yesterday's CMC	Trial and Pretrial Preparation
11/13/2024	Travis Close	1.8	\$850	\$1,530	Legal research on admissibility of evidence under FRE 107 vs. FRE 1006	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/13/2024	Travis Close	0.8	\$850	\$680	Draft proposal for team re: two-tier demonstrative evidence presentation with chart distinguishing admissibility under FRE 107 / 1006	Trial and Pretrial Preparation
11/13/2024	Travis Close	0.6	\$850	\$510	Legal research on admissibility of expert opinion & underlying evidence under FRE 703	Trial and Pretrial Preparation
11/13/2024	Travis Close	0.4	\$850	\$340	Review and analyze exemplar joint pretrial statement, evidentiary designations, joint exhibit lists, and witness list from another case before Judge Gilliam	Trial and Pretrial Preparation
11/13/2024	Travis Close	1.5	\$850	\$1,275	Create chart showing make, model, total passenger seating, and W/C seating by facility for Brookdale's CA facilities	Trial and Pretrial Preparation
11/14/2024	Guy Wallace	0.6	\$1,350	\$810	com's with MTJ; JAU re preparation of demonstrative charts re San Ramon, Scotts Valley facilities	Trial and Pretrial Preparation
11/14/2024	Guy Wallace	1.1	\$1,350	\$1,485	preparation of demonstrative charts re common area barrier at Brookhurst	Trial and Pretrial Preparation
11/14/2024	Guy Wallace	1.1	\$1,350	\$1,485	com's with Murov; GG; JY; MTJ; JAU; TCC re preparation of demonstratives	Trial and Pretrial Preparation
11/14/2024	Guy Wallace	0.9	\$1,350	\$1,215	preparation of common area barrier charts for Scotts Valley	Trial and Pretrial Preparation
11/14/2024	Guy Wallace	1.1	\$1,350	\$1,485	preparation and drafting of list of further demonstratives re types of barriers; com's with Murov; MTJ; JAU re same	Trial and Pretrial Preparation
11/14/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re facility charts of common area common barriers	Trial and Pretrial Preparation
11/14/2024	Jennifer Bybee	1.2	\$925	\$1,110	Finalize common area common barrier charts for San Ramon	Trial and Pretrial Preparation
11/14/2024	Jennifer Bybee	0.8	\$925	\$740	Zoom call with co-counsel and D. Murov re demonstratives	Trial and Pretrial Preparation
11/14/2024	Jennifer Bybee	0.3	\$925	\$278	Com's with GBW re lists of common barriers and demonstratives	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/14/2024	Jennifer Bybee	2.0	\$925	\$1,850	Create charts of common barriers in common areas for Brookhurst and send same to GBW	Trial and Pretrial Preparation
11/14/2024	Jennifer Bybee	1.4	\$925	\$1,295	Revise common barrier charts for common areas at San Ramon	Trial and Pretrial Preparation
11/14/2024	Jennifer Bybee	0.1	\$925	\$93	Review Brookhurst charts for accuracy	Trial and Pretrial Preparation
11/14/2024	Jennifer Bybee	1.5	\$925	\$1,388	Draft common area common barrier charts for Scotts Valley	Trial and Pretrial Preparation
11/14/2024	Mark Johnson	0.7	\$1,150	\$805	video call w/ D Murov, Yelin, Grunfeld, Wallace, Bybee, Close re demonstratives	Trial and Pretrial Preparation
11/14/2024	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re barrier charts for demonstratives	Trial and Pretrial Preparation
11/14/2024	Mark Johnson	0.3	\$1,150	\$345	further call w/ GBW re demonstratives, common area barriers	Trial and Pretrial Preparation
11/14/2024	Mark Johnson	0.3	\$1,150	\$345	call w/ Stacy Stiner re recent ruling on scope of first trial, injunctive relief, trail plan, her testimony	Trial and Pretrial Preparation
11/14/2024	Mark Johnson	0.1	\$1,150	\$115	call w/ G Grunfeld re witness and exhibit lists	Trial and Pretrial Preparation
11/14/2024	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW re demonstratives of barriers.	Trial and Pretrial Preparation
11/14/2024	Mark Johnson	4.7	\$1,150	\$5,405	prepare complete list of barriers and barrier related demonstratives; coms w/ JAU and GBW re same; review expert report common barrier charts and GBW lists of barriers for same.	Trial and Pretrial Preparation
11/14/2024	Rachel Steyer	0.4	\$750	\$300	call with son of former Scotts Valley resident, discussed case, answered questions	Class Outreach and Contact
11/14/2024	Rachel Steyer	0.3	\$750	\$225	reviewing draft supplemental Kennedy Rule 26 report	Experts (Including Retention)
11/14/2024	Rachel Steyer	0.2	\$750	\$150	review of exemplar exhibit and witness lists from earlier HSG trial	Trial and Pretrial Preparation
11/14/2024	Rachel Steyer	0.2	\$750	\$150	reviewing revised/updated exhibit list circulated by KS	Trial and Pretrial Preparation
11/14/2024	Rachel Steyer	1.7	\$750	\$1,275	preparing updated separate Exhibit A for Fountaingrove, Hemet, Tracy facilities	Trial and Pretrial Preparation
11/14/2024	Rachel Steyer	0.4	\$750	\$300	call with Jim Marshmann re filming video of transfer	Trial and Pretrial Preparation
11/14/2024	Rachel Steyer	0.4	\$750	\$300	response tto JSY and trial team re witness list	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/14/2024	Rachel Steyer	0.8	\$750	\$600	reviewing exhibit A spreadsheet, adding in corresponding barrier report photos and numbers for internal use	Trial and Pretrial Preparation
11/14/2024	Rachel Steyer	0.2	\$750	\$150	reviewing draft witness list circulated by JSY	Trial and Pretrial Preparation
11/14/2024	Rachel Steyer	0.2	\$750	\$150	watching video demonstratives of Stacy Stiner	Trial and Pretrial Preparation
11/14/2024	Travis Close	0.2	\$850	\$170	Review and analyze proposed text for demonstrates re: residency agreement "alterations" provision	Case Organization, Planning and Strategy
11/14/2024	Travis Close	0.3	\$850	\$255	Analyze status of proposed exhibit list and missing info	Case Organization, Planning and Strategy
11/14/2024	Travis Close	0.2	\$850	\$170	Email to team re: proposal for additions to exhibit list	Case Organization, Planning and Strategy
11/14/2024	Travis Close	0.2	\$850	\$170	Review and analyze stip and proposed order re: extension of deadline to file witness lists & testimony estimates	Settlement
11/14/2024	Travis Close	0.7	\$850	\$595	Review and analyze proposed depo designations & memo from co-counsel re: same	Trial and Pretrial Preparation
11/14/2024	Travis Close	1.0	\$850	\$850	Meeting with Debra Murov (consultant), MTJ, GBW, and RBGG co-counsel re: presentation of demonstrative evidence	Trial and Pretrial Preparation
11/14/2024	Travis Close	1.2	\$850	\$1,020	Draft / illustrate slides for FSP-transportation demonstrative evidence	Trial and Pretrial Preparation
11/14/2024	Travis Close	1.4	\$850	\$1,190	Continue drafting / illustrating slides for FSP-transportation demonstrative evidence (first draft); send to co-counsel for review	Trial and Pretrial Preparation
11/14/2024	Travis Close	1.3	\$850	\$1,105	Further revisions to draft demonstrative FSP slides following feedback (add slides for ramps, securement equipment, and vehicles)	Trial and Pretrial Preparation
11/14/2024	Travis Close	1.6	\$850	\$1,360	Further revisions to draft FSP demonstrative slides, incorporating suggestions from JY & GG	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/15/2024	Guy Wallace	3.2	\$1,350	\$4,320	review and analysis of demonstrative charts re barriers at the three facilities; revise and edit same	Trial and Pretrial Preparation
11/15/2024	Guy Wallace	1.4	\$1,350	\$1,890	com's with Murov; GG; JY; MTJ; JAU; TCC re preparation of demonstratives and charts	Trial and Pretrial Preparation
11/15/2024	Jennifer Bybee	1.4	\$925	\$1,295	Finalize Scotts Valley common area common barrier charts	Trial and Pretrial Preparation
11/15/2024	Jennifer Bybee	0.7	\$925	\$648	Zoom call with co-counsel re demonstratives, witness list, and exhibit list status update	Trial and Pretrial Preparation
11/15/2024	Jennifer Bybee	1.2	\$925	\$1,110	Zoom call with co-counsel and D. Murov re demonstratives	Trial and Pretrial Preparation
11/15/2024	Mark Johnson	0.2	\$1,150	\$230	review order denying mtn to decertify class; com w/ gbw re same	Other Motions
11/15/2024	Mark Johnson	1.9	\$1,150	\$2,185	video conference w/ D Murov re demonstratives (.9 with Wallace, Grunfeld, Close, Yelin) then w/o Murov re transportation demonstratives, exhibit and witness list	Trial and Pretrial Preparation
11/15/2024	Rachel Steyer	4.8	\$750	\$3,600	work on reviewing and editing exhibit list	Trial and Pretrial Preparation
11/15/2024	Rachel Steyer	1.1	\$750	\$825	weekly meeting with RBGG, TCC, JUB, BSU to review and discuss tasks and assignments	Trial and Pretrial Preparation
11/15/2024	Travis Close	0.2	\$850	\$170	Emails to co-counsel with question about columns in proposed exhibit list to be shared with Defendants & the court	Case Organization, Planning and Strategy
11/15/2024	Travis Close	1.1	\$850	\$935	Meeting with RLS, BMU, and RBGG co-counsel re: pretrial exhibit list assignments, demonstrative evidence	Case Organization, Planning and Strategy
11/15/2024	Travis Close	3.8	\$850	\$3,230	Revisions to proposed master exhibit spreadsheet (rows 1-67)	Trial and Pretrial Preparation
11/15/2024	Travis Close	0.9	\$850	\$765	Draft proposal & send to team re: construction history evidence to include in proposed exhibit list	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/15/2024	Travis Close	1.0	\$850	\$850	Analyze Cross's Rule 26 report for additional exhibits to add to master exhibit list; send to team	Trial and Pretrial Preparation
11/15/2024	Travis Close	0.7	\$850	\$595	Further updates to draft demonstrative slides for FSP presentation	Trial and Pretrial Preparation
11/15/2024	Travis Close	0.8	\$850	\$680	Meeting with debra murov (consultant) and demonstrative subcommittee re: updates on barrier demonstratives	Trial and Pretrial Preparation
11/15/2024	Travis Close	0.9	\$850	\$765	Meeting with GG, MTJ, and GBW reviewing proposed demonstrative slides	Trial and Pretrial Preparation
11/15/2024	Travis Close	1.5	\$850	\$1,275	Further revisions to draft demonstratives slides for fleet safety policy & transportation	Trial and Pretrial Preparation
11/16/2024	Guy Wallace	0.4	\$1,350	\$540	com's with TMS re summaries of voluminous evidence; pretrial statement and issues re trial time and acceptance of summaries; analysis of same	Trial and Pretrial Preparation
11/16/2024	Guy Wallace	1.0	\$1,350	\$1,350	review and analysis of draft Exhibit List	Trial and Pretrial Preparation
11/16/2024	Guy Wallace	0.8	\$1,350	\$1,080	com's with MTJ re photos for inclusion in demonstratives and summaries of evidence; Exhibit List	Trial and Pretrial Preparation
11/16/2024	Guy Wallace	0.3	\$1,350	\$405	review and analysis of draft Witness List	Trial and Pretrial Preparation
11/16/2024	Guy Wallace	0.5	\$1,350	\$675	com's with JAU re preparation of summaries of barriers	Trial and Pretrial Preparation
11/16/2024	Guy Wallace	0.5	\$1,350	\$675	com's with Mastin re preparation of demonstratives and summary charts re barriers at San Ramon, Scotts Valley and Brookhurst facilities	Trial and Pretrial Preparation
11/16/2024	Jennifer Bybee	0.9	\$925	\$833	Create markup of slides created so far by D. Murov and email to GBW and D. Murov	Trial and Pretrial Preparation
11/16/2024	Jennifer Bybee	0.1	\$925	\$93	Send room common barrier charts to J. Mastin	Trial and Pretrial Preparation
11/16/2024	Mark Johnson	1.1	\$1,150	\$1,265	calls (x3) with GBW re barrier related demonstratives, issues with photographs, ADAAG, CBC descriptions for demonstratives	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/16/2024	Mark Johnson	0.5	\$1,150	\$575	email coms w/ COC re exhibit list items, demonstratives, expert reports	Trial and Pretrial Preparation
11/16/2024	Mark Johnson	7.1	\$1,150	\$8,165	work on barrier related demonstratives, including multiple coms w/ consultant D Murov, reviewing barrier charts, reports and photos, locating and downloading full size photos, coms w/ RAB, Jeff Mastin, J Bybee re issues with barrier charts and photos	Trial and Pretrial Preparation
11/16/2024	Rachel Steyer	1.0	\$750	\$750	further review of potential exhibits, updating joint spreadsheet	Trial and Pretrial Preparation
11/17/2024	Guy Wallace	0.6	\$1,350	\$810	com's with Mastin re preparation of demonstratives and barrier summaries	Trial and Pretrial Preparation
11/17/2024	Guy Wallace	1.7	\$1,350	\$2,295	com's with Murov; GG; JY; BBK; MTJ; JAU re preparation of demonstratives, summaries of barriers, witness list, preparation for meet and confer with Defendants re pretrial submissions	Trial and Pretrial Preparation
11/17/2024	Guy Wallace	0.7	\$1,350	\$945	com's with JAU re preparation of summaries of barriers	Trial and Pretrial Preparation
11/17/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re resident room barrier charts	Trial and Pretrial Preparation
11/17/2024	Jennifer Bybee	0.5	\$925	\$463	Create list of item numbers already included in resident room common barrier exhibits	Trial and Pretrial Preparation
11/17/2024	Jennifer Bybee	1.0	\$925	\$925	Zoom call with D. Murov and co-counsel re demonstratives	Trial and Pretrial Preparation
11/17/2024	Jennifer Bybee	0.3	\$925	\$278	Create redline edit of chart of common resident room barriers at San Ramon and send to D. Murov	Trial and Pretrial Preparation
11/17/2024	Jennifer Bybee	0.1	\$925	\$93	Create redline edit of Brookhurst resident room common barrier chart and send same to D. Murov	Trial and Pretrial Preparation
11/17/2024	Jennifer Bybee	2.3	\$925	\$2,128	Draft resident room common barrier charts for Scotts Valley	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/17/2024	Mark Johnson	0.8	\$1,150	\$920	zoom Call with Debra Murov, Grunfeld, Wallace, Bybee re demonstratives for trial	Trial and Pretrial Preparation
11/17/2024	Mark Johnson	0.7	\$1,150	\$805	continued Zoom call with Grunfeld, Yelin, Wallace re Dec. 3 deadline for filings, meet and confer strategy and schedule with Defendants, assignment of work.	Trial and Pretrial Preparation
11/17/2024	Rachel Steyer	1.1	\$750	\$825	further review of and updating Exhibit A barriers spreadsheet with internal notations	Trial and Pretrial Preparation
11/17/2024	Travis Close	1.5	\$850	\$1,275	Further revisions to master exhibit list (rows 68-100)	Trial and Pretrial Preparation
11/17/2024	Travis Close	0.3	\$850	\$255	Call with MTJ re: photo barrier exemplar assignment	Trial and Pretrial Preparation
11/17/2024	Travis Close	1.6	\$850	\$1,360	Analyze & gather documents cited in Douglas Cross report that are necessary for production to Defs as potential trial exhibits	Trial and Pretrial Preparation
11/17/2024	Travis Close	1.3	\$850	\$1,105	Analyze & organize photos from Scotts Valley showing exemplars from list from designated common unit barriers -- send to consultant for demonstrative slides	Trial and Pretrial Preparation
11/17/2024	Travis Close	0.9	\$850	\$765	Analyze & organize photos from Brookhurst showing exemplars from list from designated common unit barriers -- send to consultant for demonstrative slides	Trial and Pretrial Preparation
11/17/2024	Travis Close	0.7	\$850	\$595	Analyze & organize photos from San Ramon showing exemplars from list from designated common unit barriers -- send to consultant for demonstrative slides	Trial and Pretrial Preparation
11/18/2024	Guy Wallace	0.5	\$1,350	\$675	review and analysis of supplemental expert report of Dr. Kennedy; com's with JY; BU re same	Experts (Including Retention)
11/18/2024	Guy Wallace	0.9	\$1,350	\$1,215	preparation and drafting of MIL re Defendants' purported defenses to Plaintiffs' new construction and alterations claims	Other Motions
11/18/2024	Guy Wallace	0.6	\$1,350	\$810	review and analysis of proposed changes to Exhibit A to Fourth Amended Complaint; com's with RLS re same	Pleadings and Motions Re: Pleadings

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/18/2024	Guy Wallace	1.2	\$1,350	\$1,620	review and analysis of draft of deposition and discovery designations; memoranda of underlying evidence re same	Trial and Pretrial Preparation
11/18/2024	Guy Wallace	2.3	\$1,350	\$3,105	review and analysis of draft witness list; revise and edit same; com's with JY; BBK; MTJ re same	Trial and Pretrial Preparation
11/18/2024	Guy Wallace	0.8	\$1,350	\$1,080	zoom with ER; JB; Jacobsen; GG; JY; BU; TCC re preparation of pretrial submissions and schedule re same; com's with GG; JY; re results of same	Trial and Pretrial Preparation
11/18/2024	Guy Wallace	0.9	\$1,350	\$1,215	zoom with Murov; GG; JY; BBK; MTJ; JAU; TCC re preparation of demonstratives; charts; summaries	Trial and Pretrial Preparation
11/18/2024	Guy Wallace	0.7	\$1,350	\$945	com's with Waters; Mastin re demonstratives; summaries; charts; trial testimony	Trial and Pretrial Preparation
11/18/2024	Guy Wallace	0.5	\$1,350	\$675	com's with Murov re preparation of demonstratives; charts; summaries	Trial and Pretrial Preparation
11/18/2024	Guy Wallace	0.4	\$1,350	\$540	com's with TCC re preparation of demonstratives and photos of barriers re same; construction records re San Ramon and Scotts Valley facilities	Trial and Pretrial Preparation
11/18/2024	Guy Wallace	0.5	\$1,350	\$675	com's with BU re motions in limine; draft witness list; draft exhibit list	Trial and Pretrial Preparation
11/18/2024	Guy Wallace	1.2	\$1,350	\$1,620	review and analysis of drafts of charts and summaries of barriers; revise and edit same; com's with JAU re same (.5)	Trial and Pretrial Preparation
11/18/2024	Jennifer Bybee	1.6	\$925	\$1,480	Finish Scotts Valley resident room charts; email GBW barriers not included	Trial and Pretrial Preparation
11/18/2024	Jennifer Bybee	1.8	\$925	\$1,665	Finalize San Ramon resident room barrier charts	Trial and Pretrial Preparation
11/18/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re status of resident room charts	Trial and Pretrial Preparation
11/18/2024	Jennifer Bybee	0.8	\$925	\$740	Zoom call with D. Murov and co-counsel re demonstratives	Trial and Pretrial Preparation
11/18/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with D. Murov re resident room charts	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/18/2024	Jennifer Bybee	0.2	\$925	\$185	Review email with D. Murov and co-counsel re demonstratives	Trial and Pretrial Preparation
11/18/2024	Jennifer Bybee	2.4	\$925	\$2,220	Finalize drafts of San Ramon facility charts	Trial and Pretrial Preparation
11/18/2024	Jennifer Bybee	1.4	\$925	\$1,295	Finalize Scotts Valley reports	Trial and Pretrial Preparation
11/18/2024	Jennifer Bybee	0.7	\$925	\$648	Edit Brookhurst resident room demonstratives	Trial and Pretrial Preparation
11/18/2024	Jennifer Bybee	0.8	\$925	\$740	Edit San Ramon resident room demonstratives	Trial and Pretrial Preparation
11/18/2024	Jennifer Bybee	0.6	\$925	\$555	Finalize edits to Scotts Valley demonstratives	Trial and Pretrial Preparation
11/18/2024	Mark Johnson	0.5	\$1,150	\$575	review supplemental reports from Mastin/Waters for inclusion on exhibit list, draft email to COC re same.	Trial and Pretrial Preparation
11/18/2024	Mark Johnson	0.7	\$1,150	\$805	zoom mtg w/ graphics consultant D Murov and team re demonstratives	Trial and Pretrial Preparation
11/18/2024	Mark Johnson	0.5	\$1,150	\$575	continued zoom call among trial team following call on demonstratives to discuss exhibit and witness lists	Trial and Pretrial Preparation
11/18/2024	Mark Johnson	2.8	\$1,150	\$3,220	review and edit exhibit list and witness list and email exchanges w/ COC re same and re specific exhibits, issues, strategies re same	Trial and Pretrial Preparation
11/18/2024	Mark Johnson	0.1	\$1,150	\$115	call w/ S Stiner re photos, ED	Trial and Pretrial Preparation
11/18/2024	Rachel Steyer	3.6	\$750	\$2,700	redoing Exhibit A after identifying errors	Trial and Pretrial Preparation
11/18/2024	Rachel Steyer	0.2	\$750	\$150	reviewing remaining Stacy Stiner video demonstratives	Trial and Pretrial Preparation
11/18/2024	Rachel Steyer	1.8	\$750	\$1,350	comparing versions of Exhibit A to identify additions/corrections for GBW	Trial and Pretrial Preparation
11/18/2024	Rachel Steyer	0.2	\$750	\$150	reviewing full list of demonstratives	Trial and Pretrial Preparation
11/18/2024	Rachel Steyer	0.2	\$750	\$150	reviewing updated draft depo designations	Trial and Pretrial Preparation
11/18/2024	Travis Close	0.9	\$850	\$765	Meeting with sub-group and consultant re: update on demonstrative slides	Trial and Pretrial Preparation
11/18/2024	Travis Close	0.4	\$850	\$340	Analysis of ADAAG & appendices for diagrams of reach range to use in demonstratives	Trial and Pretrial Preparation
11/18/2024	Travis Close	0.2	\$850	\$170	Email to DM (consultant) re: demonstrative reach range barriers	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/18/2024	Travis Close	1.3	\$850	\$1,105	Analyze common area barrier demonstrative charts & match to appropriate photos of same for demonstratives - restrooms	Trial and Pretrial Preparation
11/18/2024	Travis Close	1.1	\$850	\$935	Analyze common area barrier demonstrative charts & match to appropriate photos of same for demonstratives - doors	Trial and Pretrial Preparation
11/18/2024	Travis Close	0.7	\$850	\$595	Analyze common area barrier demonstrative charts & match to appropriate photos of same for demonstratives - slopes	Trial and Pretrial Preparation
11/18/2024	Travis Close	0.8	\$850	\$680	Analyze common area barrier demonstrative charts & match to appropriate photos of same for demonstratives - social area surfaces	Trial and Pretrial Preparation
11/18/2024	Travis Close	1.4	\$850	\$1,190	Analyze common area barrier demonstrative charts & match to appropriate photos of same for demonstratives - parking	Trial and Pretrial Preparation
11/18/2024	Travis Close	0.4	\$850	\$340	Email to team re: custodian of records declarations for san ramon, scotts valley, brookhurst	Trial and Pretrial Preparation
11/18/2024	Travis Close	0.5	\$850	\$425	Emails to RAB & DM (consultant) transferring demonstrative photos over for slide creation	Trial and Pretrial Preparation
11/19/2024	Guy Wallace	1.1	\$1,350	\$1,485	legal research and analysis re MIL re good faith efforts to comply with ADA; no requirement for pre-litigation notice or complaints	Other Motions
11/19/2024	Guy Wallace	1.6	\$1,350	\$2,160	review and analysis of draft designations of deposition testimony and Defendants' discovery responses; review and analysis of Defendants' supplemental interrogatory responses; com's with JY re same (.2)	Trial and Pretrial Preparation
11/19/2024	Guy Wallace	1.4	\$1,350	\$1,890	zoom with Murov; GG; JY; MTJ; JAU; TCC re preparation of demonstratives, summaries and charts; com's with JAU re same	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/19/2024	Guy Wallace	0.3	\$1,350	\$405	com's with GG; JY; MTJ re Defendants' proposal to exchange demonstratives and summaries on 11/26	Trial and Pretrial Preparation
11/19/2024	Guy Wallace	1.7	\$1,350	\$2,295	review and analysis of near final draft of exhibit list; revise and edit same; com's with JY; MTJ re same (.5)	Trial and Pretrial Preparation
11/19/2024	Guy Wallace	2.4	\$1,350	\$3,240	preparation of revised time estimates for witnesses; com's with MTJ re same (.5)	Trial and Pretrial Preparation
11/19/2024	Jennifer Bybee	0.1	\$925	\$93	Review emails with co-counsel re demonstratives	Trial and Pretrial Preparation
11/19/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re demonstrative status and deadline	Trial and Pretrial Preparation
11/19/2024	Jennifer Bybee	1.4	\$925	\$1,295	Zoom call with co-counsel and D. Murov re demonstrative status	Trial and Pretrial Preparation
11/19/2024	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re trial issues and settlement prospects	Settlement
11/19/2024	Mark Johnson	1.2	\$1,150	\$1,380	call w/ graphics consultant to review and comment on demonstratives	Trial and Pretrial Preparation
11/19/2024	Mark Johnson	0.4	\$1,150	\$460	Zoom w/ Travis and Jenny re construction history docs for exhibit list	Trial and Pretrial Preparation
11/19/2024	Mark Johnson	0.8	\$1,150	\$920	call w/ GBW re trial strategy, witness order, organization of presentation	Trial and Pretrial Preparation
11/19/2024	Mark Johnson	0.5	\$1,150	\$575	call w/ GBW re witness time estimates, potential area of testimony from EDs and other witnesses	Trial and Pretrial Preparation
11/19/2024	Mark Johnson	0.5	\$1,150	\$575	review email from OC re timing of demonstrative exchanges; follow up email exchanges w/ COC re proposed response, strategy, pros and cons, review and agree w/ draft proposed response.	Trial and Pretrial Preparation
11/19/2024	Mark Johnson	0.4	\$1,150	\$460	review new FRE 107 and secondary materials re demonstratives v illustrative aids for response to Ds re timing of exchange.	Trial and Pretrial Preparation
11/19/2024	Mark Johnson	1.3	\$1,150	\$1,495	review and provide edits and comments on draft witness list and exhibit list, coms w/ COC re same.	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/19/2024	Mark Johnson	1.6	\$1,150	\$1,840	further coms w/ COC re exhibits for exhibit list including floor plans, Contrsuction and permit documents, construction binders, review same	Trial and Pretrial Preparation
11/19/2024	Rachel Steyer	1.3	\$750	\$975	reviewing and identifying additional exhibits to add to list	Trial and Pretrial Preparation
11/19/2024	Rachel Steyer	3.5	\$750	\$2,625	further review of and correcting exhibit A barriers spreadsheet	Trial and Pretrial Preparation
11/19/2024	Rachel Steyer	0.3	\$750	\$225	email to GBW outlining additional errors/corrections made to Exhibit A, transmitting documents for review	Trial and Pretrial Preparation
11/19/2024	Rachel Steyer	0.2	\$750	\$150	reviewing further internal correspondence with trial team re adding in and finalizing exhibit list	Trial and Pretrial Preparation
11/19/2024	Rachel Steyer	1.0	\$750	\$750	reviewing and making corrections to separate exhibit A spreadsheet for Hemet/Fountaingrove/Tracy	Trial and Pretrial Preparation
11/19/2024	Travis Close	1.6	\$850	\$1,360	Meeting with demonstrative graphics consultant & subgroup re: update on trial demonstratives	Trial and Pretrial Preparation
11/19/2024	Travis Close	0.7	\$850	\$595	Review, analyze, and propose revisions to draft witness list	Trial and Pretrial Preparation
11/19/2024	Travis Close	0.9	\$850	\$765	Review and analyze latest draft of proposed trial exhibits for necessary additions	Trial and Pretrial Preparation
11/19/2024	Travis Close	1.6	\$850	\$1,360	Analysis of floor plans produced by Brookdale & third parties for San Ramon, Scotts Valley, and Brookhurst for best demonstrative / visual aids	Trial and Pretrial Preparation
11/19/2024	Travis Close	0.7	\$850	\$595	Review and analyze evidence of Brookdale's operational activities for additional exhibits to add to trial exhibit charts	Trial and Pretrial Preparation
11/19/2024	Travis Close	1.5	\$850	\$1,275	Additions to proposed exhibits - essential construction history records for San Ramon, Scotts Valley, Brookhurst	Trial and Pretrial Preparation
11/19/2024	Travis Close	0.4	\$850	\$340	Final review of proposed witness & exhibit lists before sending to opposing counsel	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/19/2024	Travis Close	0.2	\$850	\$170	Email to team re: construction history binders	Trial and Pretrial Preparation
11/19/2024	Travis Close	0.2	\$850	\$170	Email to team re: summary of evidence of Jeanette Algarne's FSP/wheelchair complaints	Trial and Pretrial Preparation
11/19/2024	Travis Close	0.2	\$850	\$170	Email to DM (consultant) with picture of accessible doorknob	Trial and Pretrial Preparation
11/20/2024	Guy Wallace	3.1	\$1,350	\$4,185	preparation and drafting of Plaintiffs' MIL number 4	Other Motions
11/20/2024	Guy Wallace	1.2	\$1,350	\$1,620	review and analysis of Defendants' witness list; com's with JY; BU; MTJ re same	Trial and Pretrial Preparation
11/20/2024	Guy Wallace	0.7	\$1,350	\$945	preparation of draft estimates re cross examination time	Trial and Pretrial Preparation
11/20/2024	Guy Wallace	0.8	\$1,350	\$1,080	zoom with GG; JY; KS; BU; MTJ; TCC; RLS re preparation of pretrial submissions for 12/3/24	Trial and Pretrial Preparation
11/20/2024	Guy Wallace	0.9	\$1,350	\$1,215	revise and edit Plaintiffs' meet and confer list re motions in limine	Trial and Pretrial Preparation
11/20/2024	Guy Wallace	0.6	\$1,350	\$810	revise and edit draft of summaries and charts re access barriers at San Ramon, Scotts Valley and Brookhurst facilities	Trial and Pretrial Preparation
11/20/2024	Jennifer Bybee	1.3	\$925	\$1,203	Create redline edits of Brookhurst Resident Room charts and send to D. Murov	Trial and Pretrial Preparation
11/20/2024	Jennifer Bybee	3.0	\$925	\$2,775	Create redline edits of Scotts Valley demonstratives and send to GBW	Trial and Pretrial Preparation
11/20/2024	Jennifer Bybee	0.3	\$925	\$278	Com's with GBW re demonstratives	Trial and Pretrial Preparation
11/20/2024	Jennifer Bybee	0.9	\$925	\$833	Zoom call with co-counsel re planning for trial preparation over next two weeks	Trial and Pretrial Preparation
11/20/2024	Mark Johnson	0.2	\$1,150	\$230	coms w COC Yelin and Grunfeld and with GBW re sending list of MILs to Ds	Other Motions
11/20/2024	Mark Johnson	1.4	\$1,150	\$1,610	work on MIL re Anderson testimony and photos; review depo testimony and report and law re same.	Other Motions
11/20/2024	Mark Johnson	0.2	\$1,150	\$230	Call w GBW re individuals on defendants' witness list.	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/20/2024	Mark Johnson	0.3	\$1,150	\$345	Review Brookdale's witness list and exhibit list, coms w/ GBW re same	Trial and Pretrial Preparation
11/20/2024	Mark Johnson	2.2	\$1,150	\$2,530	download and review Defendants documents produced with exhibit list and witness list, including photos, web site pages, videos and other documents; prepare summary of same, coms w/ COC re same	Trial and Pretrial Preparation
11/20/2024	Mark Johnson	0.4	\$1,150	\$460	review revised list of proposed MILs, proposed edits to same, review further revisions from GBW	Trial and Pretrial Preparation
11/20/2024	Mark Johnson	0.9	\$1,150	\$1,035	Team zoom meeting with Grunfeld, Yelin, Bien-Kahn, Spiegel, Campbell, BSU, GBW, RLS, TCC, JUB to review and discuss upcoming pretrial deadlines, tasks, and assignments	Trial and Pretrial Preparation
11/20/2024	Mark Johnson	0.3	\$1,150	\$345	review memo from Maya Campbell re authenticity, admissibility of exhibits, depo designations for trial.	Trial and Pretrial Preparation
11/20/2024	Mark Johnson	0.7	\$1,150	\$805	calls w/ GBW (x5) re Ds witnesses, exhibits, motions in limine	Trial and Pretrial Preparation
11/20/2024	Rachel Steyer	4.0	\$750	\$3,000	reviewing production for documetns corresponding to new Brookdale EDs/employees	Discovery (Non-Deposition)
11/20/2024	Rachel Steyer	0.4	\$750	\$300	reviewing defendants' witness and exhibit lists	Trial and Pretrial Preparation
11/20/2024	Rachel Steyer	0.2	\$750	\$150	reviewing draft MIL re direct threat	Trial and Pretrial Preparation
11/20/2024	Rachel Steyer	0.9	\$750	\$675	meeting with RBGG, BSU, GBW, MTJ, TCC, JUB to review and discuss upcoming pretrial deadlines, tasks, and assignments	Trial and Pretrial Preparation
11/20/2024	Rachel Steyer	0.5	\$750	\$375	meeting with TCC to review and discuss preparing exhibit objections	Trial and Pretrial Preparation
11/20/2024	Rachel Steyer	0.5	\$750	\$375	reviewing memo re admissibility of exhibits and depo designation examples	Trial and Pretrial Preparation
11/20/2024	Travis Close	0.4	\$850	\$340	Review and analyze Defendants' spreadsheet of proposed trial exhibits	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/20/2024	Travis Close	0.7	\$850	\$595	Review and analyze defendants' proposed witness list & research prior history of disclosure of witnesses	Trial and Pretrial Preparation
11/20/2024	Travis Close	0.2	\$850	\$170	Review and analyze draft MIL re: direct threat defense	Trial and Pretrial Preparation
11/20/2024	Travis Close	0.7	\$850	\$595	Research common objections to a party's proposed trial exhibits	Trial and Pretrial Preparation
11/20/2024	Travis Close	0.3	\$850	\$255	Compare Defendants' witness list to witnesses identified in initial disclosures	Trial and Pretrial Preparation
11/20/2024	Travis Close	0.9	\$850	\$765	Meet with RLS, GBW, MTJ, and co-counsel re: assignments for next week of pretrial preparation; jury instructions; objections to Def's exhibits; etc	Trial and Pretrial Preparation
11/20/2024	Travis Close	0.6	\$850	\$510	Meet with RLS re: dividing up assignment - objections to trial exhibits	Trial and Pretrial Preparation
11/20/2024	Travis Close	0.3	\$850	\$255	Email to team with instructions for Def's trial exhibit objections	Trial and Pretrial Preparation
11/20/2024	Travis Close	1.3	\$850	\$1,105	Additions to demonstratives -- tactile signage -- research and analyze appropriate standards, create graphics	Trial and Pretrial Preparation
11/20/2024	Travis Close	0.3	\$850	\$255	Review and analyze memo by co-counsel re: authenticity and admissibility of documents	Trial and Pretrial Preparation
11/20/2024	Travis Close	0.8	\$850	\$680	Review and analyze Def's production of new photos/videos proposed in their exhibit list	Trial and Pretrial Preparation
11/21/2024	Guy Wallace	0.7	\$1,350	\$945	com's with BU; MTJ re preparation of motions in limine and issues to be included in same	Other Motions
11/21/2024	Guy Wallace	2.8	\$1,350	\$3,780	preparation and drafting of MIL number 4 re Defendants' affirmative defenses	Other Motions
11/21/2024	Guy Wallace	0.9	\$1,350	\$1,215	com's with MTJ re impact of limiting first trial to Unruh Act and CBC violations at the San Ramon and Scotts Valley facilities	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/21/2024	Guy Wallace	0.6	\$1,350	\$810	com's with GG re intent requirement under the Unruh Act and Plaintiffs' potential proof re same; jury trial right	Trial and Pretrial Preparation
11/21/2024	Guy Wallace	0.4	\$1,350	\$540	com's with BU re intentionality requirement under the Unruh Act and potential jury assessments of evidence re same	Trial and Pretrial Preparation
11/21/2024	Guy Wallace	1.2	\$1,350	\$1,620	com's with MTJ re willful, affirmative misconduct under the Unruh Act; potential proof of same set forth in the summary judgment opposition brief; other evidence in the record that would support a showing of intent; further case law re same; potential use of testimony from Eidler re same	Trial and Pretrial Preparation
11/21/2024	Guy Wallace	0.9	\$1,350	\$1,215	zoom with Ruther; Bertino; Jacobsen; GG; JY; BU; MTJ re motions in limine	Trial and Pretrial Preparation
11/21/2024	Guy Wallace	0.8	\$1,350	\$1,080	zoom with GG; JY; BBK; BU; MTJ re Unruh Act and claims of intentional discrimination; motions in limine; trial structure	Trial and Pretrial Preparation
11/21/2024	Guy Wallace	1.6	\$1,350	\$2,160	review and analysis of charts and summaries re access barriers at San Ramon and Scotts Valley; com's with JAU re same (.4)	Trial and Pretrial Preparation
11/21/2024	Jennifer Bybee	0.1	\$925	\$93	Review emails with co-counsel re trial preparation	Trial and Pretrial Preparation
11/21/2024	Jennifer Bybee	2.0	\$925	\$1,850	Review and create redline edits of San Ramon resident room charts	Trial and Pretrial Preparation
11/21/2024	Jennifer Bybee	0.1	\$925	\$93	Review emails with co-counsel re scheduling and pretrial preparation	Trial and Pretrial Preparation
11/21/2024	Jennifer Bybee	0.2	\$925	\$185	Email D. Murov remaining Scotts Valley resident room chart Edits	Trial and Pretrial Preparation
11/21/2024	Jennifer Bybee	1.6	\$925	\$1,480	Edit and create redline edit of Scotts Valley Common area charts	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/21/2024	Jennifer Bybee	0.5	\$925	\$463	Finalize edits to Scotts Valley Common Area barrier charts	Trial and Pretrial Preparation
11/21/2024	Jennifer Bybee	0.3	\$925	\$278	Review Brookhurst Resident Room chart demonstratives	Trial and Pretrial Preparation
11/21/2024	Jennifer Bybee	2.4	\$925	\$2,220	Finalize edits to common area demonstrative charts	Trial and Pretrial Preparation
11/21/2024	Mark Johnson	0.3	\$1,150	\$345	pre-call w/ GBW re strategy on meet and confer re MIL's follow up email to COC re same and role in call.	Other Motions
11/21/2024	Mark Johnson	0.4	\$1,150	\$460	review and edit draft email from JY setting forth agreements re issues and MILs for OC	Other Motions
11/21/2024	Mark Johnson	0.3	\$1,150	\$345	review depo transcript of G waters and draft email for OC re same and offer to make Waters/Mastin available for depo re supp reports and declarations, coms w/ COC re same.	Other Motions
11/21/2024	Mark Johnson	1.9	\$1,150	\$2,185	continue to work on MIL re Anderson testimony and review depo transcripts related to same.	Other Motions
11/21/2024	Mark Johnson	1.3	\$1,150	\$1,495	meet and confer w/ OC Rutner, Bertino, Jacobsen, re motions in limine, including Wallace, Grunfeld, Umpierre, Yelin	Trial and Pretrial Preparation
11/21/2024	Mark Johnson	0.3	\$1,150	\$345	follow up call w/ GBW re MIL discussion w/ OC	Trial and Pretrial Preparation
11/21/2024	Mark Johnson	0.8	\$1,150	\$920	follow up call w/ Wallace, Grunfeld, Yelin, Bien-Kahn re follow-up to MIL discussion, stipulations re same, action items.	Trial and Pretrial Preparation
11/21/2024	Mark Johnson	0.7	\$1,150	\$805	call w/ Potential witness Sharon Eidler	Trial and Pretrial Preparation
11/21/2024	Mark Johnson	0.9	\$1,150	\$1,035	call w GBW re proposed email to OC concerning stipulations and MILs, limitation of first trial to CBC/Unruh for SV and SR facilities, impact of same, review of reports to identify types of barriers that would be omitted, amendments to demonstratives	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/21/2024	Mark Johnson	0.5	\$1,150	\$575	call w/ GBW re proof of intent and related MIL to exclude evidence not directed to barrier removal issue	Trial and Pretrial Preparation
11/21/2024	Mark Johnson	0.6	\$1,150	\$690	calls (x2) w/ GBW re MILs, trial strategy	Trial and Pretrial Preparation
11/21/2024	Mark Johnson	0.5	\$1,150	\$575	call w/ GBW re Sharon Eidler as potential witness, Unruh intention requirement and cases supporting our argument re willful affirmative misconduct.	Trial and Pretrial Preparation
11/21/2024	Mark Johnson	0.7	\$1,150	\$805	Research and review cases re intention and willful affirmative misconduct	Trial and Pretrial Preparation
11/21/2024	Mark Johnson	0.3	\$1,150	\$345	zoom call and email exchanges w/ R Bonner re resources for trial prep, downloading Ds documents	Trial and Pretrial Preparation
11/21/2024	Rachel Steyer	0.3	\$750	\$225	reviewing updated draft MIL	Other Motions
11/21/2024	Rachel Steyer	0.2	\$750	\$150	transmitting Ann Wahl depo excerpt to trial team re objection to declarant exhibit	Trial and Pretrial Preparation
11/21/2024	Travis Close	0.8	\$850	\$680	Further revisions to tactile exit sign demonstrative to incorporate feedback by jeff mastin	Trial and Pretrial Preparation
11/21/2024	Travis Close	0.2	\$850	\$170	Email to jeff mastin re: braille requirements for tactile exit signage	Trial and Pretrial Preparation
11/21/2024	Travis Close	1.6	\$850	\$1,360	Additions and revisions to objections to def's proposed exhibit list	Trial and Pretrial Preparation
11/21/2024	Travis Close	0.4	\$850	\$340	Review and analyze latest set of demonstratives by DM (consultant)	Trial and Pretrial Preparation
11/21/2024	Travis Close	0.8	\$850	\$680	Review and analyze docs produced in Def's 11-19 production (Brookhurst photos, 1998 ADAAG manual, 2004 ADAAG Manual, 10-k annual reports)	Trial and Pretrial Preparation
11/21/2024	Travis Close	1.1	\$850	\$935	Review and analyze docs produced in Def's 11-19 production (wheelchair securement videos, HCS website, RESNA website pages, DOJ Technical assistance manual except, CBC website, JD Power Reviews, U. Of Michigan webpages, U.S. News & World Report)	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/21/2024	Travis Close	0.7	\$850	\$595	Legal research on whether websites are hearsay & whether exceptions apply	Trial and Pretrial Preparation
11/21/2024	Travis Close	0.7	\$850	\$595	Search files for return receipts from 3/2017 and 6/2017 letters to Chad White / Brookdale's counsel	Trial and Pretrial Preparation
11/21/2024	Travis Close	0.2	\$850	\$170	Review and analyze Def's corrected depo designations	Trial and Pretrial Preparation
11/21/2024	Travis Close	0.2	\$850	\$170	Review and analyze comparison spreadsheet b/t Pltf's and Def's exhibits	Trial and Pretrial Preparation
11/21/2024	Travis Close	1.3	\$850	\$1,105	Review and analyze BBK declaration (ECF 508-4) and associated exhibits re: testimony of Happy campers lacking knowledge of declarations & Depo Tr. of Ann Wahl; revisions to objections to Def's exhibits re same	Trial and Pretrial Preparation
11/22/2024	Guy Wallace	3.4	\$1,350	\$4,590	preparation and drafting of Plaintiffs' MIL number four	Other Motions
11/22/2024	Guy Wallace	0.9	\$1,350	\$1,215	analysis of arguments re MIL number four; MIL re Defendants' evidence of "intent"; com's with MTJ re same	Other Motions
11/22/2024	Guy Wallace	1.5	\$1,350	\$2,025	zoom with GG; JY; BBK; BM; AS; KS; MTJ; TCC; RLS re preparation of MILs; time estimates for witnesses; revisions to exhibit list and witness list	Trial and Pretrial Preparation
11/22/2024	Guy Wallace	1.3	\$1,350	\$1,755	zoom with Murov; GG; JY; MTJ; JAU re demonstratives. summaries and charts and revisions thereto	Trial and Pretrial Preparation
11/22/2024	Guy Wallace	1.4	\$1,350	\$1,890	review and analysis of revised versions of summaries and charts re barriers at San Ramon, Scotts Valley and Brookhurst; com's with MTJ; JAU re same (.6)	Trial and Pretrial Preparation
11/22/2024	Jennifer Bybee	1.1	\$925	\$1,018	Review and create redline edits of San Ramon common areas	Trial and Pretrial Preparation
11/22/2024	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re edits to demonstratives	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/22/2024	Jennifer Bybee	1.0	\$925	\$925	Review edited slides of Scotts Valley and other facilities	Trial and Pretrial Preparation
11/22/2024	Jennifer Bybee	1.2	\$925	\$1,110	Zoom meeting with co-counsel re demonstratives	Trial and Pretrial Preparation
11/22/2024	Jennifer Bybee	0.8	\$925	\$740	Edit demonstrative text for all facilities	Trial and Pretrial Preparation
11/22/2024	Jennifer Bybee	0.3	\$925	\$278	Revise Brookhurst resident and common area barrier lists based on removing items not contained in ADAAG or 1998 CBC	Trial and Pretrial Preparation
11/22/2024	Jennifer Bybee	2.5	\$925	\$2,313	Edit and revise facility charts based on applicable standards	Trial and Pretrial Preparation
11/22/2024	Mark Johnson	2.2	\$1,150	\$2,530	work on MIL re evidence of lack of intent under Unruh Act.	Other Motions
11/22/2024	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW re MILs including intent issue, equivalent access, subsequent ownership claims	Other Motions
11/22/2024	Mark Johnson	0.3	\$1,150	\$345	review San Ramon Mastin barrier report and Anderson annotated version to assess impact of limiting barrier claims to CBC violations, draft email to COC re same.	Trial and Pretrial Preparation
11/22/2024	Mark Johnson	1.5	\$1,150	\$1,725	zoom team mtg re demonstratives with Murov, Grunfeld, Bybee, Yelin, Wallace.	Trial and Pretrial Preparation
11/22/2024	Mark Johnson	2.0	\$1,150	\$2,300	Zoom team mtg re trial prep, exhibit list, witness list, trial time estimates, MILs, demonstratives, MIL opps, jury instructions, Voire dire, verdict forms, proposed statement of case, joint pre-trial statement, exhibit list objections, depo and discovery objections with Munoz, Grunfeld, Wallace, Close, Steyer, Stilber, Edmundson, Bien-Kahn, Steyer, Spiegel, Campbell	Trial and Pretrial Preparation
11/22/2024	Mark Johnson	0.2	\$1,150	\$230	Call w/ J Yelin and G Grunfeld re description of expected testimony of Sharon Eidler for witness list.	Trial and Pretrial Preparation
11/22/2024	Mark Johnson	0.5	\$1,150	\$575	call w/ GBW re demonstratives, MILs	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/22/2024	Mark Johnson	0.6	\$1,150	\$690	review revised demonstrative tables, coms w/ J Bybee and D Murov re same, review barrier report on particular barrier included in table.	Trial and Pretrial Preparation
11/22/2024	Rachel Steyer	0.9	\$750	\$675	reviewing production for San Ramon family council meeting notes that discuss barriers	Discovery (Non-Deposition)
11/22/2024	Rachel Steyer	0.2	\$750	\$150	reviewing email and corresponding notes from BBK analyzing HSG's pre-trial conference notes/observations	Trial and Pretrial Preparation
11/22/2024	Rachel Steyer	2.7	\$750	\$2,025	final review and comparison of corrected exhibit A to previous served version, preparing errata	Trial and Pretrial Preparation
11/22/2024	Rachel Steyer	1.0	\$750	\$750	reviewing and updating Exhibit A internal barrier and photo numbers	Trial and Pretrial Preparation
11/22/2024	Rachel Steyer	2.0	\$750	\$1,500	meeting with RBGG, GBW, MTJ, TCC, BSU, JUB to review and discuss pre-trial deadlines and assignments	Trial and Pretrial Preparation
11/22/2024	Rachel Steyer	0.2	\$750	\$150	reviewing and editing AS draft MIL	Trial and Pretrial Preparation
11/22/2024	Travis Close	0.3	\$850	\$255	Review and analyze BBK notes re: pretrial conference from Pacific Steel jury trial	Trial and Pretrial Preparation
11/22/2024	Travis Close	1.3	\$850	\$1,105	Review and analyze transcript of pre-trial conference from Pacific Steel jury trial (Gilliam)	Trial and Pretrial Preparation
11/22/2024	Travis Close	0.3	\$850	\$255	Review and analyze General Order 6 from N.D. Ca - Jury plan	Trial and Pretrial Preparation
11/22/2024	Travis Close	1.3	\$850	\$1,105	Meeting with demonstratives sub-group and consultant re: update on demonstratives	Trial and Pretrial Preparation
11/22/2024	Travis Close	0.6	\$850	\$510	Legal research on exceptions to hearsay rule	Trial and Pretrial Preparation
11/22/2024	Travis Close	2.0	\$850	\$1,700	Weekly meeting with co-counsel re: trial preparation tasks: updated exhibit list, objections to Def's exhibits	Trial and Pretrial Preparation
11/22/2024	Travis Close	0.2	\$850	\$170	Email to team re: proposal for stipulation regarding post-2024 FSP implementation	Trial and Pretrial Preparation
11/22/2024	Travis Close	0.7	\$850	\$595	Revisions to proposed objections to Def's exhibits	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/22/2024	Travis Close	0.2	\$850	\$170	Email to team re: language for common types of objections to trial exhibits	Trial and Pretrial Preparation
11/22/2024	Travis Close	0.3	\$850	\$255	Email to demonstrative slides sub-group re: photos still needed for resident room common barriers	Trial and Pretrial Preparation
11/22/2024	Travis Close	0.7	\$850	\$595	Analyze & create organizational structure for san ramon common barriers that still need photographs	Trial and Pretrial Preparation
11/23/2024	Guy Wallace	4.2	\$1,350	\$5,670	preparation and drafting of Plaintiffs' MIL number four	Other Motions
11/23/2024	Jennifer Bybee	0.2	\$925	\$185	Review emails with D. Murov and co-counsel re demonstratives	Trial and Pretrial Preparation
11/23/2024	Jennifer Bybee	0.3	\$925	\$278	Com's with D. Murov re status update	Trial and Pretrial Preparation
11/23/2024	Mark Johnson	5.8	\$1,150	\$6,670	Work on MIL re evidence of discriminatory intent, including research and review of documents re same.	Other Motions
11/23/2024	Mark Johnson	0.2	\$1,150	\$230	coms w/ GBW re MIL on intent evidence and improper defenses	Other Motions
11/23/2024	Mark Johnson	0.5	\$1,150	\$575	Review complete set of demonstratives received from Envision on this date, email GBW, JAU re same	Trial and Pretrial Preparation
11/23/2024	Mark Johnson	0.5	\$1,150	\$575	review and compare Mastin SV and SR reports re kitchen base cabinet and counter height barriers under 85 and 89 CBC, draft email to J Mastin re apparent discrepancy with language from CBC and explanation of issue	Trial and Pretrial Preparation
11/23/2024	Rachel Steyer	3.4	\$750	\$2,550	double checking and adding in additional photos and barrier numbers to spreadsheet	Trial and Pretrial Preparation
11/24/2024	Guy Wallace	4.3	\$1,350	\$5,805	preparation and drafting of Plaintiffs' MIL number 4; revise and edit same	Other Motions
11/24/2024	Guy Wallace	0.9	\$1,350	\$1,215	revise and edit MIL #3	Other Motions
11/24/2024	Guy Wallace	1.6	\$1,350	\$2,160	revise and edit MIL #2	Other Motions
11/24/2024	Guy Wallace	1.2	\$1,350	\$1,620	zoom with Murov; GG; JY; MTJ; JAU; TCC re demonstratives, charts and summaries	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/24/2024	Guy Wallace	1.7	\$1,350	\$2,295	revise and edit demonstratives, charts and summaries re barriers; com's with MTJ; TCC; JAU re same	Trial and Pretrial Preparation
11/24/2024	Guy Wallace	2.1	\$1,350	\$2,835	com's with BU; MTJ; JAU re GG proposal re potential jury waiver	Trial and Pretrial Preparation
11/24/2024	Jennifer Bybee	0.2	\$925	\$185	Review email with co-counsel and D. Murov re demonstrative edits	Trial and Pretrial Preparation
11/24/2024	Jennifer Bybee	2.5	\$925	\$2,313	Edit and revise facility common area and resident room charts	Trial and Pretrial Preparation
11/24/2024	Jennifer Bybee	0.7	\$925	\$648	Zoom meeting with co-counsel and D. Murov re demonstratives	Trial and Pretrial Preparation
11/24/2024	Jennifer Bybee	0.5	\$925	\$463	Edit Brookhurst Common Area demonstrative text and email to GBW	Trial and Pretrial Preparation
11/24/2024	Jennifer Bybee	0.3	\$925	\$278	Com's with GBW re intent, demonstratives etc.	Trial and Pretrial Preparation
11/24/2024	Mark Johnson	0.3	\$1,150	\$345	review and propose edits to MIL 2 from BU	Other Motions
11/24/2024	Mark Johnson	0.2	\$1,150	\$230	review GCG edits to MIL re intent; email exchange re same.	Other Motions
11/24/2024	Mark Johnson	0.3	\$1,150	\$345	Call w/ GBW re status of demonstratives, strategy going forward	Trial and Pretrial Preparation
11/24/2024	Mark Johnson	0.1	\$1,150	\$115	call w/ J Yelin re objections to Anderson photos	Trial and Pretrial Preparation
11/24/2024	Mark Johnson	0.9	\$1,150	\$1,035	call w/ GBW re proposal to waive jury for first trial; ramifications of same and strategy/mechanism for trying to do so.	Trial and Pretrial Preparation
11/24/2024	Mark Johnson	0.7	\$1,150	\$805	zoom call w GBW, Grunfeld, Close, Murov, Bybee re demonstratives.	Trial and Pretrial Preparation
11/24/2024	Mark Johnson	0.3	\$1,150	\$345	call w/ Grunfeld, Wallace, Yelin re meet and confer strategy, topics for the next day; filings for Tuesday, MILs	Trial and Pretrial Preparation
11/24/2024	Mark Johnson	0.4	\$1,150	\$460	calls x2 w GBW re proposal to withdraw jury trial demand, pros and cons of same.	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/24/2024	Mark Johnson	2.3	\$1,150	\$2,645	review and analyze San Ramon, Scotts Valley and Brookhurst barrier reports, prepare memo listing and discussing all barriers not covered by applicable CBC and/or ADAAG; coms w/ COC re same	Trial and Pretrial Preparation
11/24/2024	Mark Johnson	0.5	\$1,150	\$575	draft email memo to J Mastin with questions re barriers for demonstratives.	Trial and Pretrial Preparation
11/24/2024	Rachel Steyer	2.0	\$750	\$1,500	completing adding photo and barrier report numbers into internal exhibit A barriers spreadsheet	Trial and Pretrial Preparation
11/24/2024	Rachel Steyer	0.2	\$750	\$150	locating earlier emails with case law research re ADA and table barriers, transmitting to GBW	Trial and Pretrial Preparation
11/24/2024	Travis Close	1.3	\$850	\$1,105	Review, analyze, and select exemplar common barriers for demonstrative slides -- San Ramon	Trial and Pretrial Preparation
11/24/2024	Travis Close	1.2	\$850	\$1,020	Review, analyze, and select exemplar common barriers for demonstrative slides -- Scotts Valley	Trial and Pretrial Preparation
11/24/2024	Travis Close	1.8	\$850	\$1,530	Review, analyze, and select exemplar common barriers for demonstrative slides; send to consultant for incorporation -- Brookhurst	Trial and Pretrial Preparation
11/24/2024	Travis Close	0.8	\$850	\$680	Meeting with demonstratives sub-team re: status of slides preparation and tasks left to complete	Trial and Pretrial Preparation
11/25/2024	Guy Wallace	0.7	\$1,350	\$945	legal research and analysis re access barriers and completely deny access; MIL #2	Other Motions
11/25/2024	Guy Wallace	1.6	\$1,350	\$2,160	revise and edit MIL #2 and MIL #3	Other Motions
11/25/2024	Guy Wallace	1.6	\$1,350	\$2,160	preparation of draft jury instructions	Trial and Pretrial Preparation
11/25/2024	Guy Wallace	1.4	\$1,350	\$1,890	zoom with Murov; GG; MTJ; JAU; TCC re demonstratives, summaries and charts; revisions thereto	Trial and Pretrial Preparation
11/25/2024	Guy Wallace	0.4	\$1,350	\$540	com's with BU; MTJ re meet and confer with Defendants re motions in limine	Trial and Pretrial Preparation
11/25/2024	Guy Wallace	0.5	\$1,350	\$675	zoom with Chopra; GG; MTJ re voir dire	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/25/2024	Guy Wallace	0.9	\$1,350	\$1,215	com's with Mastin; Waters; MTJ; JAU re preparation of summaries and charts re barrier data	Trial and Pretrial Preparation
11/25/2024	Guy Wallace	0.4	\$1,350	\$540	com's with RLS re preparation of draft jury instructions	Trial and Pretrial Preparation
11/25/2024	Guy Wallace	3.8	\$1,350	\$5,130	preparation and drafting of jury instructions	Trial and Pretrial Preparation
11/25/2024	Jennifer Bybee	0.1	\$925	\$93	Review com's with co-counsel re demonstratives and MILs	Trial and Pretrial Preparation
11/25/2024	Jennifer Bybee	0.3	\$925	\$278	Com's with D. Murov and TCC re whether or not two barriers in Brookhust common area restrooms should remain included in demonstratives	Trial and Pretrial Preparation
11/25/2024	Jennifer Bybee	0.8	\$925	\$740	Review edits to SV common area barrier tables	Trial and Pretrial Preparation
11/25/2024	Jennifer Bybee	0.9	\$925	\$833	Finalize current round of edits to facility barrier table demonstratives	Trial and Pretrial Preparation
11/25/2024	Jennifer Bybee	0.6	\$925	\$555	Create list of barrier chart demonstratives; email same to trial team	Trial and Pretrial Preparation
11/25/2024	Jennifer Bybee	1.2	\$925	\$1,110	Zoom call with co-counsel and D. Murov re common area demonstratives	Trial and Pretrial Preparation
11/25/2024	Jennifer Bybee	1.7	\$925	\$1,573	Draft text of San Ramon Common Area Demonstratives	Trial and Pretrial Preparation
11/25/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re demonstratives	Trial and Pretrial Preparation
11/25/2024	Mark Johnson	0.2	\$1,150	\$230	review notice of mtn and declarations iso MILs, com w/ COC re same.	Other Motions
11/25/2024	Mark Johnson	0.5	\$1,150	\$575	final review and edit of MIL no. 3 re evidence of lack of intent; com w/ COC re same.	Other Motions
11/25/2024	Mark Johnson	0.9	\$1,150	\$1,035	call w/ OC re MILs and witness time estimates - GCG, BU, JY on the call	Trial and Pretrial Preparation
11/25/2024	Mark Johnson	0.1	\$1,150	\$115	call w/ GBW re meet and confer w/ OC	Trial and Pretrial Preparation
11/25/2024	Mark Johnson	0.7	\$1,150	\$805	zoom call w Sonia Chopra, Guy Wallace and Gay Grunfeld re voire dire.	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/25/2024	Mark Johnson	1.3	\$1,150	\$1,495	Zoom mtg w/ D Murov and COC Grunfeld, Close, Wallace, Bybee to review and discuss demonstratives.	Trial and Pretrial Preparation
11/25/2024	Mark Johnson	1.5	\$1,150	\$1,725	review Scotts Valley barrier report draft demonstratives and prepare chart/email identifying existing drafts, missing demonstratives and excluded demonstratives for common areas.	Trial and Pretrial Preparation
11/25/2024	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW re demonstratives, Rule 1006 summaries of barrier report data and approach to same	Trial and Pretrial Preparation
11/25/2024	Mark Johnson	0.2	\$1,150	\$230	review TCC memo / proposed insert to pre-trial statement re 1006 summary of evidence	Trial and Pretrial Preparation
11/25/2024	Mark Johnson	1.1	\$1,150	\$1,265	review proposed order on MIL; review and partial edit of draft joint pre-trial statement, com w/ COC	Trial and Pretrial Preparation
11/25/2024	Mark Johnson	0.5	\$1,150	\$575	email exchanges w/ GBW, TCC re 1006 summary of barrier reports, strategy / arguments re same, admissibility of reports, requirements of 1006.	Trial and Pretrial Preparation
11/25/2024	Mark Johnson	1.0	\$1,150	\$1,150	review SV common area demonstratives and SV barrier report, prepare list if existing, missing and common area barrier demonstratives, review photos selected by TCC for same.	Trial and Pretrial Preparation
11/25/2024	Rachel Steyer	0.7	\$750	\$525	reviewing draft pre-trial statement circulated by BBK	Trial and Pretrial Preparation
11/25/2024	Rachel Steyer	0.6	\$750	\$450	reviewing and editing draft MILs	Trial and Pretrial Preparation
11/25/2024	Rachel Steyer	2.9	\$750	\$2,175	reviewing and drafting model jury instructions	Trial and Pretrial Preparation
11/25/2024	Rachel Steyer	0.2	\$750	\$150	call with GBW checking in re preparing jury instructions	Trial and Pretrial Preparation
11/25/2024	Rachel Steyer	0.3	\$750	\$225	reviewing BSU MIL	Trial and Pretrial Preparation
11/25/2024	Rachel Steyer	0.2	\$750	\$150	reviewing proposed orders and sponsoring declarations accompanying MILs	Trial and Pretrial Preparation
11/25/2024	Rachel Steyer	0.4	\$750	\$300	reviewing exhibit list objections	Trial and Pretrial Preparation
11/25/2024	Travis Close	0.8	\$850	\$680	Review, analyze, and propose additional revisions to draft objections to Def's exhibit list	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/25/2024	Travis Close	0.3	\$850	\$255	Review and analyze sample demonstrative slides for common area barriers consultant	Trial and Pretrial Preparation
11/25/2024	Travis Close	0.2	\$850	\$170	Email to DM (consultant) re: proposed changes to photo identifiers in slides	Trial and Pretrial Preparation
11/25/2024	Travis Close	1.3	\$850	\$1,105	Review, analyze, propose revisions to Pltfs' joint pretrial statement	Trial and Pretrial Preparation
11/25/2024	Travis Close	0.2	\$850	\$170	Email to MTJ re: links to proposed demonstrative exhibits in our shared firm drive	Trial and Pretrial Preparation
11/25/2024	Travis Close	0.3	\$850	\$255	Email to MTJ re: questions to Jeff Mastin about inconsistencies in reports with 1985/1989 CBC	Trial and Pretrial Preparation
11/25/2024	Travis Close	0.3	\$850	\$255	Review and analyze judge's pretrial standing order re: presentation of exhibits/demonstratives	Trial and Pretrial Preparation
11/25/2024	Travis Close	0.7	\$850	\$595	Research & summarize critical distinctions between illustrative aids (Rule 107) vs Rule 1006 summaries	Trial and Pretrial Preparation
11/25/2024	Travis Close	0.3	\$850	\$255	Call with GBW re: intro/explainer needed for Rule 1006 summaries	Trial and Pretrial Preparation
11/25/2024	Travis Close	1.3	\$850	\$1,105	Meet with demonstratives subgroup re: status of common area barrier slides, next assignments	Trial and Pretrial Preparation
11/25/2024	Travis Close	1.8	\$850	\$1,530	Draft insert for pre-trial statement - Rule 1006 summaries	Trial and Pretrial Preparation
11/25/2024	Travis Close	1.4	\$850	\$1,190	Analyze & organize additional photos for supplemental barriers to include in San Ramon demonstrative slides/summaries	Trial and Pretrial Preparation
11/25/2024	Travis Close	1.2	\$850	\$1,020	Analyze & organize additional photos for supplemental barriers to include in Scotts Valley demonstrative slides/summaries	Trial and Pretrial Preparation
11/26/2024	Guy Wallace	3.6	\$1,350	\$4,860	preparation and drafting of jury instructions	Other Motions
11/26/2024	Guy Wallace	1.8	\$1,350	\$2,430	preparation and drafting of special verdict form; com's with MTJ; JAU re same (.5)	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/26/2024	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of draft joint pretrial statement; revise and edit same	Pleadings and Motions Re: Pleadings
11/26/2024	Guy Wallace	1.6	\$1,350	\$2,160	zoom with Murov; GG; MTJ; JAU; TCC re preparation of demonstratives, summaries and charts	Trial and Pretrial Preparation
11/26/2024	Guy Wallace	2.7	\$1,350	\$3,645	revise and edit draft of joint pretrial statement; revise and edit section re use of 1006 summaries	Trial and Pretrial Preparation
11/26/2024	Guy Wallace	2.4	\$1,350	\$3,240	review and analysis of draft demonstratives, summaries and charts re common areas and resident rooms; revisions thereto	Trial and Pretrial Preparation
11/26/2024	Guy Wallace	0.4	\$1,350	\$540	review and analysis of draft voir dire from National Jury Project	Trial and Pretrial Preparation
11/26/2024	Guy Wallace	0.4	\$1,350	\$540	review and analysis of draft Joint Neutral Statement and MTJ revisions thereto	Trial and Pretrial Preparation
11/26/2024	Guy Wallace	0.9	\$1,350	\$1,215	review of final drafts of demonstratives, summaries and charts; com's with Murov; MTJ; JAU; TCC re same	Trial and Pretrial Preparation
11/26/2024	Jennifer Bybee	0.2	\$925	\$185	Review emails with co-counsel and D. Murov re demonstratives	Trial and Pretrial Preparation
11/26/2024	Jennifer Bybee	0.4	\$925	\$370	Finalize text for San Ramon "intro" demonstratives and email to D. Murov	Trial and Pretrial Preparation
11/26/2024	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re jury instructions	Trial and Pretrial Preparation
11/26/2024	Jennifer Bybee	0.5	\$925	\$463	Finalize resident room and common area barrier charts and upload to shared server	Trial and Pretrial Preparation
11/26/2024	Jennifer Bybee	1.5	\$925	\$1,388	Zoom call with co-counsel and D. Murov re demonstratives	Trial and Pretrial Preparation
11/26/2024	Jennifer Bybee	1.2	\$925	\$1,110	Draft text for Brookhurst resident room intro demonstratives	Trial and Pretrial Preparation
11/26/2024	Jennifer Bybee	0.9	\$925	\$833	Draft text for Scotts Valley Resident Room intro slides	Trial and Pretrial Preparation
11/26/2024	Jennifer Bybee	0.2	\$925	\$185	Provide titles for San Ramon Common Area slides to D. Murov	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/26/2024	Jennifer Bybee	5.3	\$925	\$4,903	Finalize list of demonstratives and upload all to server	Trial and Pretrial Preparation
11/26/2024	Jennifer Bybee	0.2	\$925	\$185	Zoom meeting with J. Yelin and G. Grunfeld re demonstrative list	Trial and Pretrial Preparation
11/26/2024	Jennifer Bybee	0.4	\$925	\$370	Zoom call with D. Murov and co-counsel re demonstratives	Trial and Pretrial Preparation
11/26/2024	Jennifer Bybee	0.4	\$925	\$370	Zoom call with D. Murov and Co-counsel re demonstratives	Trial and Pretrial Preparation
11/26/2024	Jennifer Bybee	0.6	\$925	\$555	Zoom call with co-counsel and D. Murov re demonstratives	Trial and Pretrial Preparation
11/26/2024	Mark Johnson	1.4	\$1,150	\$1,610	Zoom meeting re demonstratives w/ Murov, Close, Bybee, Grunfeld, Wallace. review slides and identify missing text, photos or slides.	Trial and Pretrial Preparation
11/26/2024	Mark Johnson	0.3	\$1,150	\$345	Zoom w/ GBW, GCG re response to Bertino memo re CBC coverage	Trial and Pretrial Preparation
11/26/2024	Mark Johnson	1.0	\$1,150	\$1,150	further review and edit of proposed joint pre-trial statement	Trial and Pretrial Preparation
11/26/2024	Mark Johnson	0.7	\$1,150	\$805	follow up call w/ Murov, Close, Wallace and Bybee re demonstratives	Trial and Pretrial Preparation
11/26/2024	Mark Johnson	0.3	\$1,150	\$345	review and edit draft neutral statement; com w/ COC re same.	Trial and Pretrial Preparation
11/26/2024	Mark Johnson	0.5	\$1,150	\$575	coms w/ JAU re text for demonstratives for San Ramon room barriers; prepare same and coms w/ D Murov re same.	Trial and Pretrial Preparation
11/26/2024	Mark Johnson	0.4	\$1,150	\$460	review expert analysis and comment on text for barriers at Scotts Valley for demonstratives; coms w GBW and other COC re same.	Trial and Pretrial Preparation
11/26/2024	Mark Johnson	0.8	\$1,150	\$920	Final zoom re demonstratives to review new slides and identify needed edits, deletions w/ Murov, Bybee, Close and Wallace	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/26/2024	Mark Johnson	5.9	\$1,150	\$6,785	Work on demonstratives, looking up CBC standards, review / proof final slides, coms w/ JAU and GBW re same, coms re other docs to be exchanged.	Trial and Pretrial Preparation
11/26/2024	Rachel Steyer	5.4	\$750	\$4,050	working on updating and preparing separate exhibit A barriers spreadsheet for Hemet/Tracy/Fountaingrove facilities, adding in photos and barrier numbers	Trial and Pretrial Preparation
11/26/2024	Rachel Steyer	0.2	\$750	\$150	reviewing GBW proposed edits to pre-trial statement	Trial and Pretrial Preparation
11/26/2024	Rachel Steyer	0.5	\$750	\$375	reviewing defendants' MILs	Trial and Pretrial Preparation
11/26/2024	Rachel Steyer	0.3	\$750	\$225	reviewing defendants' objections to exhibit list	Trial and Pretrial Preparation
11/26/2024	Rachel Steyer	0.3	\$750	\$225	reviewing defendants' demonstratives	Trial and Pretrial Preparation
11/26/2024	Travis Close	0.3	\$850	\$255	Review and analyze draft MIL re: evidence of intent to discriminate	Trial and Pretrial Preparation
11/26/2024	Travis Close	0.5	\$850	\$425	Review, analyze, propose revisions to updated demonstrative slides by consultant - resident rooms - Brookhurst, Scotts Valley, San Ramon	Trial and Pretrial Preparation
11/26/2024	Travis Close	0.2	\$850	\$170	Review and analyze master list of demonstratives for sufficiency; check against notes	Trial and Pretrial Preparation
11/26/2024	Travis Close	1.5	\$850	\$1,275	Meeting with demonstratives sub-group and DM (consultant) re: progress on slides and additional content needed	Trial and Pretrial Preparation
11/26/2024	Travis Close	1.1	\$850	\$935	Analyze photos for room barrier categories to supplement for slides - Brookhurst	Trial and Pretrial Preparation
11/26/2024	Travis Close	1.1	\$850	\$935	Analyze photos for room barrier categories to supplement for demonstrative slides - Scotts Valley	Trial and Pretrial Preparation
11/26/2024	Travis Close	1.1	\$850	\$935	Analyze photos for room barrier categories to supplement for demonstrative slides - San Ramon	Trial and Pretrial Preparation
11/26/2024	Travis Close	1.0	\$850	\$850	Count common area & room barriers for the three facilities and input results by barrier type into spreadsheet	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/26/2024	Travis Close	0.5	\$850	\$425	Review and analyze latest draft of joint pretrial statement with inset re: Rule 1006 summaries and additions from MTJ, GBW	Trial and Pretrial Preparation
11/26/2024	Travis Close	0.3	\$850	\$255	Review and analyze comments by JM (expert) on proposed language/photos for access barrier demonstratives	Trial and Pretrial Preparation
11/26/2024	Travis Close	0.7	\$850	\$595	Meeting with GBW, MTJ, JUB, and DM (consultant) further progress on demonstrative slides before deadlines	Trial and Pretrial Preparation
11/26/2024	Travis Close	0.6	\$850	\$510	Further meeting with MTJ, GBW, JUB and DM (consultant) re: update on progress of demonstrative slides	Trial and Pretrial Preparation
11/26/2024	Travis Close	0.4	\$850	\$340	Review and analyze defendants' motions in limine	Trial and Pretrial Preparation
11/26/2024	Travis Close	0.8	\$850	\$680	Final meeting with MTJ, GBW, JUB and consultant re: finalizing demonstrative slides	Trial and Pretrial Preparation
11/26/2024	Travis Close	0.9	\$850	\$765	Finalization of demonstratives; QA of all slides, upload to FTP link and send to Defendants' counsel	Trial and Pretrial Preparation
11/27/2024	Guy Wallace	4.8	\$1,350	\$6,480	preparation and drafting of special jury instructions and verdict form	Trial and Pretrial Preparation
11/27/2024	Guy Wallace	2.6	\$1,350	\$3,510	revise and edit draft special verdict form; com's with MTJ; RLS re same (.8)	Trial and Pretrial Preparation
11/27/2024	Guy Wallace	4.8	\$1,350	\$6,480	preparation and drafting of jury instructions; revise and edit same; com's with MTJ; JAU; TCC re same (1.7)	Trial and Pretrial Preparation
11/27/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re jury instructions	Trial and Pretrial Preparation
11/27/2024	Jennifer Bybee	0.8	\$925	\$740	Teams call with GBW, TCC and MTJ re jury instructions	Trial and Pretrial Preparation
11/27/2024	Jennifer Bybee	2.4	\$925	\$2,220	Draft proposed special jury instructions for ADAAG violations at Brookhurst	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/27/2024	Mark Johnson	0.7	\$1,150	\$805	video conference call w/ GBW, TCC, JAU re preparation of jury instructions for CBC violations, approach and assignment re same	Trial and Pretrial Preparation
11/27/2024	Mark Johnson	0.3	\$1,150	\$345	participate in part of Zoom call w/ TCC and RBGG team members re pre-trial tasks	Trial and Pretrial Preparation
11/27/2024	Mark Johnson	0.8	\$1,150	\$920	calls w/ GBW and review emails re possible waiver of jury, pros and cons of jury v. Bench trials, impact of request for waiver	Trial and Pretrial Preparation
11/27/2024	Mark Johnson	1.2	\$1,150	\$1,380	multiple calls and emails w GBW re special jury instructions, review draft of ADAAG instructions and others	Trial and Pretrial Preparation
11/27/2024	Mark Johnson	3.8	\$1,150	\$4,370	prepare list of needed CBC jury instructions for 1985, 1989 and 1998 CBC; review Scotts Valley Report and 1985 CBC and draft jury instructions for relevant 85 CBC code sections; draft jury instruction for Unruh Act standard for intent	Trial and Pretrial Preparation
11/27/2024	Rachel Steyer	0.2	\$750	\$150	call with GBW re preparing barrier chart summaries for special verdict forms	Trial and Pretrial Preparation
11/27/2024	Rachel Steyer	0.2	\$750	\$150	call with GBW to discuss preparing common barrier chart for special verdict form	Trial and Pretrial Preparation
11/27/2024	Rachel Steyer	1.1	\$750	\$825	preparing special verdict common barriers chart	Trial and Pretrial Preparation
11/27/2024	Rachel Steyer	0.4	\$750	\$300	meeting with RBGG, TCC, MTJ, BSU to review and discuss assignments and tasks	Trial and Pretrial Preparation
11/27/2024	Travis Close	0.2	\$850	\$170	Email to team setting up meeting for today to discuss demonstratives	Trial and Pretrial Preparation
11/27/2024	Travis Close	1.1	\$850	\$935	Review and analyze defendants' set of demonstratives	Trial and Pretrial Preparation
11/27/2024	Travis Close	0.8	\$850	\$680	Review and analyze proposed special jury instructions/form	Trial and Pretrial Preparation
11/27/2024	Travis Close	0.2	\$850	\$170	Call with GG re: errors in yesterday's disclosure of our summaries and demonstratives	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/27/2024	Travis Close	0.0	\$850	\$0	Meeting re: dividing up assignments for jury instructions	Trial and Pretrial Preparation
11/27/2024	Travis Close	0.6	\$850	\$510	Additions/revisions to jury instructions re: Fleet safety policy	Trial and Pretrial Preparation
11/27/2024	Travis Close	0.8	\$850	\$680	Draft jury instructions for 1998 CBC	Trial and Pretrial Preparation
11/27/2024	Travis Close	0.5	\$850	\$425	Team meeting re: next pre-trial assignments, jury instructions, response to Def's objections to our exhibits	Trial and Pretrial Preparation
11/27/2024	Travis Close	3.9	\$850	\$3,315	Draft jury instructions for 1989 CBC	Trial and Pretrial Preparation
11/27/2024	Travis Close	0.7	\$850	\$595	Further revisions to draft special jury instructions	Trial and Pretrial Preparation
11/28/2024	Mark Johnson	0.7	\$1,150	\$805	review pre-trial submissions from Ds	Trial and Pretrial Preparation
11/28/2024	Mark Johnson	0.1	\$1,150	\$115	review email exchanges re trial by jury v bench w/ Stebner, Wallace	Trial and Pretrial Preparation
11/29/2024	Guy Wallace	2.1	\$1,350	\$2,835	review and analysis of draft jury instructions; revise and edit same	Trial and Pretrial Preparation
11/29/2024	Guy Wallace	1.9	\$1,350	\$2,565	review and analysis of Defendants' demonstratives; draft jury instructions; special verdict form; legal research and analysis re same	Trial and Pretrial Preparation
11/29/2024	Guy Wallace	0.7	\$1,350	\$945	review and analysis of Court's Order re trial time estimate; legal research and analysis re same	Trial and Pretrial Preparation
11/29/2024	Guy Wallace	0.6	\$1,350	\$810	com's with GG; JY; KAS; BU; MTJ re GG's proposal re waiver of jury for first trial	Trial and Pretrial Preparation
11/29/2024	Guy Wallace	0.6	\$1,350	\$810	review and analysis of Defendants' proposed instructions re intent; further legal research and analysis re same; review and analysis of Court's pretrial preparation order	Trial and Pretrial Preparation
11/29/2024	Rachel Steyer	1.1	\$750	\$825	research into more recent special jury instructions re deliberate ignorance	Trial and Pretrial Preparation
11/29/2024	Travis Close	1.6	\$850	\$1,360	Legal research in treatises and ninth circuit case law on hearsay and exceptions thereto	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
11/29/2024	Travis Close	1.8	\$850	\$1,530	Legal research on updated citations for jury instructions re: willful conduct and "good faith belief" defense	Trial and Pretrial Preparation
11/30/2024	Guy Wallace	1.6	\$1,350	\$2,160	review and analysis of Defendants' proposed jury instructions; com's with MTJ; TCC; RLS re same (.5)	Trial and Pretrial Preparation
11/30/2024	Guy Wallace	0.5	\$1,350	\$675	review and analysis of GG draft objections to Defendants' demonstratives; com's with MTJ re same	Trial and Pretrial Preparation
11/30/2024	Guy Wallace	0.2	\$1,350	\$270	com's with RLS re draft jury instructions	Trial and Pretrial Preparation
11/30/2024	Mark Johnson	0.2	\$1,150	\$230	call w S Stiner and R Stiner re status of trial preparation and pre-trial developments, waiver of jury trial.	Trial and Pretrial Preparation
11/30/2024	Mark Johnson	0.8	\$1,150	\$920	calls w GBW re preparing objections to defendants' demonstratives and jury instructions and verdict form, other tasks for meet and confer and December 3 pre-trial submissions. oppositions to motion in limine.	Trial and Pretrial Preparation
11/30/2024	Mark Johnson	0.5	\$1,150	\$575	further calls (x3) w/ GBW re pre-trial filings, objections to defendants' filings, waiver of jury trial	Trial and Pretrial Preparation
11/30/2024	Mark Johnson	1.8	\$1,150	\$2,070	review D jury instructions and demonstratives, begin working on objections/oppositions to jury instructions; review own demonstratives for errata,	Trial and Pretrial Preparation
11/30/2024	Mark Johnson	0.2	\$1,150	\$230	review emails and attachments from GCG re objections to demonstratives and from RAB re Relativity searches for Raymond Leisure and Steven Paquette	Trial and Pretrial Preparation
11/30/2024	Rachel Steyer	3.1	\$750	\$2,325	additional research into deliberate ignorance jury instruction	Trial and Pretrial Preparation
11/30/2024	Rachel Steyer	0.2	\$750	\$150	response to JSY re trial witnesses who need to testify remotely	Trial and Pretrial Preparation
11/30/2024	Rachel Steyer	0.2	\$750	\$150	email to GBW, MTJ, TCC, JUB transmitting additional jury instruction authorities	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/1/2024	Guy Wallace	4.1	\$1,350	\$5,535	preparation and drafting of responses to Defendants' proposed jury instructions; legal research and analysis re same	Trial and Pretrial Preparation
12/1/2024	Guy Wallace	3.6	\$1,350	\$4,860	preparation and drafting of response to Defendants' proposed jury instructions; review and analysis of proposed responses from MTJ; TCC; revise and edit same	Trial and Pretrial Preparation
12/1/2024	Guy Wallace	3.3	\$1,350	\$4,455	preparation and drafting of responses re disputed instructions; including instructions re elements of an ADA claim; intent under the Unruh Act; equivalent facilitation	Trial and Pretrial Preparation
12/1/2024	Jennifer Bybee	1.6	\$925	\$1,480	Create redline edits to Brookhurst demonstratives	Trial and Pretrial Preparation
12/1/2024	Jennifer Bybee	0.2	\$925	\$185	Review "general" and "transportation" sections of demonstratives for accuracy	Trial and Pretrial Preparation
12/1/2024	Jennifer Bybee	0.7	\$925	\$648	Review San Ramon demonstratives and create any necessary redline edits	Trial and Pretrial Preparation
12/1/2024	Mark Johnson	0.6	\$1,150	\$690	call w/ GBW re issues related to jury instructions and statements re disputed instructions, issues of law or fact.	Trial and Pretrial Preparation
12/1/2024	Mark Johnson	0.7	\$1,150	\$805	review and analysis of D's edits to pre-trial statement, email coms w/ COC re same	Trial and Pretrial Preparation
12/1/2024	Mark Johnson	0.2	\$1,150	\$230	review statement re jury trial for insert to pre-trial statement, com w/ GBW re same.	Trial and Pretrial Preparation
12/1/2024	Mark Johnson	4.5	\$1,150	\$5,175	work on objections/responses to Jury Instructions, review template and other examples re same and coms w/ GBW re same.	Trial and Pretrial Preparation
12/1/2024	Rachel Steyer	0.4	\$750	\$300	zoom with JSY, MEC, BM, TCC re dividing up assignments for responses to defendants' objections to exhibit list	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/1/2024	Rachel Steyer	0.3	\$750	\$225	additional research into deliberate ignorance jury instruction standard	Trial and Pretrial Preparation
12/1/2024	Rachel Steyer	2.4	\$750	\$1,800	going through and preparing/drafting responses to defendants' objections to exhibit list	Trial and Pretrial Preparation
12/1/2024	Travis Close	0.6	\$850	\$510	Meet with JY, RLS, MC, BM re: responding to def's objections	Trial and Pretrial Preparation
12/1/2024	Travis Close	1.4	\$850	\$1,190	Create chart comparing Def's vs. Pltf's jury instructions	Trial and Pretrial Preparation
12/1/2024	Travis Close	1.2	\$850	\$1,020	Review, analyze, propose objections to Defendants' jury instructions	Trial and Pretrial Preparation
12/1/2024	Travis Close	0.6	\$850	\$510	Meet with GBW re: dividing assignments for jury instruction	Trial and Pretrial Preparation
12/1/2024	Travis Close	1.4	\$850	\$1,190	Draft proposed statement re: disputed jury instruction on ADAAG barriers	Trial and Pretrial Preparation
12/1/2024	Travis Close	1.6	\$850	\$1,360	Draft proposed statement re: 37.165(e), disputed jury instruction	Trial and Pretrial Preparation
12/2/2024	Guy Wallace	1.2	\$1,350	\$1,620	preparation and drafting of responses re disputed jury instructions	Trial and Pretrial Preparation
12/2/2024	Guy Wallace	2.8	\$1,350	\$3,780	preparation of responses re disputed instructions	Trial and Pretrial Preparation
12/2/2024	Guy Wallace	0.9	\$1,350	\$1,215	com's with MTJ; TCC re preparation of revised jury instructions; responses to Defendants' proposed jury instructions	Trial and Pretrial Preparation
12/2/2024	Guy Wallace	1.4	\$1,350	\$1,890	review and analysis of draft of joint pretrial statement; revise and edit same	Trial and Pretrial Preparation
12/2/2024	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of draft joint neutral statement of case; revise and edit same	Trial and Pretrial Preparation
12/2/2024	Guy Wallace	1.3	\$1,350	\$1,755	zoom with ER; JB; Jacobsen; GG; JY; BBK; MTJ re preparation of pretrial submissions	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/2/2024	Guy Wallace	1.6	\$1,350	\$2,160	review and analysis of revised versions of certain demonstratives, summaries and charts; com's with JAU re same (.5)	Trial and Pretrial Preparation
12/2/2024	Guy Wallace	1.6	\$1,350	\$2,160	zoom with ER; Bertino; Jacobsen; GG; JY; MTJ re jury instructions; verdict form; follow-up com's re same and schedule on same and proposed stipulation and order	Trial and Pretrial Preparation
12/2/2024	Guy Wallace	0.6	\$1,350	\$810	review and analysis of draft MIL oppositions re FSP; supplemental reports of Mastin and Waters	Trial and Pretrial Preparation
12/2/2024	Jennifer Bybee	1.1	\$925	\$1,018	Finish redline edits to demonstratives and send to D. Murov	Trial and Pretrial Preparation
12/2/2024	Jennifer Bybee	0.7	\$925	\$648	Create list of what has changed to demonstratives	Trial and Pretrial Preparation
12/2/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with J. Mastin re barriers at Scotts Valley	Trial and Pretrial Preparation
12/2/2024	Jennifer Bybee	0.5	\$925	\$463	Create new demonstrative text and pull photos for same	Trial and Pretrial Preparation
12/2/2024	Jennifer Bybee	0.3	\$925	\$278	Finalize and send updated demonstratives	Trial and Pretrial Preparation
12/2/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with J. Yelin re edits to demonstratives	Trial and Pretrial Preparation
12/2/2024	Mark Johnson	1.2	\$1,150	\$1,380	meet and confer zoom w OC Rutner, Jacobsen, Bertino and Moore and COC Wallace, Grunfeld, Bien-Kahn and Yelin re joint pre-trial statement, neutral statement of case, jury instructions and other pre-trial filings	Trial and Pretrial Preparation
12/2/2024	Mark Johnson	0.6	\$1,150	\$690	follow up call w/ GBW re jury instructions, pretrial statement, stip re photos, question from Ds re barriers	Trial and Pretrial Preparation
12/2/2024	Mark Johnson	1.0	\$1,150	\$1,150	meet and confer w/ OC re jury instructions, stipulation to defer filing of certain docs.	Trial and Pretrial Preparation
12/2/2024	Mark Johnson	2.4	\$1,150	\$2,760	review and edit revised draft pre-trial statement, email coms w/ COC re same	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/2/2024	Mark Johnson	0.8	\$1,150	\$920	review email from COC re D objections to demonstratives, research ADAAG provisions and CBC sections re same; draft email to COC re analysis	Trial and Pretrial Preparation
12/2/2024	Mark Johnson	0.3	\$1,150	\$345	review draft trial brief and email COC with thoughts about same.	Trial and Pretrial Preparation
12/2/2024	Mark Johnson	0.7	\$1,150	\$805	review and revise draft stipulation re extension of time for certain pre-trial submissions; review and incorporate edits from COC and OC for filing.	Trial and Pretrial Preparation
12/2/2024	Mark Johnson	2.0	\$1,150	\$2,300	work on revising jury instructions and preparing statements in opposition to Defendants' jury instructions.	Trial and Pretrial Preparation
12/2/2024	Mark Johnson	0.3	\$1,150	\$345	review and edit draft proposed neutral statement of the case	Trial and Pretrial Preparation
12/2/2024	Mark Johnson	1.3	\$1,150	\$1,495	calls w/ GBW re jury instructions, responses to Ds jury instructions, pretrial statement, trial strategy and strength of arguments,	Trial and Pretrial Preparation
12/2/2024	Rachel Steyer	0.3	\$750	\$225	reviewing responses to depo designation objections	Trial and Pretrial Preparation
12/2/2024	Rachel Steyer	0.4	\$750	\$300	reviewing documents corresponding to witnesses, responding to MEC and JSY re additional details re witnesses requesting zoom testimony	Trial and Pretrial Preparation
12/2/2024	Rachel Steyer	0.2	\$750	\$150	reviewing opposition to MIL re FSP	Trial and Pretrial Preparation
12/2/2024	Rachel Steyer	0.3	\$750	\$225	follow up call with Robert Phipps to review and confirm testimony at trial	Trial and Pretrial Preparation
12/2/2024	Rachel Steyer	0.5	\$750	\$375	reviewing plaintiffs' objections to defendants' demonstratives	Trial and Pretrial Preparation
12/2/2024	Rachel Steyer	0.5	\$750	\$375	reviewing defendants' objections to plaintiffs' demonstratives	Trial and Pretrial Preparation
12/2/2024	Rachel Steyer	0.3	\$750	\$225	reviewing updated version of plaintiffs' responses to defendants objections to exhibit list	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/2/2024	Rachel Steyer	0.5	\$750	\$375	reviewing internal notes and defendants edits to trial statement	Trial and Pretrial Preparation
12/2/2024	Rachel Steyer	0.6	\$750	\$450	reviewing defendants' proposed jury instructions, voir dire questionnaire, verdict forms	Trial and Pretrial Preparation
12/2/2024	Travis Close	0.9	\$850	\$765	Compile supplemental common area barrier photos for Scotts Valley	Trial and Pretrial Preparation
12/2/2024	Travis Close	1.3	\$850	\$1,105	Draft summary of disputed jury instruction re: direct threat defense	Trial and Pretrial Preparation
12/2/2024	Travis Close	0.2	\$850	\$170	Call to GBW re: assistance with drafting direct threat disputed instruction summary	Trial and Pretrial Preparation
12/2/2024	Travis Close	1.0	\$850	\$850	Draft statement re: disputed jury instruction - Equivalent Service Standards	Trial and Pretrial Preparation
12/2/2024	Travis Close	1.3	\$850	\$1,105	Draft statement re disputed instruction - mootness	Trial and Pretrial Preparation
12/2/2024	Travis Close	0.6	\$850	\$510	Legal research re: propriety of including questions of law in jury instructions	Trial and Pretrial Preparation
12/2/2024	Travis Close	0.5	\$850	\$425	Legal research re: proper statement of the mootness doctrine	Trial and Pretrial Preparation
12/2/2024	Travis Close	1.1	\$850	\$935	Draft proposed stip and order re: extension of time to submit jury instructions	Trial and Pretrial Preparation
12/2/2024	Travis Close	0.2	\$850	\$170	Call to GBW re: extension of time needed for jury instructions submission	Trial and Pretrial Preparation
12/3/2024	Guy Wallace	0.4	\$1,350	\$540	review and analysis of settlement proposal from Goodwin	Settlement
12/3/2024	Guy Wallace	3.3	\$1,350	\$4,455	review and analysis of multiple drafts of joint pretrial statement; revise and edit same; com's with GG; JY; MTJ re same 1.6	Trial and Pretrial Preparation
12/3/2024	Guy Wallace	1.3	\$1,350	\$1,755	zoom with Rutner; Bertino; Jacobsen; GG; JY; MTJ re jury instructions; joint pretrial statement; special verdict form; voir dire	Trial and Pretrial Preparation
12/3/2024	Guy Wallace	0.4	\$1,350	\$540	revise and edit Plaintiffs' special verdict form	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/3/2024	Guy Wallace	0.9	\$1,350	\$1,215	com's with Waters re 1985 CBC and application to Scotts Valley facility	Trial and Pretrial Preparation
12/3/2024	Guy Wallace	0.5	\$1,350	\$675	com's with BU re opposition to Defendants' MIL re Waters and Mastin supplemental reports	Trial and Pretrial Preparation
12/3/2024	Guy Wallace	3.3	\$1,350	\$4,455	preparation and drafting of additional jury instructions; revised jury instructions; email to Defendants re same (.1)	Trial and Pretrial Preparation
12/3/2024	Guy Wallace	1.4	\$1,350	\$1,890	preparation and drafting of response re Defendants' proposed jury instruction re due process defense	Trial and Pretrial Preparation
12/3/2024	Guy Wallace	0.7	\$1,350	\$945	zoom with GG; JY; MEC; MTJ re motion for bench trial	Trial and Pretrial Preparation
12/3/2024	Guy Wallace	0.6	\$1,350	\$810	review and analysis of further drafts of Joint Neutral Statement; com's with GG; JY; MTJ re same	Trial and Pretrial Preparation
12/3/2024	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of draft responses to Defendants' proposed instructions re mootness; direct threat; intentionality	Trial and Pretrial Preparation
12/3/2024	Mark Johnson	1.2	\$1,150	\$1,380	zoom meet and confer w/ OC Rutner, Bertino, Jacobsen, w/ Wallace, Grunfeld, Yelin re pretrial filings.	Trial and Pretrial Preparation
12/3/2024	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW following meet and confer re verdict form and jury trial waiver strategy.	Trial and Pretrial Preparation
12/3/2024	Mark Johnson	0.6	\$1,150	\$690	zoom call w/ Grunfeld, Yellin, Campbell, Wallace re waiver of Jury, mtn to try case to the Court.	Trial and Pretrial Preparation
12/3/2024	Mark Johnson	0.5	\$1,150	\$575	call w/ GBW re jury trial / bench trial strategy, pre-trial statement, verdict form issues and additions.	Trial and Pretrial Preparation
12/3/2024	Mark Johnson	0.4	\$1,150	\$460	further zoom with Wallace, Grunfeld, Yelin re new revisions to joint pre-trial statement	Trial and Pretrial Preparation
12/3/2024	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re revised / new jury instructions and cover email to OC re same.	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/3/2024	Mark Johnson	0.5	\$1,150	\$575	call and zoom w/ GBW and TCC re revisions to willful misconduct instruction and authority for same.	Trial and Pretrial Preparation
12/3/2024	Mark Johnson	0.2	\$1,150	\$230	call w/ GBW re instruction re willfulness	Trial and Pretrial Preparation
12/3/2024	Mark Johnson	2.0	\$1,150	\$2,300	draft new special jury instruction re public accommodations; coms w/ GBW re same	Trial and Pretrial Preparation
12/3/2024	Mark Johnson	0.4	\$1,150	\$460	review trial brief	Trial and Pretrial Preparation
12/3/2024	Mark Johnson	1.9	\$1,150	\$2,185	draft new jury instruction re claims and defenses; review other docs for same; coms w/ GBW re same.	Trial and Pretrial Preparation
12/3/2024	Mark Johnson	1.8	\$1,150	\$2,070	review multiple versions of pre-trial statement and neutral joint statement of the case, propose edits re same, coms w/ OC Wallace, Grunfeld and Yelin re same	Trial and Pretrial Preparation
12/3/2024	Mark Johnson	0.2	\$1,150	\$230	coms w/ J Yelin re responses to objections to demonstratives	Trial and Pretrial Preparation
12/3/2024	Rachel Steyer	0.2	\$750	\$150	reviewing and editing draft email from GBW to OC summarizing status of disputed jury instructions	Communications With Opposing Counsel
12/3/2024	Rachel Steyer	0.3	\$750	\$225	organizing and gathering all draft objections to defendants' jury instructions	Trial and Pretrial Preparation
12/3/2024	Rachel Steyer	2.5	\$750	\$1,875	preparing chart/spreadsheet analyzing and comparing parties' jury instructions	Trial and Pretrial Preparation
12/3/2024	Rachel Steyer	0.2	\$750	\$150	reviewing revised draft objection to defendants' jury instruction re direct threat	Trial and Pretrial Preparation
12/3/2024	Rachel Steyer	0.3	\$750	\$225	reviewing exhibit A, identifying relevant barriers	Trial and Pretrial Preparation
12/3/2024	Rachel Steyer	0.2	\$750	\$150	reviewing draft alternative jury instruction re plaintiffs' claims and defenses	Trial and Pretrial Preparation
12/3/2024	Rachel Steyer	0.2	\$750	\$150	reviewing plaintiffs' MIL opposition re 2017 letters	Trial and Pretrial Preparation
12/3/2024	Rachel Steyer	0.2	\$750	\$150	reviewing plaintiffs' MIL opposition re supplemental Mastin and Waters reports	Trial and Pretrial Preparation
12/3/2024	Rachel Steyer	0.2	\$750	\$150	reviewing red line edits circulated by JSY in neutral statement of the case	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/3/2024	Rachel Steyer	0.8	\$750	\$600	reviewing defendants' oppositions to MILs	Trial and Pretrial Preparation
12/3/2024	Travis Close	0.3	\$850	\$255	Call with GBW re: outline for today's assignments re: jury instructions & statements in support thereof	Trial and Pretrial Preparation
12/3/2024	Travis Close	1.4	\$850	\$1,190	Draft proposed jury instructions re direct threat; revise statement in support of direct threat instruction	Trial and Pretrial Preparation
12/3/2024	Travis Close	0.8	\$850	\$680	Research 9th circuit authorities re: factors for distinguishing questions of law vs. mixed questions of law and fact	Trial and Pretrial Preparation
12/3/2024	Travis Close	1.5	\$850	\$1,275	Draft proposed alternate jury instruction & revised statement re: "reasonably expected to recur" (mootness).	Trial and Pretrial Preparation
12/3/2024	Travis Close	1.3	\$850	\$1,105	Revise jury instruction & draft proposed statement re: deliberate ignorance	Trial and Pretrial Preparation
12/3/2024	Travis Close	2.2	\$850	\$1,870	Draft jury instructiond & draft proposed statement re: willful misconduct	Trial and Pretrial Preparation
12/3/2024	Travis Close	0.2	\$850	\$170	Call with GBW re: deliberate ignorance & willful misconduct jury instructions	Trial and Pretrial Preparation
12/3/2024	Travis Close	1.6	\$850	\$1,360	Legal research on what constitutes intentional discrimination under the Unruh Act	Trial and Pretrial Preparation
12/4/2024	Guy Wallace	0.6	\$1,350	\$810	com's with Waters re Brookdale Scotts Valley and 1985 CBC, R.2 occupancy	Trial and Pretrial Preparation
12/4/2024	Guy Wallace	2.8	\$1,350	\$3,780	revise and edit draft special verdict form; com's with RLS re same (.3)	Trial and Pretrial Preparation
12/4/2024	Guy Wallace	1.2	\$1,350	\$1,620	review and analysis of one page statements re special instructions; com's with MTJ re same	Trial and Pretrial Preparation
12/4/2024	Guy Wallace	4.4	\$1,350	\$5,940	revise and edit further versions of one page statements re disputed jury instructions	Trial and Pretrial Preparation
12/4/2024	Guy Wallace	0.6	\$1,350	\$810	zoom with GG; BM; AS: MJ re jury instructions; statements re jury instructions; voir dire	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/4/2024	Guy Wallace	0.5	\$1,350	\$675	review and analysis of proposed edits to voir dire; com's with GG re same	Trial and Pretrial Preparation
12/4/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with RLS re demonstratives	Trial and Pretrial Preparation
12/4/2024	Mark Johnson	0.3	\$1,150	\$345	Call w/ GBW re remaining tasks for instructions, one page response to instructions	Trial and Pretrial Preparation
12/4/2024	Rachel Steyer	0.2	\$750	\$150	updating jury instruction/objection analysis chart	Trial and Pretrial Preparation
12/4/2024	Rachel Steyer	0.2	\$750	\$150	call with GBW re preparing charts fo San Ramon and Scotts Valley for special verdict form	Trial and Pretrial Preparation
12/4/2024	Rachel Steyer	4.0	\$750	\$3,000	preparing common barrier charts for special verdict form for San Ramon and Scotts Valley	Trial and Pretrial Preparation
12/4/2024	Rachel Steyer	0.5	\$750	\$375	call with Wendy DeMello to discuss case status and trial prep update	Trial and Pretrial Preparation
12/4/2024	Rachel Steyer	0.3	\$750	\$225	reviewing internal RBGG edits to draft jury instructions and objections	Trial and Pretrial Preparation
12/4/2024	Travis Close	1.6	\$850	\$1,360	Revise proposed instruction, find statutory and case support for "Issuance of a Permit or Approval of Plans Does Not Constitute Permission to Violate Title 24	Trial and Pretrial Preparation
12/4/2024	Travis Close	1.4	\$850	\$1,190	Draft statement in support of proposed instruction for "Issuance of a Permit or Approval of Plans Does Not Constitute Permission to Violate Title 24	Trial and Pretrial Preparation
12/4/2024	Travis Close	1.0	\$850	\$850	Review and analyze Defendants' oppositions to Plaintiffs' MILs 1-5	Trial and Pretrial Preparation
12/4/2024	Travis Close	1.5	\$850	\$1,275	Revise proposed instruction, find statutory and case support for "good faith belief"	Trial and Pretrial Preparation
12/4/2024	Travis Close	1.2	\$850	\$1,020	Draft statement in support of revised jury instruction re "good faith belief"	Trial and Pretrial Preparation
12/5/2024	Guy Wallace	0.9	\$1,350	\$1,215	revise and edit statement re disputed jury instructions re place of public accommodation	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/5/2024	Guy Wallace	2.1	\$1,350	\$2,835	review and analysis of Defendants' proposed special verdict form; legal research and analysis of requirements for special verdict forms	Trial and Pretrial Preparation
12/5/2024	Guy Wallace	1.8	\$1,350	\$2,430	preparation of statement re Defendants' proposed instruction re disputed barriers under the ADA and the CBC	Trial and Pretrial Preparation
12/5/2024	Guy Wallace	0.9	\$1,350	\$1,215	meet and confer com's with Defendants' counsel re jury instructions, special verdict form, voir dire	Trial and Pretrial Preparation
12/5/2024	Guy Wallace	1.9	\$1,350	\$2,565	preparation and drafting of Plaintiffs' statements re disputed jury instructions; revise and edit same	Trial and Pretrial Preparation
12/5/2024	Guy Wallace	2.3	\$1,350	\$3,105	review and analysis of Defendants' proposed special verdict form; preparation of responsive arguments and points re same	Trial and Pretrial Preparation
12/5/2024	Guy Wallace	0.8	\$1,350	\$1,080	com's with Waters; MTJ re application of 1989 CBC and 1985 CBC; 1991 ADAAG	Trial and Pretrial Preparation
12/5/2024	Guy Wallace	1.8	\$1,350	\$2,430	preparation and drafting of one page statement re Plaintiffs' special verdict form; revise and edit same	Trial and Pretrial Preparation
12/5/2024	Guy Wallace	1.9	\$1,350	\$2,565	revise and edit further statements re disputed jury instructions including additional disputed items raised by Defendants; com's with GG; JY; MTJ; TCC re same	Trial and Pretrial Preparation
12/5/2024	Mark Johnson	1.0	\$1,150	\$1,150	call w/ mulitple OC re jury instruction reconciliation and disputes, verdict form, other issues; joined by Grunfeld, Wallace, Yelin, Umpierre, Munoz	Trial and Pretrial Preparation
12/5/2024	Mark Johnson	0.5	\$1,150	\$575	zoom w/ COC Grunfeld, Wallace, Yelin, Munoz, Umpierre re Disputed instructions and assignment of one page responses re same.	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/5/2024	Mark Johnson	9.5	\$1,150	\$10,925	draft, review revise proposed jury instructions and on page statements in support of instructions and opposition to Ds instructions, multiple calls, additional zoom meetings w/ COC re same, review and analyze code sections for same, review jury verdict form, review statement re trial times.	Trial and Pretrial Preparation
12/5/2024	Rachel Steyer	1.1	\$750	\$825	reviewing master draft/competing proposed jury instructions and objections	Trial and Pretrial Preparation
12/5/2024	Rachel Steyer	0.2	\$750	\$150	reviewing draft statement re disputed instruction re 1985 CBC doors/heights	Trial and Pretrial Preparation
12/5/2024	Rachel Steyer	0.2	\$750	\$150	reviewing draft instruction re 1989 CBC bathrooms	Trial and Pretrial Preparation
12/5/2024	Travis Close	0.3	\$850	\$255	Review and analyze notes from this morning's m/c re: jury instructions and further tasks for completion	Trial and Pretrial Preparation
12/5/2024	Travis Close	0.6	\$850	\$510	Revisions to proposed instruction & supporting statement re: good faith belief	Trial and Pretrial Preparation
12/5/2024	Travis Close	1.3	\$850	\$1,105	Revisions to proposed special instruction & supporting statement re: "presumption of official duty"	Trial and Pretrial Preparation
12/5/2024	Travis Close	0.7	\$850	\$595	Review and analyze combined revised jury instructions	Trial and Pretrial Preparation
12/5/2024	Travis Close	1.4	\$850	\$1,190	Draft statement in support of jury instruction re: "building officials have no power to modify the law"	Trial and Pretrial Preparation
12/5/2024	Travis Close	0.3	\$850	\$255	Meet with jury instructions sub-team re: final instructions for review and submission	Trial and Pretrial Preparation
12/5/2024	Travis Close	0.4	\$850	\$340	Review and analyze plaintiffs' proposed special verdict from	Trial and Pretrial Preparation
12/5/2024	Travis Close	1.5	\$850	\$1,275	Legal research re: whether mootness is jurisdictional; and cases that are good for us establishing such	Trial and Pretrial Preparation
12/5/2024	Travis Close	0.6	\$850	\$510	Edits to special jury instruction re: mootness	Trial and Pretrial Preparation
12/5/2024	Travis Close	0.4	\$850	\$340	Meeting with jury instructions sub-team re: final additions/edits before submission	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/6/2024	Guy Wallace	0.7	\$1,350	\$945	zoom with GG; JY; BBK; AS; MEC; KS; MTJ; TCC; RLS re trial time estimate; motion for bench trial; preparation for focus group	Trial and Pretrial Preparation
12/6/2024	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of revised trial time estimates; drafts of joint submission re total trial time; com's with JY; MTJ re same	Trial and Pretrial Preparation
12/6/2024	Guy Wallace	0.4	\$1,350	\$540	com's with Waters; MTJ re 1985 CBC and application of standards; limits compared to 1991 ADAAG	Trial and Pretrial Preparation
12/6/2024	Mark Johnson	0.6	\$1,150	\$690	email exchanges w/ COC JY and BBK re trial witness time estimates, including Dolcater, Feaster and Mastin. review estimates, review Dolcater email and attachments.	Trial and Pretrial Preparation
12/6/2024	Mark Johnson	0.5	\$1,150	\$575	calls w/ GBW re jury instructions, time estimates for trial, trial strategy re expert testimony, expert issues.	Trial and Pretrial Preparation
12/6/2024	Mark Johnson	2.8	\$1,150	\$3,220	analyze jury instructions, code sections and other materials and prepare chart of expert disputes re standards.	Trial and Pretrial Preparation
12/6/2024	Mark Johnson	0.3	\$1,150	\$345	coms w/ COC re time estimates and filing re same, review multiple iterations of same and coms w/ OC	Trial and Pretrial Preparation
12/6/2024	Rachel Steyer	0.3	\$750	\$225	reviewing defendants' proposed jury form	Trial and Pretrial Preparation
12/6/2024	Rachel Steyer	1.0	\$750	\$750	updating jury instructions spreadsheet to track final filed jury instructions	Trial and Pretrial Preparation
12/6/2024	Rachel Steyer	0.6	\$750	\$450	weekly zoom with co-counsel, GBW, MTJ, BSU re ongoing tasks and assignments	Trial and Pretrial Preparation
12/6/2024	Rachel Steyer	0.2	\$750	\$150	reviewing chart of expert disputes circulated by MTJ	Trial and Pretrial Preparation
12/6/2024	Travis Close	0.5	\$850	\$425	Bi-weekly team meeting re: motion for bench trial	Trial and Pretrial Preparation
12/6/2024	Travis Close	0.3	\$850	\$255	Email to LEC re: assignments to prioritize for next week	Trial and Pretrial Preparation
12/6/2024	Travis Close	0.4	\$850	\$340	Call with GBW discussing motion for bench trial	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/6/2024	Travis Close	1.4	\$850	\$1,190	Review and analyze parties' proposed jury instructions & supporting statements (as filed) for errata	Trial and Pretrial Preparation
12/6/2024	Travis Close	0.4	\$850	\$340	review and analyze parties' response re: trial time estimates	Trial and Pretrial Preparation
12/7/2024	Guy Wallace	2.2	\$1,350	\$2,970	legal research and analysis re line of cases re violations of Title 24 of the CBC constitutes a violation of the Unruh Act	Trial and Pretrial Preparation
12/8/2024	Guy Wallace	2.7	\$1,350	\$3,645	review and analysis of Defendants' settlement term sheet; preparation of response points re same; drafting Statement for December 12, 2024 Settlement Conference	Settlement
12/8/2024	Guy Wallace	3.2	\$1,350	\$4,320	preparation of arguments and points for focus group; legal research and analysis re intent and willful affirmative misconduct	Trial and Pretrial Preparation
12/9/2024	Guy Wallace	4.8	\$1,350	\$6,480	preparation and drafting of statement for December 12, 2024 settlement conference with MJ Spero	Settlement
12/9/2024	Guy Wallace	0.5	\$1,350	\$675	zoom with Sonia Chopra and NJP; GG; AS; MEC; re preparation for focus group	Trial and Pretrial Preparation
12/9/2024	Guy Wallace	0.8	\$1,350	\$1,080	com's with GG; MTJ re preparation for focus group	Trial and Pretrial Preparation
12/9/2024	Guy Wallace	2.2	\$1,350	\$2,970	preparation of outline of Plaintiffs' presentation for focus group	Trial and Pretrial Preparation
12/9/2024	Mark Johnson	0.8	\$1,150	\$920	planning meeting w/ consultants Chopra and Danigole and COC Wallace, Grunfeld, Maya Campbell, Spiegel re jury focus group	Trial and Pretrial Preparation
12/9/2024	Mark Johnson	0.5	\$1,150	\$575	Zoom follow up w/ Wallace and Grunfeld re prep for focus group	Trial and Pretrial Preparation
12/9/2024	Mark Johnson	3.5	\$1,150	\$4,025	review and analyze emails and attachments from undisclosed trial witness.	Trial and Pretrial Preparation
12/9/2024	Rachel Steyer	0.4	\$750	\$300	reviewing settlement statement and positions	Settlement

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/9/2024	Rachel Steyer	3.1	\$750	\$2,325	preparing chart tracking identified barriers defendants dispute	Trial and Pretrial Preparation
12/9/2024	Travis Close	1.5	\$850	\$1,275	Research extent of legal scope of release for claims of class members vs plaintiffs	Settlement
12/9/2024	Travis Close	0.7	\$850	\$595	Review and analyze plaintiffs' settlement statement and attached term sheet	Settlement
12/9/2024	Travis Close	1.7	\$850	\$1,445	Legal research on elements required to prove structural impracticability affirmative defense	Trial and Pretrial Preparation
12/9/2024	Travis Close	0.2	\$850	\$170	Review and analyze parties' voir dire questions	Trial and Pretrial Preparation
12/9/2024	Travis Close	0.4	\$850	\$340	Review and analyze plaintiffs' and defendants' proposed form of verdict	Trial and Pretrial Preparation
12/9/2024	Travis Close	1.6	\$850	\$1,360	Research standard for proving due process affirmative defense to ADA Title III claims	Trial and Pretrial Preparation
12/10/2024	Guy Wallace	1.6	\$1,350	\$2,160	preparation of presentation for focus group	Trial and Pretrial Preparation
12/10/2024	Guy Wallace	2.7	\$1,350	\$3,645	preparation of topics, points and slides for focus group; com's with MTJ; JAU; TCC; TBS re same (1.1)	Trial and Pretrial Preparation
12/10/2024	Guy Wallace	0.9	\$1,350	\$1,215	preparation of introduction to presentation for focus group	Trial and Pretrial Preparation
12/10/2024	Jennifer Bybee	0.4	\$925	\$370	Com's with GBW re preparation for mock trial	Trial and Pretrial Preparation
12/10/2024	Jennifer Bybee	0.3	\$925	\$278	Draft and send list of barriers to GBW	Trial and Pretrial Preparation
12/10/2024	Jennifer Bybee	1.8	\$925	\$1,665	Look up various dates for timeline of access barrier removal slide	Trial and Pretrial Preparation
12/10/2024	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW re barriers and Brookhust and San Ramon for presentation at Mock Trial / Focus group.	Trial and Pretrial Preparation
12/10/2024	Travis Close	0.2	\$850	\$170	Email to GBW re: details about mock trial	Trial and Pretrial Preparation
12/10/2024	Travis Close	0.2	\$850	\$170	Email to LEC re: video sync & depo transcripts to request from vendor	Trial and Pretrial Preparation
12/10/2024	Travis Close	0.4	\$850	\$340	Call with GBW re: FSP timeline assignment	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/10/2024	Travis Close	0.3	\$850	\$255	Call with MTJ re: assignments for this week - prepping for mock trial	Trial and Pretrial Preparation
12/10/2024	Travis Close	0.7	\$850	\$595	Draft outline for FSP slides -- mock trial	Trial and Pretrial Preparation
12/10/2024	Travis Close	1.5	\$850	\$1,275	Draft slides for FSP presentation -- mock trial: first version of policy; Title page, slide 1 - what is transferring; slide 6 - what's the problem	Trial and Pretrial Preparation
12/10/2024	Travis Close	1.6	\$850	\$1,360	Draft slides for mock trial - FSP presentation - slides 4-11 (FSP versions, regulation prohibits, plaintiff complaints)	Trial and Pretrial Preparation
12/10/2024	Travis Close	0.7	\$850	\$595	Review and analyze depo testimony of Michael Johnson to identify key admissions & statements of Brookdale's positions for mock trial	Trial and Pretrial Preparation
12/10/2024	Travis Close	0.8	\$850	\$680	Review and analyze depo testimony of Douglas Cross (vols 1 & 2) to identify responses to Brookdale's positions re: FSP enforcement & affirmative defenses	Trial and Pretrial Preparation
12/11/2024	Guy Wallace	3.1	\$1,350	\$4,185	preparation of outline of presentation for focus group; necessary evidentiary support and slides	Trial and Pretrial Preparation
12/11/2024	Guy Wallace	1.3	\$1,350	\$1,755	preparation of jury instructions for focus group; com's with MTJ re same (.4)	Trial and Pretrial Preparation
12/11/2024	Guy Wallace	0.5	\$1,350	\$675	review and analysis of draft slides prepared by MTJ; TCC re issues of intent; FSP for the focus group	Trial and Pretrial Preparation
12/11/2024	Guy Wallace	3.3	\$1,350	\$4,455	preparation of notes for focus group presentation; identification of slides for presentation; access barriers to be presented; testimony from Defendants' witnesses to be presented	Trial and Pretrial Preparation
12/11/2024	Guy Wallace	1.9	\$1,350	\$2,565	preparation of notes for focus group presentation; identification of specific barriers re Stiner; Algarme; common areas; common room barriers; review and analysis of and revise and edit timeline slides	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/11/2024	Guy Wallace	1.3	\$1,350	\$1,755	preparation of draft verdict form for focus group; com's with MTJ; JAU re same	Trial and Pretrial Preparation
12/11/2024	Guy Wallace	1.5	\$1,350	\$2,025	preparation of notes and jury instructions for focus group; com's with MTJ re same (.7)	Trial and Pretrial Preparation
12/11/2024	Jennifer Bybee	0.5	\$925	\$463	Finalize text for timeline slide re access claims	Trial and Pretrial Preparation
12/11/2024	Jennifer Bybee	0.3	\$925	\$278	Com's with GBW re demonstratives and moot preparation	Trial and Pretrial Preparation
12/11/2024	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re special verdict form	Trial and Pretrial Preparation
12/11/2024	Jennifer Bybee	0.4	\$925	\$370	Look for dates J. Algarne made reports to Brookdale about access barriers	Trial and Pretrial Preparation
12/11/2024	Jennifer Bybee	0.1	\$925	\$93	Look for amended Exhibit D and email MTJ re same	Trial and Pretrial Preparation
12/11/2024	Jennifer Bybee	0.4	\$925	\$370	Draft special verdict form for San Ramon and focus group	Trial and Pretrial Preparation
12/11/2024	Mark Johnson	0.7	\$1,150	\$805	review comparison chart of disputed barriers from RLS for meet and confer re same; draft email with proposed approach and questions	Trial and Pretrial Preparation
12/11/2024	Mark Johnson	0.9	\$1,150	\$1,035	Call w/ GBW re abbreviated jury instructions for mock trial, strategy for same; settlement possibilities.	Trial and Pretrial Preparation
12/11/2024	Mark Johnson	0.9	\$1,150	\$1,035	calls w/ GBW (x7) re planning and work for mock trial	Trial and Pretrial Preparation
12/11/2024	Mark Johnson	5.0	\$1,150	\$5,750	work on prep for mock trial, including powerpoint preparations, review of abbreviated jury instructions, pulling depo excerpts, reviewing expert barrier reports, etc.	Trial and Pretrial Preparation
12/11/2024	Rachel Steyer	0.4	\$750	\$300	reviewing earlier Mastin PSMJ common barrier reports, comparing to barriers defendants identified	Trial and Pretrial Preparation
12/11/2024	Rachel Steyer	0.4	\$750	\$300	call with GBW to review and discuss pre trial prep assignments	Trial and Pretrial Preparation
12/11/2024	Travis Close	0.2	\$850	\$170	Email to LEC re: sharing video received from Michael Johnson depo	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/11/2024	Travis Close	0.2	\$850	\$170	Email to team re: draft FSP slides for mock trial	Trial and Pretrial Preparation
12/11/2024	Travis Close	2.6	\$850	\$2,210	Continue drafting fleet safety policy slides for mock trial -- direct threat (#16-18)	Trial and Pretrial Preparation
12/11/2024	Travis Close	1.2	\$850	\$1,020	Continue drafting fleet safety policy slides for mock trial -- solutions for plaintiffs and class members	Trial and Pretrial Preparation
12/11/2024	Travis Close	2.4	\$850	\$2,040	Continue drafting fleet safety policy slides for mock trial -- plaintiff and class member complaints	Trial and Pretrial Preparation
12/11/2024	Travis Close	1.7	\$850	\$1,445	Continue drafting fleet safety policy slides for mock trial -- yearly revisions & timeline	Trial and Pretrial Preparation
12/12/2024	Guy Wallace	0.6	\$1,350	\$810	preparation and drafting of notes for focus group presentation	Trial and Pretrial Preparation
12/12/2024	Guy Wallace	4.8	\$1,350	\$6,480	preparation and drafting of detailed outline of presentation for focus group; jury instructions for focus group; verdict form for focus groups	Trial and Pretrial Preparation
12/12/2024	Guy Wallace	2.2	\$1,350	\$2,970	preparation of notes re focus group presentation	Trial and Pretrial Preparation
12/12/2024	Guy Wallace	1.8	\$1,350	\$2,430	review and analysis of RBGG mock defense presentation for focus group; com's with MTJ re same (.7)	Trial and Pretrial Preparation
12/12/2024	Jennifer Bybee	1.1	\$925	\$1,018	Draft verdict form for Brookdale San Ramon	Trial and Pretrial Preparation
12/12/2024	Jennifer Bybee	0.2	\$925	\$185	Review timeline slides and email TBS re same	Trial and Pretrial Preparation
12/12/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re verdict forms	Trial and Pretrial Preparation
12/12/2024	Jennifer Bybee	1.0	\$925	\$925	Add Brookhurst info to verdict form for focus group	Trial and Pretrial Preparation
12/12/2024	Jennifer Bybee	0.7	\$925	\$648	Assemble photos used in verdict form for transmission to mock trial hosts	Trial and Pretrial Preparation
12/12/2024	Mark Johnson	0.9	\$1,150	\$1,035	Work on outline and comment on D defenses and argument for planning mock trial	Trial and Pretrial Preparation
12/12/2024	Rachel Steyer	0.9	\$750	\$675	reviewing Reddy and Ward depo transcripts for excerpts re access barriers, transmitting to GBW, MTJ, JSY	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/12/2024	Rachel Steyer	5.6	\$750	\$4,200	flight time from NYC to SFO in order to attend mock trial presentation	Trial and Pretrial Preparation
12/12/2024	Travis Close	0.7	\$850	\$595	Email to Doug Cross with update on case, trial tentative plans, & pretrial statement	Trial and Pretrial Preparation
12/12/2024	Travis Close	0.3	\$850	\$255	Email to Chopra Litigation Consulting re: details on positions of Brookdale's employees from who we will elicit testimony	Trial and Pretrial Preparation
12/12/2024	Travis Close	0.2	\$850	\$170	Email to KS (co-counsel) re: videos of Plaintiffs from depositions needed	Trial and Pretrial Preparation
12/12/2024	Travis Close	0.8	\$850	\$680	Review and analyze proposed depo excerpts from executive directors for mock trial	Trial and Pretrial Preparation
12/12/2024	Travis Close	1.5	\$850	\$1,275	Analyze testimony from Michael Johnson deposition re: direct threat analysis, WC19, safety, for mock trial presentation	Trial and Pretrial Preparation
12/12/2024	Travis Close	0.6	\$850	\$510	Analyze testimony from Jeanette Algarme depositon re: denial of access to Brookdale's transportation services due to FSP / powerchair	Trial and Pretrial Preparation
12/12/2024	Travis Close	0.7	\$850	\$595	Analyze testimony from Bernie Jestrabek-Hart depositons re: denial of access to Brookdale's transportation services due to FSP / powerchair	Trial and Pretrial Preparation
12/12/2024	Travis Close	0.7	\$850	\$595	Analyze testimony from Stacia Stiner depositons re: denial of access to Brookdale's transportation services due to FSP / powerchair	Trial and Pretrial Preparation
12/12/2024	Travis Close	1.4	\$850	\$1,190	Compile video of Michael Johnson deposition, create excerpts for relevant testimony re: direct threat; insert into slides for mock trial	Trial and Pretrial Preparation
12/12/2024	Travis Close	0.4	\$850	\$340	Review and analyze outline of defendants' slides for mock trial	Trial and Pretrial Preparation
12/12/2024	Travis Close	0.3	\$850	\$255	Review and analyze memo by co-counsel re: outline of disputed jury instructions on specific access barriers	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/13/2024	Guy Wallace	1.8	\$1,350	\$2,430	review and analysis of Court's order re summary judgment; zoom with GG: JY; BBK; AS; MEC; KS; BU; MTJ; TCC; RLS re same	Motion for Summary Judgment / Adjudicaiton
12/13/2024	Guy Wallace	3.1	\$1,350	\$4,185	preparation and drafting of presentation for focus group	Trial and Pretrial Preparation
12/13/2024	Guy Wallace	3.8	\$1,350	\$5,130	preparation of further draft of notes for focus group presentation; com's with MTJ; TCC; RLS re same (1.1)	Trial and Pretrial Preparation
12/13/2024	Guy Wallace	1.9	\$1,350	\$2,565	conf with TMS; MTJ; JAU; TCC; RLS re preparation for focus group; revise and edit presentation re same; analysis of photos of barriers and slides	Trial and Pretrial Preparation
12/13/2024	Jennifer Bybee	0.7	\$925	\$648	Review outline of Defense argument for mock trial	Trial and Pretrial Preparation
12/13/2024	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re photos and mock trial	Trial and Pretrial Preparation
12/13/2024	Jennifer Bybee	1.9	\$925	\$1,758	Run through of mock trial presentation via Teams with TMS, GBW, MTJ, RLS and TLC	Trial and Pretrial Preparation
12/13/2024	Jennifer Bybee	4.0	\$925	\$3,700	Travel to San Francisco from Portland for mock trial on 12/14	Trial and Pretrial Preparation
12/13/2024	Jennifer Bybee	0.7	\$925	\$648	Zoom call with co-counsel re Order re summary judgment	Trial and Pretrial Preparation
12/13/2024	Jennifer Bybee	0.3	\$925	\$278	Review summary judgment order	Trial and Pretrial Preparation
12/13/2024	Mark Johnson	0.4	\$1,150	\$460	review and analyze Ruling on cross MSJ motions	Motion for Summary Judgment / Adjudicaiton
12/13/2024	Mark Johnson	5.0	\$1,150	\$5,750	participate in prep for jury focus group presentation, discussion re trial strategy.	Trial and Pretrial Preparation
12/13/2024	Mark Johnson	0.6	\$1,150	\$690	zoom call w/ Wallace, Close, Bybee, Steyer and RBGG counsel re analysis and implications of Ruling on MSJ	Trial and Pretrial Preparation
12/13/2024	Mark Johnson	0.7	\$1,150	\$805	re-work jury instructions and neutral statement of the case to take into account cross MSJ rulings	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/13/2024	Mark Johnson	1.8	\$1,150	\$2,070	work on creation / revision of powerpoint slides for focus group presentation.	Trial and Pretrial Preparation
12/13/2024	Rachel Steyer	0.3	\$750	\$225	reviewing BBK memo re disputed jury instructions re barriers	Trial and Pretrial Preparation
12/13/2024	Rachel Steyer	0.2	\$750	\$150	reviewing Kimia Ataeian depo transcript, transmitting relevant excerpt to GBW and MTJ for mock trial	Trial and Pretrial Preparation
12/13/2024	Rachel Steyer	0.3	\$750	\$225	call with Wendy DeMello, provided update case PMSJ ruling and trial update	Trial and Pretrial Preparation
12/13/2024	Rachel Steyer	0.5	\$750	\$375	zoom with RBGG, BSU co-counsel, GBW, MTJ, JUB, TCC re PMSJ ruling	Trial and Pretrial Preparation
12/13/2024	Rachel Steyer	3.5	\$750	\$2,625	group gathering with TCC, MTJ, GBW, TMS for mock trial opening presentation	Trial and Pretrial Preparation
12/13/2024	Rachel Steyer	0.7	\$750	\$525	further review of Ataeian depo transcript for testimony excerpts re barriers	Trial and Pretrial Preparation
12/13/2024	Rachel Steyer	0.2	\$750	\$150	reviewing email from TCC outlining notes from trial presentation session	Trial and Pretrial Preparation
12/13/2024	Rachel Steyer	0.4	\$750	\$300	preparing email to GBW, MTJ, TCC, JUB with notes re Brookhurst witnesses' barriers	Trial and Pretrial Preparation
12/13/2024	Travis Close	0.6	\$850	\$510	Taxi to SEA airport from home for mock trial & pretrial conference	Trial and Pretrial Preparation
12/13/2024	Travis Close	3.8	\$850	\$3,230	Flight from SEA to SFO airports for mock trial & pretrial conference (check in, board, flight, baggage)	Trial and Pretrial Preparation
12/13/2024	Travis Close	0.4	\$850	\$340	Review and analyze memo from co-counsel re: trial subpoena of witnesses	Trial and Pretrial Preparation
12/13/2024	Travis Close	5.3	\$850	\$4,505	Presentation review in-office -- with GBW, MTJ, RLS. TS -- prep for Mock trial (San Ramon, Brookhurst, FSP presentations)	Trial and Pretrial Preparation
12/13/2024	Travis Close	0.6	\$850	\$510	Meeting with RLS, MTJ, GBW, co-counsel re: debriefing after MSJ	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/13/2024	Travis Close	2.2	\$850	\$1,870	Further revisions to presentation slides for tomorrow's mock trial (plaintiffs' side)	Trial and Pretrial Preparation
12/13/2024	Travis Close	0.3	\$850	\$255	Call with GBW re: revisions to presentations slides	Trial and Pretrial Preparation
12/14/2024	Guy Wallace	0.8	\$1,350	\$1,080	preparation and drafting of presentation for focus group	Trial and Pretrial Preparation
12/14/2024	Guy Wallace	6.2	\$1,350	\$8,370	prepare for and participate in focus group for trial	Trial and Pretrial Preparation
12/14/2024	Guy Wallace	1.1	\$1,350	\$1,485	com's with BU; TMS; MTJ; JAU; RLS re results of focus group	Trial and Pretrial Preparation
12/14/2024	Jennifer Bybee	0.4	\$925	\$370	Review Order re Summary Judgment	Trial and Pretrial Preparation
12/14/2024	Jennifer Bybee	7.0	\$925	\$6,475	Attend mock trial at Nichols Research	Trial and Pretrial Preparation
12/14/2024	Jennifer Bybee	0.5	\$925	\$463	Com's with GBW re mock trial impressions	Trial and Pretrial Preparation
12/14/2024	Jennifer Bybee	3.4	\$925	\$3,145	Travel home from mock trial in San Francisco, CA to Portland, OR	Trial and Pretrial Preparation
12/14/2024	Jennifer Bybee	0.5	\$925	\$463	Draft email to GBW re mock trial impressions	Trial and Pretrial Preparation
12/14/2024	Mark Johnson	1.0	\$1,150	\$1,150	travel to / from mock trial / focus group session in SF	Trial and Pretrial Preparation
12/14/2024	Mark Johnson	8.5	\$1,150	\$9,775	participate in facilitated focus group mock trial including observation of argument and deliberations, consultation with facilitators, feedback among co-counsel	Trial and Pretrial Preparation
12/14/2024	Mark Johnson	0.5	\$1,150	\$575	debriefing w/ COC and facilitators following focus group deliberations.	Trial and Pretrial Preparation
12/14/2024	Mark Johnson	0.7	\$1,150	\$805	setup and conference w/ facilitators, co-counsel in preparation for focus group argument, observation, information	Trial and Pretrial Preparation
12/14/2024	Mark Johnson	0.1	\$1,150	\$115	email exchange w/ OC re meeting and conferring prior to pre-trial conference.	Trial and Pretrial Preparation
12/14/2024	Rachel Steyer	8.5	\$750	\$6,375	attended mock trial	Trial and Pretrial Preparation
12/14/2024	Travis Close	0.7	\$850	\$595	Final revisions to presentation slides before mock trial	Trial and Pretrial Preparation
12/14/2024	Travis Close	1.0	\$850	\$850	Arrival at mock trial & preparation for plaintiffs' presentation (8:10-9:10)	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/14/2024	Travis Close	1.5	\$850	\$1,275	Mock trial -- present slides for plaintiffs' presentation	Trial and Pretrial Preparation
12/14/2024	Travis Close	1.3	\$850	\$1,105	Mock trial -- Defendants' presentation (observation)	Trial and Pretrial Preparation
12/14/2024	Travis Close	0.6	\$850	\$510	Mock trial - jury instructions	Trial and Pretrial Preparation
12/15/2024	Guy Wallace	1.2	\$1,350	\$1,620	review and analysis of district court order on cross motions for summary judgment	Motion for Summary Judgment / Adjudication
12/15/2024	Guy Wallace	0.8	\$1,350	\$1,080	preparation for pretrial conference; issues to be raised with the District Court	Trial and Pretrial Preparation
12/15/2024	Guy Wallace	0.5	\$1,350	\$675	com's with GG; MTJ re meet and confer with Defendants re Pretrial Conference	Trial and Pretrial Preparation
12/15/2024	Guy Wallace	0.8	\$1,350	\$1,080	zoom with Rutner; Bertino; Jacobsen; GG; MTJ re preparation for pretrial conference	Trial and Pretrial Preparation
12/15/2024	Mark Johnson	0.3	\$1,150	\$345	call w/ Stacy Stiner re MSJ ruling and impact on class claims and her individual case	Case Organization, Planning and Strategy
12/15/2024	Mark Johnson	0.9	\$1,150	\$1,035	meet and confer zoom w/ OC Rutner, Bertino, Jacobsen, Moore, Khana and COC Wallace, Grunfeld re impact of MSJ ruling on pre-trial filings and issues to be presented at pre-trial conference.	Trial and Pretrial Preparation
12/15/2024	Mark Johnson	0.3	\$1,150	\$345	calls w/ GBW re topics for zoom conference w/ OC re pre-trial conference	Trial and Pretrial Preparation
12/15/2024	Mark Johnson	0.1	\$1,150	\$115	emails w/ OC and review agenda for zoom call re pre-trial conference	Trial and Pretrial Preparation
12/15/2024	Mark Johnson	0.2	\$1,150	\$230	review and analyze Algarme release in other case and draft email to COC re same	Trial and Pretrial Preparation
12/16/2024	Guy Wallace	0.5	\$1,350	\$675	review and analysis of Rule 54 re entry of judgment re issues and parties; com's with GG; MTJ re same	Appeal
12/16/2024	Guy Wallace	0.7	\$1,350	\$945	analysis of potential appeal of District Court decision and intentional discrimination re Unruh Act claims for new construction violations; com's with GG; TMS; MTJ re same	Appeal

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/16/2024	Guy Wallace	0.5	\$1,350	\$675	review and analysis of draft of revised proposed order re Plaintiffs' motion for partial summary judgment	Motion for Summary Judgment / Adjudication
12/16/2024	Guy Wallace	2.3	\$1,350	\$3,105	preparation for pretrial conference; analysis of results of meet and confer with Defendants; review and analysis of pending MILs; Pretrial Statement	Trial and Pretrial Preparation
12/16/2024	Guy Wallace	1.3	\$1,350	\$1,755	com's with GG; JY; BU; MTJ re preparation for Pretrial Conference	Trial and Pretrial Preparation
12/16/2024	Guy Wallace	0.5	\$1,350	\$675	com's with BU re Pretrial Conference and MILs	Trial and Pretrial Preparation
12/16/2024	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of MILs: preparation for Pretrial Conference	Trial and Pretrial Preparation
12/16/2024	Jennifer Bybee	0.3	\$925	\$278	Draft email to GBW re impressions / notes from mock trial	Trial and Pretrial Preparation
12/16/2024	Jennifer Bybee	3.5	\$925	\$3,238	Watch room 1 jury video from mock trial	Trial and Pretrial Preparation
12/16/2024	Jennifer Bybee	0.3	\$925	\$278	Watch video of group 2 at mock trial	Trial and Pretrial Preparation
12/16/2024	Mark Johnson	0.2	\$1,150	\$230	review Algarne complaint for context of release Ds intend to introduce for preclusion	Case Organization, Planning and Strategy
12/16/2024	Mark Johnson	1.7	\$1,150	\$1,955	complete review and revision of draft discovery ltr re 30b6 depo topics, draft email to COC re same.	Discovery (Non-Deposition)
12/16/2024	Mark Johnson	0.8	\$1,150	\$920	call w/ GBW re settlement submission and posture, impact of msj ruling,	Settlement
12/16/2024	Mark Johnson	1.4	\$1,150	\$1,610	zoom call with Wallace, Yelin, Grunfeld re preparation for pre-trial conference, motions in limine, D's proposal for filing pre-conference statement.	Trial and Pretrial Preparation
12/16/2024	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW re pre-trial conference, motions in limine, expectations re defendants evidence.	Trial and Pretrial Preparation
12/16/2024	Mark Johnson	0.8	\$1,150	\$920	prepare chart of Brookhurst barriers by category and common area v room barriers. review demonstratives for same.	Trial and Pretrial Preparation
12/16/2024	Rachel Steyer	0.5	\$750	\$375	reviewing order re PMSJ	Motion for Summary Judgment / Adjudication

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/16/2024	Rachel Steyer	0.3	\$750	\$225	reviewing BM memo re subpoenas	Trial and Pretrial Preparation
12/16/2024	Rachel Steyer	0.2	\$750	\$150	call with Tiffany Boyd providing case status update following PMSJ, testimony re access barriers at Scotts Valley no longer needed	Trial and Pretrial Preparation
12/16/2024	Travis Close	0.1	\$850	\$85	Review and analyze stipulation and proposed order re: pretrial conference reporter	Trial and Pretrial Preparation
12/16/2024	Travis Close	0.3	\$850	\$255	Email to team re: debrief after Saturday's mock trial	Trial and Pretrial Preparation
12/16/2024	Travis Close	0.7	\$850	\$595	Review and analyze testimony from Stacy re: experience with transportation services / FSP	Trial and Pretrial Preparation
12/16/2024	Travis Close	0.5	\$850	\$425	Review and analyze pretrial statement for further tasks to complete before tomorrow's conference	Trial and Pretrial Preparation
12/16/2024	Travis Close	1.4	\$850	\$1,190	Legal research on whether failure to give reasonable modification constitutes intentional discrimination under the Unruh Act	Trial and Pretrial Preparation
12/16/2024	Travis Close	1.6	\$850	\$1,360	Prep for pretrial conference -- research cases interpreting whether novel application of a regulation constitutes fair notice or implicates due process concerns	Trial and Pretrial Preparation
12/16/2024	Travis Close	1.7	\$850	\$1,445	Prep for pre-trial conference - legal research on what constitutes fair notice of an affirmative defense	Trial and Pretrial Preparation
12/16/2024	Travis Close	0.7	\$850	\$595	Research whether "good faith reliance" constitutes an affirmative defense to the application of a regulatory provision	Trial and Pretrial Preparation
12/17/2024	Guy Wallace	1.3	\$1,350	\$1,755	analysis of settlement posture and potential; formulation of proposal as directed by MJ Spero; com's with MTJ re same (.5)	Settlement
12/17/2024	Guy Wallace	2.1	\$1,350	\$2,835	analysis of further settlement proposal and terms; com's with MTJ re same (.4)	Settlement
12/17/2024	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of Plaintiffs' MILs; preparation for Pretrial Conference	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/17/2024	Guy Wallace	0.4	\$1,350	\$540	com's with JAU re results of Pretrial Conference; focus group	Trial and Pretrial Preparation
12/17/2024	Guy Wallace	2.2	\$1,350	\$2,970	prepare for and attend Pretrial Conference	Trial and Pretrial Preparation
12/17/2024	Guy Wallace	0.8	\$1,350	\$1,080	conf with GG; JY; AS; MEC; DE; BU; MTJ; TCC; RLS re results of Pretrial Conference, follow up re P's motion for summary judgment; Ms. Algarme; class list	Trial and Pretrial Preparation
12/17/2024	Guy Wallace	1.8	\$1,350	\$2,430	prepare for Pretrial Conference; preparation of notes re same	Trial and Pretrial Preparation
12/17/2024	Jennifer Bybee	3.3	\$925	\$3,053	Watch video of room 2 of mock trial	Trial and Pretrial Preparation
12/17/2024	Mark Johnson	1.0	\$1,150	\$1,150	pre-trial conference	Case Management Conferences
12/17/2024	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW re issues for pre-trial conference; review proposed agenda for same	Case Management Conferences
12/17/2024	Mark Johnson	0.7	\$1,150	\$805	team mtg after pre-trial conference to discuss next steps, strategy and assignments	Case Organization, Planning and Strategy
12/17/2024	Mark Johnson	0.6	\$1,150	\$690	calls (x3) w/ GBW re take-aways from pre-trial conference, settlement demand strategy.	Case Organization, Planning and Strategy
12/17/2024	Mark Johnson	0.2	\$1,150	\$230	draft email to OC re class list and Algarme standing; com w/ COC re same, revise and send	Discovery (Non-Deposition)
12/17/2024	Mark Johnson	0.3	\$1,150	\$345	review and edits proposed revised order on mtn for partial summary judgment, coms w/ GCG re same.	Other Motions
12/17/2024	Mark Johnson	0.7	\$1,150	\$805	review MIL #3 and opposition in prep for pre-trial conference and possible arguments.	Other Motions
12/17/2024	Rachel Steyer	0.3	\$750	\$225	reviewing memo from BM re appellate issues vis a vis PMSJ ruling	Appeal
12/17/2024	Rachel Steyer	0.9	\$750	\$675	attended pre-trial conference/hearing	Trial and Pretrial Preparation
12/17/2024	Rachel Steyer	0.5	\$750	\$375	meeting with RBGG co-counsel, MTJ, GBW, TCC, BSU immediately following pre-trial conference	Trial and Pretrial Preparation
12/17/2024	Travis Close	1.0	\$850	\$850	Attend CMC with Judge Gilliam - pretrial conference	Case Management Conferences

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/17/2024	Travis Close	1.6	\$850	\$1,360	Review and analyze emails under custodian Kevin Bowman tagged "hot" for evidence of intentional discrimination re: accessibility	Trial and Pretrial Preparation
12/17/2024	Travis Close	1.4	\$850	\$1,190	Review and analyze emails tagged "hot" and "discrimination" for evidence of intentional discrimination re: physical accessibility	Trial and Pretrial Preparation
12/17/2024	Travis Close	0.2	\$850	\$170	Email to team re: evidence of intentional discrimination by Kevin Bowman	Trial and Pretrial Preparation
12/17/2024	Travis Close	0.4	\$850	\$340	Prep for pretrial conference -- review and analyze outline/notes by GBW and gather required materials	Trial and Pretrial Preparation
12/17/2024	Travis Close	0.2	\$850	\$170	Email to Doug Cross re: scheduling time to talk this week	Trial and Pretrial Preparation
12/17/2024	Travis Close	0.7	\$850	\$595	De-brief with RLS, GBW, MTJ, and co-counsel after pre-trial conference with Judge Gilliam	Trial and Pretrial Preparation
12/18/2024	Guy Wallace	0.7	\$1,350	\$945	review and analysis of letter from Rutner re Ms. Algame threatening litigation; com's with GG; MTJ re same	Communications With Opposing Counsel
12/18/2024	Guy Wallace	1.7	\$1,350	\$2,295	preparation and drafting of Plaintiffs' further settlement proposal as ordered by MJ Spero	Settlement
12/18/2024	Guy Wallace	2.7	\$1,350	\$3,645	preparation and drafting of further settlement proposal to Defendants; revise and edit same; com's with GG; BU; MTJ re same (1.2)	Settlement
12/18/2024	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re letter threatening to sue J. Algame	Trial and Pretrial Preparation
12/18/2024	Mark Johnson	0.8	\$1,150	\$920	calls w/ GBW (x5) re revised summary judgment proposed order, emails to OC, demand letter from OC re Algame, settlement position	Case Organization, Planning and Strategy
12/18/2024	Mark Johnson	0.2	\$1,150	\$230	calls (x2) w/ GBW re settlement term sheet	Settlement
12/18/2024	Mark Johnson	0.3	\$1,150	\$345	Review and draft response to OC Rutner re request for list of Brookhurst residents. com w/ GBW re same	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/18/2024	Mark Johnson	0.2	\$1,150	\$230	review and comment on draft communication with clients re summary judgment ruling.	Trial and Pretrial Preparation
12/18/2024	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW re D threat to sue Algarme, strategy for addressing same, interpretation of settlement agreement	Trial and Pretrial Preparation
12/18/2024	Rachel Steyer	0.2	\$750	\$150	reviewing letter from OC re Jeanette Algarme settlement letter and claims	Trial and Pretrial Preparation
12/18/2024	Rachel Steyer	0.6	\$750	\$450	reviewing pre-trial conference transcript	Trial and Pretrial Preparation
12/18/2024	Travis Close	2.3	\$850	\$1,955	Travel back from mock trial & pretrial conference -- arrive at SFO, luggage, check in, arrive at gate	Trial and Pretrial Preparation
12/18/2024	Travis Close	1.4	\$850	\$1,190	Travel back from mock trial & pretrial conference -- taxi on runway at SFO, delay due to fog (1hr)	Trial and Pretrial Preparation
12/18/2024	Travis Close	2.5	\$850	\$2,125	Travel back from mock trial & pretrial conference -- flight from SFO to SEA	Trial and Pretrial Preparation
12/18/2024	Travis Close	1.2	\$850	\$1,020	Travel back from mock trial & pretrial conference -- train/bus from Seatac to home	Trial and Pretrial Preparation
12/19/2024	Guy Wallace	0.5	\$1,350	\$675	revise and edit further draft of witness list and trial times; com's with JY; MTJ re same	Trial and Pretrial Preparation
12/19/2024	Guy Wallace	0.4	\$1,350	\$540	com's with ER; JY re preparation of further pretrial filings	Trial and Pretrial Preparation
12/19/2024	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re demonstratives and trial presentation	Trial and Pretrial Preparation
12/19/2024	Mark Johnson	0.3	\$1,150	\$345	review proposed revised MSJ Order, coms w/ COC re same and further revisions.	Other Motions
12/19/2024	Mark Johnson	0.2	\$1,150	\$230	review and respond to email from OC Rutner re Algarme medical records, list of Brookhurst residents; coms w/ COC re same	Trial and Pretrial Preparation
12/19/2024	Mark Johnson	1.0	\$1,150	\$1,150	review draft revised redlined exhibit list; draft email w/ comments re same to COC	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/19/2024	Mark Johnson	0.4	\$1,150	\$460	calls w/ GBW re D's witness list, proposed revisions to pre-trial statement, proposed responses re objectionable statments	Trial and Pretrial Preparation
12/19/2024	Rachel Steyer	0.6	\$750	\$450	reviewing defendants' revised pre-trial documents	Trial and Pretrial Preparation
12/19/2024	Rachel Steyer	0.2	\$750	\$150	reviewing revised exhibit list circulated by JSY with proposed deletions	Trial and Pretrial Preparation
12/19/2024	Travis Close	0.7	\$850	\$595	Analyze exhibit list for exhibits to be subtracted following the narrowing of the scope of trial	Trial and Pretrial Preparation
12/19/2024	Travis Close	1.4	\$850	\$1,190	legal research re: whether notice expressed in 10-k is sufficient to show fair notice from government of applicability of statute	Trial and Pretrial Preparation
12/19/2024	Travis Close	1.8	\$850	\$1,530	Analyze differences between Fleet Safety Policy versions; create chart and show differences over time between 2017-2024	Trial and Pretrial Preparation
12/20/2024	Guy Wallace	1.0	\$1,350	\$1,350	zoom with GG; JY; AS; BU; MTJ; JAU; TCC; RLS re preparation of revised pretrial submissions; Defendants' threatened litigation re Ms. Algarme	Trial and Pretrial Preparation
12/20/2024	Guy Wallace	0.4	\$1,350	\$540	com's with JY; MTJ re preparation of revised jury instructions; MILs	Trial and Pretrial Preparation
12/20/2024	Guy Wallace	0.6	\$1,350	\$810	com's with GG; JY; MTJ re response to Defendants' threats to file suit against Ms. Algarme; potential motion for relief under ADA re retaliation and intimidation	Trial and Pretrial Preparation
12/20/2024	Jennifer Bybee	1.0	\$925	\$925	Zoom call with co-counsel re threat to sue J. Algarme, MILs, planning, etc.	Trial and Pretrial Preparation
12/20/2024	Mark Johnson	1.0	\$1,150	\$1,150	trial team zoom mtg re pre-trial submissions, Algarme settlement and standing issue, meeting and conferring with OC, MILs. See agenda	Trial and Pretrial Preparation
12/20/2024	Mark Johnson	0.0	\$1,150	\$0	Zoom mtg w/ GBW, Grunfeld, Yelin re strategy for addressing D's threat to Algarme	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/20/2024	Mark Johnson	1.0	\$1,150	\$1,150	compare annotated version of Exhibit A to complaint to Mastin Brookhurst barrier report to identify ADAAG barriers not included in instruction.	Trial and Pretrial Preparation
12/20/2024	Mark Johnson	0.3	\$1,150	\$345	draft email to GBW and RLS summarizing and explaining results of analysis of ADAAG barriers for Brookurst for inclusion in jury instructions.	Trial and Pretrial Preparation
12/20/2024	Mark Johnson	2.5	\$1,150	\$2,875	work on revisions to jury instructions to address impact of ruling on partial summary judgment.	Trial and Pretrial Preparation
12/20/2024	Mark Johnson	0.5	\$1,150	\$575	calls w/ GBW (x3) re jury instructions, strategy for addressing Algarme standing issue and threats.	Trial and Pretrial Preparation
12/20/2024	Rachel Steyer	1.0	\$750	\$750	weekly zoom meeting with RBGG, GBW, MTJ, TCC, JUB, BSU to review and discuss ongoing tasks and assignments	Case Organization, Planning and Strategy
12/20/2024	Rachel Steyer	0.2	\$750	\$150	reviewing defendants' portion of draft letter brief re Jeanette Algarme medical records	Discovery (Non-Deposition)
12/20/2024	Rachel Steyer	0.4	\$750	\$300	reviewing and looking through depo designations to determine which ones needed deletion/revision	Trial and Pretrial Preparation
12/20/2024	Travis Close	0.2	\$850	\$170	Review and analyze Def's joint letter brief re: medical records for Algarme	Trial and Pretrial Preparation
12/20/2024	Travis Close	0.8	\$850	\$680	Review and analyze parties' MILs for sections that can be deleted in revised MIL submission	Trial and Pretrial Preparation
12/20/2024	Travis Close	0.7	\$850	\$595	Review and analyze Def's edits to updated pretrial statement	Trial and Pretrial Preparation
12/20/2024	Travis Close	0.3	\$850	\$255	Review and analyze Def's edits of joint neutral statement	Trial and Pretrial Preparation
12/20/2024	Travis Close	1.1	\$850	\$935	Meeting with RLS, MTJ, GBW, and co-counsel re: pretrial tasks, MILs, updates to jury instructions, etc	Trial and Pretrial Preparation
12/20/2024	Travis Close	0.4	\$850	\$340	Review and analyze parties' revisions to witness times and topics for trial	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/20/2024	Travis Close	0.7	\$850	\$595	Revisions to designations re: Def's responses to Algarne ROGs to reflect revised scope of upcoming trial	Trial and Pretrial Preparation
12/20/2024	Travis Close	0.3	\$850	\$255	Email to RLS re: assignment & splitting up work for revised depo & discovery designations	Trial and Pretrial Preparation
12/20/2024	Travis Close	0.5	\$850	\$425	Analysis of Brookdale's language in 2012-2017 10-ks warning investors of compliance with ADA	Trial and Pretrial Preparation
12/20/2024	Travis Close	0.6	\$850	\$510	Addition of exhibits to revised exhibit list regarding the BEST Standards, relevant to implementation of the FSP	Trial and Pretrial Preparation
12/20/2024	Travis Close	0.8	\$850	\$680	Revisions to designations re: Kevin Bowman 30(b)(6) depo, topic 10, to reflect revised scope of upcoming trial	Trial and Pretrial Preparation
12/20/2024	Travis Close	0.5	\$850	\$425	Revisions to depo designations from Jeffrey Toomer to reflect revised scope of upcoming trial	Trial and Pretrial Preparation
12/21/2024	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of Defendants' proposal re settlement; letter from Goodwin re same; com's with MTJ re same (.2)	Settlement
12/22/2024	Guy Wallace	3.2	\$1,350	\$4,320	preparation and drafting of letter to Goodwin re settlement; response to Goodwin communications of December 21, 2024	Settlement
12/22/2024	Guy Wallace	0.5	\$1,350	\$675	review and analysis of proposed changes to letter to Goodwin from GG; MTJ	Settlement
12/22/2024	Mark Johnson	0.6	\$1,150	\$690	review and draft proposed edits to draft GCG ltr to OC re Algarne release and demand for dismissal.	Case Organization, Planning and Strategy
12/22/2024	Mark Johnson	5.0	\$1,150	\$5,750	draft discovery ltr re Brookhurst resident list.	Discovery (Non-Deposition)
12/22/2024	Mark Johnson	0.6	\$1,150	\$690	review D response to settlement letter, counterproposal and GBW draft response	Settlement

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/22/2024	Mark Johnson	0.5	\$1,150	\$575	Review prior jury instructions and draft email to COC responding to inquires re disputed ADAAG instructions	Trial and Pretrial Preparation
12/23/2024	Guy Wallace	0.6	\$1,350	\$810	review and analysis of draft letters from GG; MTJ re Ms. Algarme and issues pertaining to Defendants' attacks on her and her standing to represent the subclasses	Other Motions
12/23/2024	Guy Wallace	0.7	\$1,350	\$945	revise and edit letter to Goodwin re settlement; com's with GG; MTJ re same	Settlement
12/23/2024	Guy Wallace	0.7	\$1,350	\$945	meet and confer with ER; JB; MJ; Moore; GG; JY; MTJ re pretrial preparation and revised pretrial filings; issues re Defendants' threats to Ms. Algarme; production of class list; depositions	Trial and Pretrial Preparation
12/23/2024	Guy Wallace	1.6	\$1,350	\$2,160	review and analysis of Defendants' revised Pretrial Statement; argument re ADAAG violations do not constitute a denial of full and equal enjoyment; legal research and analysis re same; com's with GG; JY; MTJ re same (.5)	Trial and Pretrial Preparation
12/23/2024	Guy Wallace	4.2	\$1,350	\$5,670	revise and edit Plaintiffs' proposed jury instructions	Trial and Pretrial Preparation
12/23/2024	Mark Johnson	0.2	\$1,150	\$230	review email to OC re threat to Algarme and demand to dismiss claims, emails re same.	Case Organization, Planning and Strategy
12/23/2024	Mark Johnson	0.2	\$1,150	\$230	review final draft of letter in response to Ds re settlement	Settlement
12/23/2024	Mark Johnson	0.6	\$1,150	\$690	zoom call w/ OC Rutner, Jacobsen, Moore, Bertino re pre-trial submission, Algarme release, MILs, evidence and arguments to be presented at trial. GBW, JY, BU, GCG participating.	Trial and Pretrial Preparation
12/23/2024	Mark Johnson	0.3	\$1,150	\$345	zoom call w/ GCG, GBW, JY to discuss strategy for meet and confer w/ OC	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/23/2024	Mark Johnson	0.6	\$1,150	\$690	call w GBW re D's witness list and pretrial statement, jury instructions and agenda for meet and confer	Trial and Pretrial Preparation
12/23/2024	Mark Johnson	0.5	\$1,150	\$575	calls w/ GBW re revised jury instructions	Trial and Pretrial Preparation
12/23/2024	Mark Johnson	0.2	\$1,150	\$230	review transcript of pre-trial conference for issues pertaining to meet and confer, including court's direction re mootness and direct threat evidence.	Trial and Pretrial Preparation
12/23/2024	Rachel Steyer	0.2	\$750	\$150	reviewing email from GCG to OC re settlement letter to Jeanette Algarne	Communications With Opposing Counsel
12/23/2024	Rachel Steyer	1.2	\$750	\$900	reviewing and revising depo designations	Trial and Pretrial Preparation
12/23/2024	Rachel Steyer	0.3	\$750	\$225	reviewing MTJ revisions to draft jury instructions	Trial and Pretrial Preparation
12/23/2024	Rachel Steyer	0.2	\$750	\$150	reviewing updated proposed exhibit list from JSY	Trial and Pretrial Preparation
12/23/2024	Rachel Steyer	0.4	\$750	\$300	reviewing GBW revisions to jury instructions	Trial and Pretrial Preparation
12/23/2024	Rachel Steyer	0.2	\$750	\$150	reviewing defendants' revised exhibit list and depo designations	Trial and Pretrial Preparation
12/23/2024	Travis Close	0.7	\$850	\$595	Revisions to depo designations to account for revised scope of trial -- Jeffrey Toomer	Trial and Pretrial Preparation
12/23/2024	Travis Close	1.2	\$850	\$1,020	Revisions to depo designations to account for revised scope of trial -- 30(b)(6) Topic 2	Trial and Pretrial Preparation
12/23/2024	Travis Close	0.3	\$850	\$255	Revisions to depo designations to account for revised scope of trial -- Rhonda Dolcater	Trial and Pretrial Preparation
12/23/2024	Travis Close	0.2	\$850	\$170	Email to RLS re: revisions to Algarne depo designations	Trial and Pretrial Preparation
12/23/2024	Travis Close	0.4	\$850	\$340	Review and analyze revised proposed exhibit list with changes to scope of trial incorporated	Trial and Pretrial Preparation
12/23/2024	Travis Close	0.1	\$850	\$85	Review and analyze parties' stipulation re: motions in limine	Trial and Pretrial Preparation
12/23/2024	Travis Close	0.8	\$850	\$680	Review and analyze proposed revised jury instructions to reflect scope of new trial following last week's pre-trial conference	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/23/2024	Travis Close	1.6	\$850	\$1,360	Legal research on whether parties may seek to challenge standing immediately after an order for summary judgment	Trial and Pretrial Preparation
12/24/2024	Guy Wallace	0.4	\$1,350	\$540	revise and edit draft motion to compel further class list re Brookhurst	Other Motions
12/24/2024	Guy Wallace	1.2	\$1,350	\$1,620	legal research and analysis re Defendants' argument that ADAAG violations are not sufficient to establish discrimination, i.e., the denial of full and equal enjoyment of the facility	Trial and Pretrial Preparation
12/24/2024	Guy Wallace	0.6	\$1,350	\$810	review and analysis of Defendants' revised jury instructions	Trial and Pretrial Preparation
12/24/2024	Travis Close	1.3	\$850	\$1,105	Final revisions to revised depo & discovery designations	Trial and Pretrial Preparation
12/24/2024	Travis Close	0.3	\$850	\$255	Review and analyze pltfs' draft section of joint letter brief re: Algarme's medical records	Trial and Pretrial Preparation
12/24/2024	Travis Close	0.6	\$850	\$510	Review and analyze latest facility evaluation and complaint investigation reports issued for Tracy, San Ramon, Scotts Valley, and Brookhurst facilities	Trial and Pretrial Preparation
12/24/2024	Travis Close	0.2	\$850	\$170	Email to RLS re: revisions to discovery/depo designations	Trial and Pretrial Preparation
12/26/2024	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re settlement potential, approach re discussions re same	Settlement
12/26/2024	Guy Wallace	0.3	\$1,350	\$405	review and analysis of District Court's Order denying motion for PSJ re Brookhurst barriers	Trial and Pretrial Preparation
12/26/2024	Guy Wallace	0.9	\$1,350	\$1,215	preparation of revised special verdict form	Trial and Pretrial Preparation
12/26/2024	Guy Wallace	0.7	\$1,350	\$945	zoom with GG; JY; MTJ re discovery issues re Ms. Algarme; class list; Defendants' proposed stipulation re ADAAG violations	Trial and Pretrial Preparation
12/26/2024	Guy Wallace	0.4	\$1,350	\$540	review and analysis of revised joint neutral statement of the case	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/26/2024	Mark Johnson	0.2	\$1,150	\$230	review decision from court denying mtn for summary judgment and proposing stipulation for trial.	Motion for Summary Judgment / Adjudication
12/26/2024	Mark Johnson	0.6	\$1,150	\$690	Zoom call w/ Grunfeld, Yelin, Wallace re strategy for responding to OC email re Algarme release, stipulation for trial	Trial and Pretrial Preparation
12/26/2024	Mark Johnson	0.3	\$1,150	\$345	calls (x12) w/ GBW re decision on summary judgment, settlement, responses to OC email re trial, Algarme release	Trial and Pretrial Preparation
12/26/2024	Rachel Steyer	0.2	\$750	\$150	reviewing red line version of defendants' revised discovery letter brief re Jeanette Algarme medical records	Discovery (Non-Deposition)
12/26/2024	Rachel Steyer	0.5	\$750	\$375	completing review and analysis of revised depo designations	Trial and Pretrial Preparation
12/27/2024	Guy Wallace	1.0	\$1,350	\$1,350	zoom with GG; KAS; MTJ re settlement	Settlement
12/27/2024	Guy Wallace	0.9	\$1,350	\$1,215	com's with Waters; MTJ re settlement; analysis of same	Settlement
12/27/2024	Guy Wallace	0.6	\$1,350	\$810	review and analysis of settlement redline from GG/JY	Settlement
12/27/2024	Guy Wallace	0.9	\$1,350	\$1,215	preparation of revised special verdict form	Trial and Pretrial Preparation
12/27/2024	Guy Wallace	0.7	\$1,350	\$945	review and analysis of draft of amended pretrial conference statement	Trial and Pretrial Preparation
12/27/2024	Guy Wallace	0.6	\$1,350	\$810	revise and edit draft special verdict form	Trial and Pretrial Preparation
12/27/2024	Guy Wallace	0.3	\$1,350	\$405	com's with RLS re Algarme, other potential Brookhurst class members and witnesses	Trial and Pretrial Preparation
12/27/2024	Guy Wallace	0.9	\$1,350	\$1,215	zoom with GG; JY; BU; MTJ; JAU; RLS re preparation of pretrial filings; Defendants' further motions re bench trial; re-opening of discovery	Trial and Pretrial Preparation
12/27/2024	Guy Wallace	2.3	\$1,350	\$3,105	review and analysis of draft of pretrial statement; revise and edit same	Trial and Pretrial Preparation
12/27/2024	Guy Wallace	0.3	\$1,350	\$405	com's with Chopra; JAU re voir dire	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/27/2024	Guy Wallace	0.4	\$1,350	\$540	analysis of further revisions to proposed jury instructions; com's with TMS re same	Trial and Pretrial Preparation
12/27/2024	Jennifer Bybee	0.8	\$925	\$740	Zoom call with co-counsel re trial preparation and upcoming deadlines	Trial and Pretrial Preparation
12/27/2024	Mark Johnson	1.1	\$1,150	\$1,265	zoom call w/ Grunfeld, Stebner, Wallace re settlement prospects, strategy	Settlement
12/27/2024	Mark Johnson	0.7	\$1,150	\$805	team zoom mtg re pre-trial submission, trial prep issues and questions to be posed to Defendants re position on scope of trial..	Trial and Pretrial Preparation
12/27/2024	Rachel Steyer	0.7	\$750	\$525	weekly meeting with RBGG, BSU, JUB, MTJ, GBW re ongoing tasks and assignments	Case Organization, Planning and Strategy
12/27/2024	Rachel Steyer	0.3	\$750	\$225	reviewing defendants' motion for bench trial	Other Motions
12/27/2024	Rachel Steyer	0.2	\$750	\$150	call with GBW re Brookhurst witnesses	Trial and Pretrial Preparation
12/27/2024	Rachel Steyer	0.3	\$750	\$225	attempted outreach to Brookhurst class members to identify additional witnesses/plaintiffs	Trial and Pretrial Preparation
12/27/2024	Rachel Steyer	0.3	\$750	\$225	reviewing revised portions of neutral case statement and pre-trial statement circulated by JSY	Trial and Pretrial Preparation
12/28/2024	Guy Wallace	0.7	\$1,350	\$945	revise and edit Plaintiffs' Motion in Limine Number 4 - Defendants' improper affirmative defenses	Other Motions
12/28/2024	Guy Wallace	0.9	\$1,350	\$1,215	com's with KAS; GG; MTJ re settlement	Settlement
12/28/2024	Guy Wallace	0.4	\$1,350	\$540	com's with KAS; GG; MTJ re settlement and further follow-up with Goodwin	Settlement
12/28/2024	Guy Wallace	0.3	\$1,350	\$405	review and analysis of Defendants' proposed special verdict form	Trial and Pretrial Preparation
12/28/2024	Guy Wallace	2.1	\$1,350	\$2,835	preparation of revised version of Motion in Limine #4	Trial and Pretrial Preparation
12/28/2024	Mark Johnson	0.4	\$1,150	\$460	Call w/ GBW re motions in limine, D's defenses and positions taken in jury instructions	Other Motions
12/28/2024	Mark Johnson	0.3	\$1,150	\$345	call w/ Stebner, Grunfeld, Wallace re settlement and proposed call btwn Stebner and Goodwin, strategy re same.	Settlement

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/28/2024	Mark Johnson	0.5	\$1,150	\$575	calls w/ GBW (x2) re settlement, trial prep	Trial and Pretrial Preparation
12/28/2024	Mark Johnson	0.4	\$1,150	\$460	review D proposed jury instructions on full and equal access and case authorities re same; emails to GBW re same.	Trial and Pretrial Preparation
12/29/2024	Guy Wallace	1.2	\$1,350	\$1,620	review and analysis of draft letter from GG to Plaintiffs; revise and edit same; com's with MTJ re same and revised version of Defendants' injunctive relief term sheet prepared by GG and JY	Settlement
12/29/2024	Guy Wallace	2.6	\$1,350	\$3,510	preparation and drafting of amended version of MIL #4	Trial and Pretrial Preparation
12/29/2024	Guy Wallace	0.8	\$1,350	\$1,080	revise and edit Plaintiffs' revised draft MIL's numbers 2 and 5	Trial and Pretrial Preparation
12/29/2024	Mark Johnson	0.6	\$1,150	\$690	calls w/ GBW re draft settlement counter demand and settlement ltr to clients.	Settlement
12/30/2024	Guy Wallace	0.7	\$1,350	\$945	zoom with GG; JY re issues re Algarne and approach to settlement issues	Settlement
12/30/2024	Guy Wallace	0.9	\$1,350	\$1,215	com's with MTJ re settlement; analysis of posture	Settlement
12/30/2024	Guy Wallace	0.8	\$1,350	\$1,080	revise and edit draft revised version of MIL number 1 re public accommodation, due process and Defendants' proposed expert testimony re same	Trial and Pretrial Preparation
12/30/2024	Guy Wallace	0.9	\$1,350	\$1,215	preparation and drafting of revised version of MIL number 4	Trial and Pretrial Preparation
12/30/2024	Guy Wallace	1.6	\$1,350	\$2,160	revise and edit draft of further version of MIL #4	Trial and Pretrial Preparation
12/30/2024	Guy Wallace	0.9	\$1,350	\$1,215	com's with BU re motions in limine; issue of requirement for 5% of ADAAG compliant rooms vs. 50%; review and analysis of draft special verdict form re same	Trial and Pretrial Preparation
12/30/2024	Guy Wallace	0.5	\$1,350	\$675	revise and edit further draft of MIL #2	Trial and Pretrial Preparation
12/30/2024	Guy Wallace	0.5	\$1,350	\$675	revise and edit special verdict form; question re nature of Brookhurst facility and ADAAG section 6.1	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
12/30/2024	Mark Johnson	0.6	\$1,150	\$690	call w/ GBW re settlement outlook and strategy.	Settlement
12/30/2024	Rachel Steyer	0.3	\$750	\$225	reviewing draft GBW MIL re Algarme settlement	Trial and Pretrial Preparation
12/30/2024	Rachel Steyer	0.3	\$750	\$225	reviewing additional MILs circulated by JSY	Trial and Pretrial Preparation
12/30/2024	Rachel Steyer	0.2	\$750	\$150	reviewing defendants' revised exhibit list	Trial and Pretrial Preparation
12/31/2024	Guy Wallace	0.5	\$1,350	\$675	revise and edit Plaintiffs' special verdict form; com's with GG; JY; MTJ re same	Trial and Pretrial Preparation
12/31/2024	Guy Wallace	1.2	\$1,350	\$1,620	com's with MTJ re Algarme and standing issues; revise and edit opposition re re-opening discovery re Algarme medical records; com's with GG; JY; BU; MTJ re same	Trial and Pretrial Preparation
12/31/2024	Mark Johnson	0.3	\$1,150	\$345	review draft opposition to mtn to re-open discovery; email re same	Other Motions
12/31/2024	Mark Johnson	0.9	\$1,150	\$1,035	Calls w GBW re settlement issues and strategy.	Settlement
12/31/2024	Rachel Steyer	0.2	\$750	\$150	reviewing draft depo/rog/exhibit list objections circulated by JSY	Trial and Pretrial Preparation
12/31/2024	Rachel Steyer	0.7	\$750	\$525	reviewing defendants' revisions to joint statement of case, jury instructions, witness list, pretrial statement	Trial and Pretrial Preparation
1/1/2025	Guy Wallace	0.4	\$1,350	\$540	com's with MTJ re deposition of Leisure; trial preparation	Trial and Pretrial Preparation
1/2/2025	Guy Wallace	2.8	\$1,350	\$3,780	review and analysis of email from MJ Spero re further settlement conference statement; com's with GG; JY; MTJ re same; preparation and drafting of same; revise and edit same	Settlement
1/2/2025	Guy Wallace	0.4	\$1,350	\$540	zoom with Vallette; GG re status of settlement discussions	Settlement
1/2/2025	Guy Wallace	0.5	\$1,350	\$675	zoom with Algarme; GG; JY; re status of settlement discussions; visit to Brookdale	Settlement
1/2/2025	Guy Wallace	0.4	\$1,350	\$540	zoom with Pat Lindstrom; GG; JY re status of settlement discussions	Settlement

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/2/2025	Guy Wallace	1.4	\$1,350	\$1,890	legal research and analysis re Defendants' demand for stipulated facts; Old Chief and similar Ninth Circuit cases; com's with AS; TCC re same	Trial and Pretrial Preparation
1/2/2025	Guy Wallace	2.7	\$1,350	\$3,645	review and analysis of Defendants' revised proposed jury instructions; preparation of one page responses re disputed instructions; com's with MTJ; TCC re same (.4)	Trial and Pretrial Preparation
1/2/2025	Guy Wallace	0.9	\$1,350	\$1,215	preparation of one page statements re disputed jury instructions	Trial and Pretrial Preparation
1/2/2025	Mark Johnson	0.1	\$1,150	\$115	review Stebner email re call w/ Tom Goodwin	Settlement
1/2/2025	Mark Johnson	0.3	\$1,150	\$345	Zoom call w/ Heather Fischer, Gay, Jenny re settlement issues, possible allocation of any monetary award.	Settlement
1/2/2025	Mark Johnson	0.3	\$1,150	\$345	zoom call w/ Ralph and Joanie Carlson, Gay Grunfeld and Jenny Yelin re settlement issues, possible allocation of potential damages, trial and settlement conference.	Settlement
1/2/2025	Travis Close	1.6	\$850	\$1,360	Review and analyze definition of "legitimate safety requirements" under DOT regulations and relevant case law	Trial and Pretrial Preparation
1/2/2025	Travis Close	1.5	\$850	\$1,275	Revisions to one-page statement in support of disputed instruction No. 63 (transfer requirement)	Trial and Pretrial Preparation
1/2/2025	Travis Close	1.4	\$850	\$1,190	Legal research re: civil cases citing Old Chief & US v. Pineta for proposition that plaintiffs are entitled to present best version of evidence at trial	Trial and Pretrial Preparation
1/2/2025	Travis Close	0.3	\$850	\$255	Review and analyze def's second revised witness list & joint neutral statement	Trial and Pretrial Preparation
1/2/2025	Travis Close	0.7	\$850	\$595	Review and analyze revised pretrial statement with Def's and Pltf's latest edits	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/2/2025	Travis Close	0.7	\$850	\$595	Review and analyze Def's latest revisions to proposed jury instructions	Trial and Pretrial Preparation
1/2/2025	Travis Close	0.3	\$850	\$255	Review and analyze most recent complaint investigation reports at Brookhurst facility	Trial and Pretrial Preparation
1/2/2025	Travis Close	0.2	\$850	\$170	Review and analyze draft revised motion in limine re: Def's affirmative defenses	Trial and Pretrial Preparation
1/2/2025	Travis Close	0.2	\$850	\$170	Review and analyze revised motion in limine re: FSP safety concerns	Trial and Pretrial Preparation
1/2/2025	Travis Close	0.3	\$850	\$255	Review and analyze final version of objections to def's depo/discovery designations with RLS additions incorporated	Trial and Pretrial Preparation
1/3/2025	Guy Wallace	3.3	\$1,350	\$4,455	preparation and drafting of statements re jury instructions	Trial and Pretrial Preparation
1/3/2025	Guy Wallace	1.3	\$1,350	\$1,755	review and analysis of Defendants' new jury instruction re remedial measures; new MIL re same; com's with JY; MTJ; TCC re same (.5)	Trial and Pretrial Preparation
1/3/2025	Guy Wallace	2.7	\$1,350	\$3,645	review and analysis of Defendants' proposed special verdict form; revise and edit Plaintiffs' proposed special verdict form; preparation of Plaintiffs' draft statement re verdict forms	Trial and Pretrial Preparation
1/3/2025	Guy Wallace	2.6	\$1,350	\$3,510	preparation and drafting of Plaintiffs' one page statements re disputed jury instructions; revise and edit same; review and analysis of proposed jury instructions	Trial and Pretrial Preparation
1/3/2025	Guy Wallace	1.1	\$1,350	\$1,485	zoom with GG; JY; AS; MEC; KS; BU; MTJ; TCC; RLS re trial preparation, including witnesses, jury instructions, Defendants' motion for a bench trial; depositions; settlement	Trial and Pretrial Preparation
1/3/2025	Mark Johnson	0.8	\$1,150	\$920	prep for 3 p.m. meet and confer w/ OC re document requests	Discovery (Non-Deposition)

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/3/2025	Mark Johnson	0.4	\$1,150	\$460	Zoom call with Stacy Stiner and Gay Grunfeld re settlement issues, possible allocation on any damages award	Settlement
1/3/2025	Mark Johnson	0.5	\$1,150	\$575	zoom call w/ Michelle Lytle, Gay Grunfeld re settlement and possible allocation of potential damages	Settlement
1/3/2025	Mark Johnson	0.5	\$1,150	\$575	zoom conference w/ Bernie Jestrabek Hart and COC Grunfeld and Yelin re settlement issues and proposed allocation of any potential damages	Settlement
1/3/2025	Mark Johnson	1.2	\$1,150	\$1,380	Zoom team mtg re trial prep, pretrial filings, meeting and conferring with opposing counsel.	Trial and Pretrial Preparation
1/3/2025	Mark Johnson	0.4	\$1,150	\$460	review proposed one page arguments on disputed jury instructions, com w/ GBW re same..	Trial and Pretrial Preparation
1/3/2025	Mark Johnson	0.2	\$1,150	\$230	review and draft responsive email re Ds remedial measures MIL and instruction and position to take re same.	Trial and Pretrial Preparation
1/3/2025	Mark Johnson	0.8	\$1,150	\$920	calls w/ GBW re trial strategy, written positions on disputed instructions, pre-trial statement, settlement position and strategy.	Trial and Pretrial Preparation
1/3/2025	Mark Johnson	0.1	\$1,150	\$115	review and comment on GBW draft of argument re special verdict form	Trial and Pretrial Preparation
1/3/2025	Mark Johnson	0.3	\$1,150	\$345	draft narrative description of possible stipulations re ADAAG violations; email to COC re same.	Trial and Pretrial Preparation
1/3/2025	Rachel Steyer	1.2	\$750	\$900	weekly meeting with RBGG, GBW, MTJ, TCC, JUB, BSU to discuss tasks and assignments	Case Organization, Planning and Strategy
1/3/2025	Rachel Steyer	0.8	\$750	\$600	reviewing Raymond Leisure docs/emails in prep for upcoming depo	Depositions
1/3/2025	Rachel Steyer	0.2	\$750	\$150	locating residency agreement for declarant witness, circulating to team	Misc. Research

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/3/2025	Rachel Steyer	0.3	\$750	\$225	reviewing MTJ portions of revised one page disputed jury instructions	Trial and Pretrial Preparation
1/3/2025	Rachel Steyer	0.4	\$750	\$300	reviewing defendants' MILs	Trial and Pretrial Preparation
1/3/2025	Rachel Steyer	0.3	\$750	\$225	reviewing GBW revised disputed jury instructions	Trial and Pretrial Preparation
1/3/2025	Rachel Steyer	0.2	\$750	\$150	attempted to reach witnesses, left VMs	Trial and Pretrial Preparation
1/3/2025	Rachel Steyer	0.2	\$750	\$150	call with Debbie Stinson to review and confirm upcoming trial logistics	Trial and Pretrial Preparation
1/3/2025	Rachel Steyer	0.2	\$750	\$150	call with Christopher Gail to review and confirm trial dates	Trial and Pretrial Preparation
1/3/2025	Rachel Steyer	1.1	\$750	\$825	preparing chart and notes analyzing declarants and potential witnesses for deposition	Trial and Pretrial Preparation
1/3/2025	Rachel Steyer	0.2	\$750	\$150	preparing email to trial team circulating witness analysis chart and accompanying declarations and intake notes	Trial and Pretrial Preparation
1/3/2025	Rachel Steyer	0.3	\$750	\$225	reviewing defendants' additional/disputed jury instructions	Trial and Pretrial Preparation
1/3/2025	Travis Close	1.4	\$850	\$1,190	Legal research on cases interpreting California evidence code section 356 to cover photographic evidence	Trial and Pretrial Preparation
1/3/2025	Travis Close	0.2	\$850	\$170	Review and analyze updated one-page responses to disputed jury instructions	Trial and Pretrial Preparation
1/3/2025	Travis Close	1.1	\$850	\$935	Team meeting with GBW, MTJ, RLS, and co-counsel re: pretrial statement, objections to depo designations, witness preparation, trial exhibits, etc.	Trial and Pretrial Preparation
1/3/2025	Travis Close	0.3	\$850	\$255	Call with GBW re: responding to jury instructions re subsequent remedial measures	Trial and Pretrial Preparation
1/3/2025	Travis Close	1.5	\$850	\$1,275	Legal research re: subsequent remedial measures in context of illegal policy	Trial and Pretrial Preparation
1/3/2025	Travis Close	1.6	\$850	\$1,360	Draft proposed competing jury instruction & one-page statement re: subsequent remedial measures	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/4/2025	Guy Wallace	1.7	\$1,350	\$2,295	review and analysis of draft of joint pretrial conference statements; revise and edit same	Trial and Pretrial Preparation
1/4/2025	Guy Wallace	0.7	\$1,350	\$945	review and analysis of further edits to joint pretrial statement from GG; com's with GG; JY; MTJ re same	Trial and Pretrial Preparation
1/4/2025	Guy Wallace	0.5	\$1,350	\$675	review and analysis of Defendants' draft statements re jury instructions	Trial and Pretrial Preparation
1/4/2025	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW re draft pre-trial statement and undisputed access barriers, stipulation re same and proposed stipulation on change in FSP policy.	Trial and Pretrial Preparation
1/4/2025	Travis Close	0.4	\$850	\$340	Prepare further versions of exhibit lists and discovery designations for plaintiffs' responses and send to RLS for assignment review	Trial and Pretrial Preparation
1/4/2025	Travis Close	3.7	\$850	\$3,145	Draft responses to Def's objections to revised exhibit list	Trial and Pretrial Preparation
1/5/2025	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of draft opposition to Defendants' motion re bench trial; com's with GG; MEC; MTJ re same	Other Motions
1/5/2025	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of draft jury instruction re subsequent remedial measures; one page statement re same; com's with MTJ re same; legal research and analysis re same	Trial and Pretrial Preparation
1/5/2025	Mark Johnson	0.3	\$1,150	\$345	review emails pulled by RLS for Ray Leisure depo	Depositions
1/5/2025	Mark Johnson	1.7	\$1,150	\$1,955	research and prep for R Leisure depo, start outline, coms w/ COC re potential exhibits	Depositions
1/5/2025	Mark Johnson	0.7	\$1,150	\$805	review draft opposition to mtn for bench trial, draft email w/ comments, proposed revisions re same.	Other Motions
1/5/2025	Mark Johnson	0.4	\$1,150	\$460	call from GBW re settlement conference scenarios and strategy	Settlement
1/5/2025	Mark Johnson	0.1	\$1,150	\$115	call w/ GBW re meeting and conferring w/ OC, opposition to mtn for bench trial	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/5/2025	Mark Johnson	1.8	\$1,150	\$2,070	Legal research re Rule of Evidence 407 and exclusion of subsequent remediation and exceptions to exclusion for jury instruction and argument re same.	Trial and Pretrial Preparation
1/5/2025	Mark Johnson	1.6	\$1,150	\$1,840	draft jury instruction and argument iso same re subsequent remediaton	Trial and Pretrial Preparation
1/5/2025	Mark Johnson	0.3	\$1,150	\$345	call w/ GBW re direct threat and mootness issues, jury instructions related to same and court's decision on summary judgment	Trial and Pretrial Preparation
1/5/2025	Rachel Steyer	2.3	\$750	\$1,725	reviewing and updating depo designations and exhibit list objections	Trial and Pretrial Preparation
1/5/2025	Rachel Steyer	0.2	\$750	\$150	call with TCC re reviewing depo designations	Trial and Pretrial Preparation
1/5/2025	Travis Close	3.7	\$850	\$3,145	Draft revisions to plaintiffs' responses re: discovery designations	Trial and Pretrial Preparation
1/6/2025	Guy Wallace	0.4	\$1,350	\$540	review and analysis of draft opposition to Defendants' motion for bench trial	Other Motions
1/6/2025	Guy Wallace	1.4	\$1,350	\$1,890	meet and confer with ER; Bertino; Jacobsen; Moore; GG; JY; MTJ re joint pretrial statement and pretrial submissions	Trial and Pretrial Preparation
1/6/2025	Guy Wallace	0.9	\$1,350	\$1,215	zoom with GG; JY; BU; MTJ; TCC re preparation for meet and confer with Defendants; Exhibit A	Trial and Pretrial Preparation
1/6/2025	Mark Johnson	0.8	\$1,150	\$920	video conference w/ GBW, GCG, JY, TCC re prep for 3 p.m. meet and confer, pretrial filings for Wednesday.	Trial and Pretrial Preparation
1/6/2025	Mark Johnson	1.5	\$1,150	\$1,725	video conference w/ OC Rutner, Moore, Jacobsen, Bertino and COC Grunfeld, Wallace, Umpierre, Yelin re issues in pre-trial statement, disputed and undisputed facts, stipulation re ADAAG violations	Trial and Pretrial Preparation
1/6/2025	Mark Johnson	4.7	\$1,150	\$5,405	work on integration of competing jury instructions and parties one-page arguments in support of or opposition to same	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/6/2025	Rachel Steyer	0.7	\$750	\$525	ongoing review of documents and online research for Raymond Leisure depo	Depositions
1/6/2025	Rachel Steyer	2.5	\$750	\$1,875	reviewing and responding to depo designation objections	Trial and Pretrial Preparation
1/6/2025	Rachel Steyer	0.4	\$750	\$300	zoom with GCG, TCC, JSY re Brookhurst demonstratives and objection responses to exhibit list	Trial and Pretrial Preparation
1/6/2025	Rachel Steyer	0.8	\$750	\$600	correcting and fixing Brookhurst barriers for Exhibit A	Trial and Pretrial Preparation
1/6/2025	Travis Close	0.4	\$850	\$340	Meeting with RLS and JY re: revisions to exhibit list objections/responses and depo designation objections/responses	Trial and Pretrial Preparation
1/6/2025	Travis Close	0.8	\$850	\$680	Meeting with GG, MTJ, BMU, and GBW re strategy before meet and confer with defendants this afternoon; upcoming class member depositions, and edits to demonstratives	Trial and Pretrial Preparation
1/6/2025	Travis Close	2.7	\$850	\$2,295	Further revisions to objections/responses to discovery designations (pages 35-55)	Trial and Pretrial Preparation
1/6/2025	Travis Close	0.7	\$850	\$595	Legal research whether "objection to form" is sufficient to preserve objections at deposition	Trial and Pretrial Preparation
1/6/2025	Travis Close	1.3	\$850	\$1,105	Further revisions to spreadsheet of exhibit objections/responses	Trial and Pretrial Preparation
1/6/2025	Travis Close	0.7	\$850	\$595	Further revisions to discovery designations objections/responses	Trial and Pretrial Preparation
1/7/2025	Guy Wallace	8.8	\$1,350	\$11,880	prepare for and participate in Settlement Conference with MJ Spero	Settlement
1/7/2025	Guy Wallace	0.9	\$1,350	\$1,215	com's with Waters; MTJ re results of settlement conference; analysis of requirements of 2010 ADAS as applied to potential Brookhurst work	Settlement
1/7/2025	Guy Wallace	0.4	\$1,350	\$540	com's with GG; MTJ re Algarne visit to Brookhurst facility	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/7/2025	Mark Johnson	7.0	\$1,150	\$8,050	Settlement conference w/ Judge Spero, Wallace, Grunfeld, Yelin, Umpierre	Settlement
1/7/2025	Mark Johnson	0.5	\$1,150	\$575	calls w/ GBW (x3) re follow up from settlement conference, issues related to tentative agreement on certain components of agreement.	Settlement
1/7/2025	Mark Johnson	1.3	\$1,150	\$1,495	further revisions and additions to combined draft jury instructions; review D's proposed revisions to 2 instructions.	Trial and Pretrial Preparation
1/7/2025	Mark Johnson	1.2	\$1,150	\$1,380	further revisions to combined revised jury instructions, incorporating revised instructions from OC and adjusting arguments re same; draft email to OC re edits and outstanding issues.	Trial and Pretrial Preparation
1/7/2025	Mark Johnson	0.1	\$1,150	\$115	coms w/ COC GCG re Algame visit to Brookhurst	Trial and Pretrial Preparation
1/7/2025	Rachel Steyer	0.2	\$750	\$150	call with Jim Marshman to review depo and trial logistics/testimony	Trial and Pretrial Preparation
1/7/2025	Rachel Steyer	0.2	\$750	\$150	providing witness addresses for subpoenas	Trial and Pretrial Preparation
1/7/2025	Rachel Steyer	0.2	\$750	\$150	email to TCC and JSY re depo designations	Trial and Pretrial Preparation
1/7/2025	Rachel Steyer	0.6	\$750	\$450	reviewing plaintiffs' draft opposition to defendants' MILs	Trial and Pretrial Preparation
1/7/2025	Travis Close	0.2	\$850	\$170	Call with MTJ re: scope of injunctive relief for emergency evacuation injunction	Settlement
1/7/2025	Travis Close	0.8	\$850	\$680	Review and analyze recently proposed revisions to disputed jury instructions offered by Pltfs/Def's	Trial and Pretrial Preparation
1/7/2025	Travis Close	0.2	\$850	\$170	Email to RLS re: revisions to exhibit list & discovery designations (objections/responses)	Trial and Pretrial Preparation
1/7/2025	Travis Close	2.7	\$850	\$2,295	Review and analyze further revisions to exhibit spreadsheet responses by RLS; make further revisions	Trial and Pretrial Preparation
1/7/2025	Travis Close	0.2	\$850	\$170	Email to RBGG re: latest version of trial exhibit spreadsheet	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/7/2025	Travis Close	0.6	\$850	\$510	Draft email to Doug Cross re: updates to case and materials to review before next week's pretrial conference	Trial and Pretrial Preparation
1/7/2025	Travis Close	0.6	\$850	\$510	Review and analyze Dfts' motion for bench trial and Pltfs' opposition re same	Trial and Pretrial Preparation
1/7/2025	Travis Close	0.4	\$850	\$340	Review and analyze Def's motion to reopen discovery and Pltf's opposition	Trial and Pretrial Preparation
1/7/2025	Travis Close	1.8	\$850	\$1,530	Additional revisions to Pltfs' discovery designations objections/responses, incorporating edits by RLS and additional edits	Trial and Pretrial Preparation
1/7/2025	Travis Close	0.2	\$850	\$170	Email to team re: additional edits to discovery designations objections/responses	Trial and Pretrial Preparation
1/7/2025	Travis Close	0.2	\$850	\$170	Email to KS (co-counsel) re: ordering of trial exhibits	Trial and Pretrial Preparation
1/7/2025	Travis Close	0.2	\$850	\$170	Review and analyze memo re: script for Brookhurst visit	Trial and Pretrial Preparation
1/8/2025	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of MIL oppositions; com's with AS; BU; MTJ re same	Trial and Pretrial Preparation
1/8/2025	Guy Wallace	1.8	\$1,350	\$2,430	review and analysis of Defendants' revised version of pretrial statement; com's with MTJ re same (.6)	Trial and Pretrial Preparation
1/8/2025	Guy Wallace	0.8	\$1,350	\$1,080	com's with GG; JY; MTJ re Defendants' revisions to pretrial statement & responses thereto; special verdict form; proposed jury instructions	Trial and Pretrial Preparation
1/8/2025	Guy Wallace	1.7	\$1,350	\$2,295	preparation and drafting of further points for pretrial statement re Defendants' "stipulation" argument re ADAAG compliance; CBC as the standard for current alterations or repairs	Trial and Pretrial Preparation
1/8/2025	Guy Wallace	0.7	\$1,350	\$945	revise and edit Plaintiffs' proposed special verdict form; review and analysis of Defendants' revised proposed special verdict form	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/8/2025	Guy Wallace	0.8	\$1,350	\$1,080	com's with MTJ re additional proposed jury instructions; revise and edit same	Trial and Pretrial Preparation
1/8/2025	Guy Wallace	3.3	\$1,350	\$4,455	review and analysis of further draft of the parties jury instructions and statements re same; revise and edit same; com's with MTJ re same (.8)	Trial and Pretrial Preparation
1/8/2025	Guy Wallace	1.9	\$1,350	\$2,565	revise and edit final draft of proposed jury instructions and statements re same	Trial and Pretrial Preparation
1/8/2025	Mark Johnson	1.0	\$1,150	\$1,150	review docs for Leisure deposition; coms w/ RLS re potential exhibits or background information; work on outline for depo	Depositions
1/8/2025	Mark Johnson	0.8	\$1,150	\$920	review draft opp to mtn in limine re remedial measures; edit same and com w/ coc re same.	Other Motions
1/8/2025	Mark Johnson	1.1	\$1,150	\$1,265	work on additional edits to combined jury instructions with D revisions and comments re same; email to Ds re same.	Trial and Pretrial Preparation
1/8/2025	Mark Johnson	1.0	\$1,150	\$1,150	zoom call with Yelin, Grunfeld, Wallace to review issues raised by D's proposed revisions to pre-trial statements.	Trial and Pretrial Preparation
1/8/2025	Mark Johnson	0.5	\$1,150	\$575	draft 3 additional or replacement jury instructions; coms w/ COC re same; email to OC with same.	Trial and Pretrial Preparation
1/8/2025	Mark Johnson	1.4	\$1,150	\$1,610	review revised pre-trial statement from OC and list of issues from JY to discuss / resolve re pre-trial statement and prep for call.	Trial and Pretrial Preparation
1/8/2025	Mark Johnson	3.8	\$1,150	\$4,370	work on further revisions to combined jury instructions based on revisions and additions from OC; calls w/ GBW, GCG and JY re same.	Trial and Pretrial Preparation
1/8/2025	Mark Johnson	0.8	\$1,150	\$920	final review and edit of combined revised proposed jury instructions, make formatting changes and com w/ GBW, OC re same	Trial and Pretrial Preparation
1/8/2025	Mark Johnson	0.5	\$1,150	\$575	call w/ GBW re jury instructions	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/8/2025	Mark Johnson	0.5	\$1,150	\$575	call w/ GBW re pre-trial statement	Trial and Pretrial Preparation
1/8/2025	Rachel Steyer	0.2	\$750	\$150	reviewing correspondence between JSY and OC re finalizing revised pre-trial statement docs	Communications With Opposing Counsel
1/8/2025	Rachel Steyer	3.6	\$750	\$2,700	reviewing and gather additional docs for Leisure depo	Depositions
1/8/2025	Rachel Steyer	1.1	\$750	\$825	reviewing updated draft of proposed jury instructions	Trial and Pretrial Preparation
1/8/2025	Rachel Steyer	0.2	\$750	\$150	reviewing AS draft opposition to MIL	Trial and Pretrial Preparation
1/8/2025	Rachel Steyer	0.7	\$750	\$525	reviewing defendants' opposition to plaintiffs' MILs	Trial and Pretrial Preparation
1/8/2025	Travis Close	0.4	\$850	\$340	Review and analyze revised combined jury instructions, including disputed instructions and comments for each re: resolution	Trial and Pretrial Preparation
1/8/2025	Travis Close	0.2	\$850	\$170	Review and analyze draft opposition to motion in limine seeking to exclude evidence of the elimination of the former FSP	Trial and Pretrial Preparation
1/8/2025	Travis Close	0.3	\$850	\$255	Review and analyze latest drafts of combined witness lists and joint neutral statement	Trial and Pretrial Preparation
1/8/2025	Travis Close	0.7	\$850	\$595	Review and analyze Defendants' further revisions to jury instructions	Trial and Pretrial Preparation
1/8/2025	Travis Close	1.7	\$850	\$1,445	Legal research on burden on proof necessary for facts that are stipulated to at trial	Trial and Pretrial Preparation
1/8/2025	Travis Close	1.6	\$850	\$1,360	Legal research re: additional cases to support public accommodation jury instruction	Trial and Pretrial Preparation
1/8/2025	Travis Close	1.4	\$850	\$1,190	Legal research re: additional cases to cite iso plaintiffs' disputed instruction re: claims/defenses of the Brookhurst subclass	Trial and Pretrial Preparation
1/8/2025	Travis Close	0.2	\$850	\$170	Review and analyze amended joint neutral statement of case (as filed)	Trial and Pretrial Preparation
1/8/2025	Travis Close	1.1	\$850	\$935	Review and analyze Defnts' revised exhibit list with responses to objections	Trial and Pretrial Preparation
1/9/2025	Guy Wallace	2.4	\$1,350	\$3,240	preparation of topics and questions for the Leisure depo; com's with MTJ; BU re same (.5)	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/9/2025	Mark Johnson	9.6	\$1,150	\$11,040	prep for Leisure depo; review docs and ID exhibits for same, coms w/ GBW and BU re same, finalize outline.	Depositions
1/9/2025	Rachel Steyer	0.6	\$750	\$450	further follow up call with Christopher Gail re potential depo	Depositions
1/9/2025	Rachel Steyer	0.4	\$750	\$300	email to trial team recapping calls with potential alternative deponents	Depositions
1/9/2025	Rachel Steyer	0.3	\$750	\$225	call with Bill Novickas re potential depo testimony	Depositions
1/9/2025	Rachel Steyer	1.2	\$750	\$900	further review of documents for Leisure depo	Depositions
1/9/2025	Rachel Steyer	0.2	\$750	\$150	call with Clarence Alvey to review and confirm trial dates	Trial and Pretrial Preparation
1/9/2025	Rachel Steyer	0.2	\$750	\$150	call with Christopher Gail confirming and reviewing trial dates	Trial and Pretrial Preparation
1/9/2025	Rachel Steyer	0.2	\$750	\$150	call with Bill Novickas re trial testimony and logistics	Trial and Pretrial Preparation
1/9/2025	Rachel Steyer	0.2	\$750	\$150	call with Thomas Weinrick reviewing and confirming trial logistics and testimony	Trial and Pretrial Preparation
1/9/2025	Rachel Steyer	0.2	\$750	\$150	call with Jim Marshman to review and discuss trial testimony dates, depo logistics	Trial and Pretrial Preparation
1/9/2025	Rachel Steyer	0.2	\$750	\$150	reviewing Algarme video	Trial and Pretrial Preparation
1/9/2025	Travis Close	0.2	\$850	\$170	Review and analyze proposed special verdict form and statement in support of same	Trial and Pretrial Preparation
1/9/2025	Travis Close	0.2	\$850	\$170	Review and analyze Dfts' proposed special verdict form and statement in support of same	Trial and Pretrial Preparation
1/9/2025	Travis Close	0.5	\$850	\$425	Review and analyze final preconference trial statement (as filed)	Trial and Pretrial Preparation
1/9/2025	Travis Close	0.4	\$850	\$340	Review and analyze proposed jury instructions (as filed)	Trial and Pretrial Preparation
1/9/2025	Travis Close	0.2	\$850	\$170	Review and analyze opposition to Motion in limine re: 2017 letter	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/9/2025	Travis Close	0.2	\$850	\$170	Review and analyze opposition to Def's MIL re: supplemental expert reports from Gary Waters and Jeff Mastin	Trial and Pretrial Preparation
1/9/2025	Travis Close	0.3	\$850	\$255	Review and analyze notes from RLS re: expected testimony from class members/residents to be produced at deposition	Trial and Pretrial Preparation
1/9/2025	Travis Close	0.2	\$850	\$170	Review and analyze photos and videos from Algarme facility visit	Trial and Pretrial Preparation
1/9/2025	Travis Close	1.6	\$850	\$1,360	Draft additional trial demonstratives re: fleet safety policy (common securement devices)	Trial and Pretrial Preparation
1/9/2025	Travis Close	1.8	\$850	\$1,530	Draft additional trial demonstratives re: fleet safety policy (WC-19 certified powerchair devices)	Trial and Pretrial Preparation
1/9/2025	Travis Close	1.5	\$850	\$1,275	Draft additional trial demonstratives re: fleet safety policy (types of powerchairs, electric wheelchairs, scooters)	Trial and Pretrial Preparation
1/9/2025	Travis Close	0.6	\$850	\$510	Edits to FSP trial demonstratives (map of complaints)	Trial and Pretrial Preparation
1/10/2025	Guy Wallace	0.8	\$1,350	\$1,080	com's with GG; JY; BU re settlement and further responses to Goodwin re same	Settlement
1/10/2025	Guy Wallace	1.4	\$1,350	\$1,890	com's with GG; JY; AS; MEC; BU; JAU; TCC; RLS re preparation for pretrial conference; trial preparation tasks	Trial and Pretrial Preparation
1/10/2025	Jennifer Bybee	0.8	\$925	\$740	Zoom meeting with co-counsel re trial preparation	Trial and Pretrial Preparation
1/10/2025	Mark Johnson	0.3	\$1,150	\$345	update GBW re Leisure depo during break	Case Organization, Planning and Strategy
1/10/2025	Mark Johnson	6.4	\$1,150	\$7,360	deposition of Ray Leisure	Depositions
1/10/2025	Mark Johnson	1.3	\$1,150	\$1,495	final prep for Ray Leisure depo and review notes/exhibits during breaks	Depositions
1/10/2025	Rachel Steyer	0.7	\$750	\$525	weekly meeting with RBGG co-counsel, BSU, GBW, TCC, JUB to discuss tasks and assignments	Case Organization, Planning and Strategy
1/10/2025	Rachel Steyer	0.4	\$750	\$300	reviewing MTJ Leisure depo outline	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/10/2025	Rachel Steyer	0.4	\$750	\$300	reviewing defendants' opposition re jury trial	Other Motions
1/10/2025	Travis Close	0.9	\$850	\$765	Review, analyze and propose additions to draft deposition outline re: Ray Leisure	Depositions
1/10/2025	Travis Close	0.8	\$850	\$680	Meeting with MTJ, GBW, RLS, and co-counsel re: trial preparation, motion for bench trial, demonstratives, witness preparation	Trial and Pretrial Preparation
1/10/2025	Travis Close	0.2	\$850	\$170	Review and analyze def's reply iso motion for bench trial	Trial and Pretrial Preparation
1/10/2025	Travis Close	0.3	\$850	\$255	Email to AS, JUB re: scheduling times for next meeting re: demonstratives	Trial and Pretrial Preparation
1/10/2025	Travis Close	1.6	\$850	\$1,360	Review and analyze exhibits from depositions of Cross, Johnson, Bowman for potential additional demonstratives re FSP	Trial and Pretrial Preparation
1/10/2025	Travis Close	1.5	\$850	\$1,275	Review and analyze depo transcripts of Johnson, Cross for additional language to use in FSP demonstratives	Trial and Pretrial Preparation
1/10/2025	Travis Close	1.3	\$850	\$1,105	Review and analyze depo transcripts of plaintiffs (Jestrabek-Hart, Algarme, Stiner) for additional language to use in FSP demonstratives	Trial and Pretrial Preparation
1/10/2025	Travis Close	0.7	\$850	\$595	Analyze exhibits cited in Cross & Barchuk Rule 26 reports for additional demonstratives for FSP slides	Trial and Pretrial Preparation
1/12/2025	Guy Wallace	0.7	\$1,350	\$945	review and analysis of draft of injunctive relief term sheet from JY	Settlement
1/12/2025	Guy Wallace	2.8	\$1,350	\$3,780	review and analysis of elements of Plaintiffs' ADA claims; proof of same for Plaintiffs' case in chief; preparation for pretrial conference	Trial and Pretrial Preparation
1/12/2025	Guy Wallace	1.7	\$1,350	\$2,295	review and analysis of proof of Plaintiffs' elements of ADA claims; analysis of Defendants' defenses and proof re same	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/12/2025	Guy Wallace	0.7	\$1,350	\$945	com's with GG; MTJ re Algarme standing; analysis of proof issues re same and potential motion practice	Trial and Pretrial Preparation
1/12/2025	Mark Johnson	0.6	\$1,150	\$690	calls w/ GBW re demonstratives, proof at trial, standing issue for Algarme, approaching the Court re same.	Trial and Pretrial Preparation
1/12/2025	Mark Johnson	0.4	\$1,150	\$460	prepare proof chart for trial and partially complete same.	Trial and Pretrial Preparation
1/13/2025	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of draft of IR term sheet; revise and edit same; com's with Waters; MTJ re same	Settlement
1/13/2025	Guy Wallace	1.0	\$1,350	\$1,350	com's with GG; JY; BU; MTJ re revised settlement term sheet re injunctive relief; preparation for pretrial conference; trial preparation re exhibits and witnesses	Trial and Pretrial Preparation
1/13/2025	Guy Wallace	1.2	\$1,350	\$1,620	zoom with GG; JY; AS; MEC; KS; BU; MTJ; JAU; TCC; RLS re preparation for pretrial conference; exhibits; potential trial witnesses	Trial and Pretrial Preparation
1/13/2025	Guy Wallace	1.9	\$1,350	\$2,565	review and analysis of chart from AS re updated demonstratives; revise and edit same; com's with MTJ; JAU re same (.4)	Trial and Pretrial Preparation
1/13/2025	Guy Wallace	0.5	\$1,350	\$675	review and analysis of issues to address at pretrial conference from GG	Trial and Pretrial Preparation
1/13/2025	Jennifer Bybee	0.8	\$925	\$740	Zoom call with TCC and A. Spiegel re demonstrative updates	Trial and Pretrial Preparation
1/13/2025	Jennifer Bybee	0.5	\$925	\$463	Update chart of demonstratives with text to be added for Room 103	Trial and Pretrial Preparation
1/13/2025	Jennifer Bybee	1.2	\$925	\$1,110	Zoom call with co-counsel re witness list and trial preparation	Trial and Pretrial Preparation
1/13/2025	Mark Johnson	1.1	\$1,150	\$1,265	team mtg w/ Grunfeld, Wallace, Campbell, Siegal, Close, Edmundson, Stilber, Bybee, Steyer, Umpierre re trial prep, mechanics, witnesses, exhibits, class member depos.	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/13/2025	Mark Johnson	0.2	\$1,150	\$230	call w/ Yelin, Grunfeld, Wallace, Umpierre re Judge Spero meeting and conference w/ OC re settlement	Trial and Pretrial Preparation
1/13/2025	Mark Johnson	0.8	\$1,150	\$920	Zoom call with Wallace, Grunfeld, Yelin and Umpierre re class member depo re verdict form and instruction on standing, tech people for presentation, witness list and availabilty, Marshman depo and D's objections.	Trial and Pretrial Preparation
1/13/2025	Mark Johnson	0.4	\$1,150	\$460	calls w/ GBW re pre-trial conference; jury instructions, Algame standing and demonstratives.	Trial and Pretrial Preparation
1/13/2025	Mark Johnson	0.1	\$1,150	\$115	email exchanges w/ J Mastin re trial.	Trial and Pretrial Preparation
1/13/2025	Rachel Steyer	0.2	\$750	\$150	reviewing revised trial demonstratives list from AS	Trial and Pretrial Preparation
1/13/2025	Rachel Steyer	0.6	\$750	\$450	conducting people research finder for trial witnesses	Trial and Pretrial Preparation
1/13/2025	Rachel Steyer	1.1	\$750	\$825	meeting with trial team (RBGG, GBW, MTJ, TCC, JUB, BSU) to review and discuss tasks and agenda before pre-trial conference	Trial and Pretrial Preparation
1/13/2025	Rachel Steyer	0.2	\$750	\$150	email to GBW describing disabilities of remote witnesses	Trial and Pretrial Preparation
1/13/2025	Travis Close	0.3	\$850	\$255	Review and analyze chart showing edits/additions necessary for demonstratives	Trial and Pretrial Preparation
1/13/2025	Travis Close	0.8	\$850	\$680	Meeting with AS, JUB re: updates to demonstratives	Trial and Pretrial Preparation
1/13/2025	Travis Close	2.4	\$850	\$2,040	Analyze photos of Brookhurst common area & resident-room barriers for additions to demonstratives	Trial and Pretrial Preparation
1/13/2025	Travis Close	1.8	\$850	\$1,530	Analyze WC-18 and WC-19 materials, videos, trainings, instructional guides for creation of additional demonstratives re: safety of wheelchair securement	Trial and Pretrial Preparation
1/13/2025	Travis Close	1.2	\$850	\$1,020	Team meeting re: pretrial conference preparation, witness exams, class member testimony, and exhibit list	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/13/2025	Travis Close	0.7	\$850	\$595	Download, organize and select photos of facility vehicle taken by access experts Waters and Mastin for inclusion in proposed exhibits	Trial and Pretrial Preparation
1/14/2025	Guy Wallace	0.8	\$1,350	\$1,080	com's with Goodwin; ER; Launey; GG; JY; BU; MTJ re settlement --injunctive relief	Settlement
1/14/2025	Guy Wallace	0.5	\$1,350	\$675	review and analysis of Defendants' proposed revisions to term sheet re injunctive relief	Settlement
1/14/2025	Guy Wallace	4.3	\$1,350	\$5,805	preparation for pretrial conference; review and analysis of pretrial conference statement; Defendants' motion for bench trial; MILs; GG memo re issues for pretrial conference	Trial and Pretrial Preparation
1/14/2025	Guy Wallace	1.5	\$1,350	\$2,025	prepare for and participate in pretrial conference	Trial and Pretrial Preparation
1/14/2025	Guy Wallace	0.4	\$1,350	\$540	com's with Chopra; GG; HY; BU; MTJ re questionnaire and selection of additional questions re same	Trial and Pretrial Preparation
1/14/2025	Guy Wallace	0.5	\$1,350	\$675	com's with BU; MTJ; JAU; RLS re results of pretrial conference	Trial and Pretrial Preparation
1/14/2025	Guy Wallace	1.3	\$1,350	\$1,755	com's with Murov; JY; MTJ; JAU re revisions to demonstratives; preparation of further demonstratives	Trial and Pretrial Preparation
1/14/2025	Jennifer Bybee	2.2	\$925	\$2,035	Cross reference Corrected Exhibit A, and demonstratives to determine what needs to be corrected.	Trial and Pretrial Preparation
1/14/2025	Jennifer Bybee	0.3	\$925	\$278	Com's with GBW re demonstratives to create	Trial and Pretrial Preparation
1/14/2025	Jennifer Bybee	0.4	\$925	\$370	Update demonstrative changes chart to reflect GBW input	Trial and Pretrial Preparation
1/14/2025	Jennifer Bybee	0.7	\$925	\$648	Zoom call with co-counsel and D. Murov re updates to demonstratives	Trial and Pretrial Preparation
1/14/2025	Jennifer Bybee	1.2	\$925	\$1,110	Update demonstrative chart and circulate to D. Murov and co-counsel	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/14/2025	Mark Johnson	1.0	\$1,150	\$1,150	pre-trial conference	Case Management Conferences
1/14/2025	Mark Johnson	0.8	\$1,150	\$920	prep for pre-trial conference, including print and review of pre-trial statement, outline for argument, other docs	Case Management Conferences
1/14/2025	Mark Johnson	0.4	\$1,150	\$460	confer w/ COC before pretrial conference	Case Management Conferences
1/14/2025	Mark Johnson	0.3	\$1,150	\$345	call w/ client re trial and settlement update.	Case Organization, Planning and Strategy
1/14/2025	Mark Johnson	1.0	\$1,150	\$1,150	mtg w/ OC after pre-trial conference to discuss settlement	Settlement
1/14/2025	Mark Johnson	0.4	\$1,150	\$460	conference w COC after pre-trial conference re settlement proposals and prep for mtg w/ O'C	Settlement
1/14/2025	Mark Johnson	0.5	\$1,150	\$575	research prior Marquis declarations and findings; draft email to OC proposing stipulation re his proposed testimony.	Trial and Pretrial Preparation
1/14/2025	Mark Johnson	0.2	\$1,150	\$230	review video of Algarme visit to Brookhurst	Trial and Pretrial Preparation
1/14/2025	Mark Johnson	0.7	\$1,150	\$805	Zoom mtg re trial demonstratives.	Trial and Pretrial Preparation
1/14/2025	Mark Johnson	0.2	\$1,150	\$230	call w/ Rita Stiner re status of case, trial, settlement negotiations.	Trial and Pretrial Preparation
1/14/2025	Mark Johnson	0.4	\$1,150	\$460	review and edit list of trial demonstratives with comments	Trial and Pretrial Preparation
1/14/2025	Mark Johnson	1.8	\$1,150	\$2,070	work on Mastin examination and barrier list for same	Trial and Pretrial Preparation
1/14/2025	Mark Johnson	0.1	\$1,150	\$115	com w/ J Mastin re trial appearance and testimony, prep	Trial and Pretrial Preparation
1/14/2025	Rachel Steyer	0.7	\$750	\$525	travel from Millbrae to Oakland to attend pre-trial conference hearing	Trial and Pretrial Preparation
1/14/2025	Rachel Steyer	1.1	\$750	\$825	attended pre-trial conference hearing	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/14/2025	Travis Close	0.7	\$850	\$595	Meet with JUB, GBW, MTJ, AS, JY, and debra munov (consultant) re: revisions to demonstrative slides	Trial and Pretrial Preparation
1/14/2025	Travis Close	0.7	\$850	\$595	Analysis of photos missing from vehicle photo exhibits & brookhurst 2024 photographs	Trial and Pretrial Preparation
1/14/2025	Travis Close	0.7	\$850	\$595	Call to Doug cross re: Def's legitimate safety requirements defense	Trial and Pretrial Preparation
1/14/2025	Travis Close	1.4	\$850	\$1,190	Second pretrial conference with Judge Gilliam	Trial and Pretrial Preparation
1/14/2025	Travis Close	0.7	\$850	\$595	Meet with team before & after pretrial conference	Trial and Pretrial Preparation
1/14/2025	Travis Close	3.5	\$850	\$2,975	Flight from SEA to OAK for pretrial conference, including baggage check/retrieval, security, gate service, boarding	Trial and Pretrial Preparation
1/15/2025	Guy Wallace	1.5	\$1,350	\$2,025	review and analysis of draft declaration re Ms. Algarne's visit to Brookhurst; com's with GG; JY; MTJ re same	Other Motions
1/15/2025	Guy Wallace	1.2	\$1,350	\$1,620	zoom with GG; JY; MTJ re settlement; results of pretrial conference	Settlement
1/15/2025	Guy Wallace	0.4	\$1,350	\$540	com's with Waters re settlement issues and fixes re roll-in showers	Settlement
1/15/2025	Guy Wallace	0.6	\$1,350	\$810	com's with BU re settlement and issues re staffing provisions	Settlement
1/15/2025	Guy Wallace	1.1	\$1,350	\$1,485	com's with MTJ re Defendants' settlement proposals re injunctive relief	Settlement
1/15/2025	Guy Wallace	1.9	\$1,350	\$2,565	review and analysis of Defendants' 8 p.m. term sheet re injunctive relief; com's with GG; JY; Bu; MTJ re potential responses thereto; terms re staffing	Settlement
1/15/2025	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of Defendants' proposals re jury questionnaire; com's with JY re same	Trial and Pretrial Preparation
1/15/2025	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of current demonstratives; com's with JAU re same	Trial and Pretrial Preparation

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/15/2025	Guy Wallace	0.8	\$1,350	\$1,080	analysis of witness list and potential order of call	Trial and Pretrial Preparation
1/15/2025	Jennifer Bybee	1.0	\$925	\$925	Create text and choose photos for new demonstratives	Trial and Pretrial Preparation
1/15/2025	Jennifer Bybee	0.2	\$925	\$185	Com's with D. Murov re answering questions	Trial and Pretrial Preparation
1/15/2025	Mark Johnson	1.4	\$1,150	\$1,610	Zoom call w/ GBW, Yelin, Grunfeld re settlement injunctive relief term sheet - walk through all open / disputed issues	Settlement
1/15/2025	Mark Johnson	0.6	\$1,150	\$690	review and analyze new version of settlement term sheet from defendants.	Settlement
1/15/2025	Mark Johnson	0.3	\$1,150	\$345	review BU proposal for staffing monitoring as part of settlement agreement and explanation for same; email to COC w/ comments re same.	Settlement
1/15/2025	Mark Johnson	0.5	\$1,150	\$575	further call w/ GBW re settlement and strategies for resolving change of ownership issue.	Settlement
1/15/2025	Mark Johnson	0.7	\$1,150	\$805	calls w/ GBW re settlement issues, new term sheet from Ds	Settlement
1/15/2025	Mark Johnson	0.8	\$1,150	\$920	call w/ B Umpierre re development of staffing monitoring provision for settlement agreement term sheet.	Settlement
1/15/2025	Mark Johnson	0.4	\$1,150	\$460	review draft declaration of Jeannete Algarme and draft of supplemental responses to the interrogatories.	Trial and Pretrial Preparation
1/15/2025	Mark Johnson	2.8	\$1,150	\$3,220	draft amended propose jury instruction on standing, draft intro piece and position statement re same, review and incorporate edits from GBW; coms w/ COC re same.	Trial and Pretrial Preparation
1/15/2025	Mark Johnson	0.6	\$1,150	\$690	call w/ GBW re photo exhibits for barriers, presentation of Mastin testimony and exhibits and demonstratives re same, strategy for grouping photos.	Trial and Pretrial Preparation
1/15/2025	Rachel Steyer	0.2	\$750	\$150	email to Christopher Gail and BSU re coordinating depo prep	Depositions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/15/2025	Rachel Steyer	0.2	\$750	\$150	reviewing supplemental ROG response and declaration from Jeanette Algarme re Brookhurst visit	Discovery (Non-Deposition)
1/15/2025	Rachel Steyer	0.8	\$750	\$600	reviewing transcript from pre-trial conference	Trial and Pretrial Preparation
1/15/2025	Travis Close	1.2	\$850	\$1,020	Travel back home from pretrial conference - BART from hotel to SFO	Case Management Conferences
1/15/2025	Travis Close	3.5	\$850	\$2,975	Travel back home from pretrial conference - flight from SFO to SEA, including check-in, luggage, boarding/de-boarding	Case Management Conferences
1/15/2025	Travis Close	0.3	\$850	\$255	Emails to JUB re: revisions to demonstrative chart for tracking purposes	Trial and Pretrial Preparation
1/15/2025	Travis Close	2.3	\$850	\$1,955	Additions/revisions to demonstratives for consultant, including additional barrier photos, FSP slides, photos & videos of plaintiff Algarme	Trial and Pretrial Preparation
1/16/2025	Guy Wallace	0.5	\$1,350	\$675	zoom with GG; JY; BU; MTJ re preparation for settlement meeting with Defendants	Settlement
1/16/2025	Guy Wallace	2.3	\$1,350	\$3,105	zoom with Goodwin; Launey; Rutner; GG; JY; BU; MTJ re settlement and injunctive relief terms	Settlement
1/16/2025	Guy Wallace	0.4	\$1,350	\$540	zoom with GG; JY; MTJ re preparation for settlement conference with MJ Spero	Settlement
1/16/2025	Guy Wallace	4.0	\$1,350	\$5,400	settlement conference with MJ Spero re injunctive relief	Settlement
1/16/2025	Guy Wallace	1.5	\$1,350	\$2,025	revise and edit draft opening statement	Trial and Pretrial Preparation
1/16/2025	Jennifer Bybee	0.2	\$925	\$185	Com's with TCC and D. Murov re demonstrative creation	Trial and Pretrial Preparation
1/16/2025	Jennifer Bybee	2.0	\$925	\$1,850	Review demonstratives created by D. Murov and update TOC	Trial and Pretrial Preparation
1/16/2025	Mark Johnson	0.5	\$1,150	\$575	Zoom call w/ Wallace, Grunfeld, Yelin, Umpierre re latest injunctive relief term sheet to prepare for mtg w/ OC re same	Settlement

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/16/2025	Mark Johnson	2.4	\$1,150	\$2,760	zoom call w/ OC Goodwin, Launey, Rutner re injunctive relief term sheet for prep for settlement conference w/ judge Spero.	Settlement
1/16/2025	Mark Johnson	0.5	\$1,150	\$575	internal call w/ Yelin, Wallace, Grunfeld btwn mtg w/ OC and settlement conference to discuss position on issues	Settlement
1/16/2025	Mark Johnson	4.0	\$1,150	\$4,600	Settlement conference w/ OC and Judge Spero	Settlement
1/16/2025	Mark Johnson	0.2	\$1,150	\$230	call w/ COC following settlement conference.	Settlement
1/16/2025	Rachel Steyer	2.7	\$750	\$2,025	depo prep session with BSU and witness Christopher Gail	Depositions
1/16/2025	Rachel Steyer	0.2	\$750	\$150	gathering/double checking Clarence Alvey docs, transmitting to AS	Trial and Pretrial Preparation
1/16/2025	Rachel Steyer	0.6	\$750	\$450	gathering docs requested by trial vendor tech support team	Trial and Pretrial Preparation
1/16/2025	Travis Close	0.2	\$850	\$170	Review and analyze supplemental affidavit by Jeanette Algarne & supplemental ROG responses	Trial and Pretrial Preparation
1/16/2025	Travis Close	0.8	\$850	\$680	Revisions to barrier demonstratives -- Jeanette Algarne's room	Trial and Pretrial Preparation
1/16/2025	Travis Close	1.7	\$850	\$1,445	Further revisions to FSP demonstrative slides for DM (consultant)	Trial and Pretrial Preparation
1/16/2025	Travis Close	1.6	\$850	\$1,360	Legal research on cases interpreting "legitimate safety requirements" provision in context of ADA regulations (9th Circuit)	Trial and Pretrial Preparation
1/16/2025	Travis Close	1.8	\$850	\$1,530	Legal research on cases interpreting "legitimate safety requirements" provision in context of ADA regulations (outside of 9th Circuit)	Trial and Pretrial Preparation
1/16/2025	Travis Close	1.3	\$850	\$1,105	Legal research on agency guidance published by DOT and FTA re: "legitimate safety requirements"	Trial and Pretrial Preparation
1/17/2025	Rachel Steyer	0.2	\$750	\$150	reviewing FTA ADA guidelines circulated by TCC	Misc. Research

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/17/2025	Travis Close	0.8	\$850	\$680	Call with Doug Cross re: update on stay of case / postponing trial	Trial and Pretrial Preparation
1/17/2025	Travis Close	0.6	\$850	\$510	Call with June Kailes re: update on stay of case / postponing trial	Trial and Pretrial Preparation
1/17/2025	Travis Close	0.7	\$850	\$595	Review and analyze videos of emergency evacuation from senior living facilities in LA fires	Trial and Pretrial Preparation
1/17/2025	Travis Close	0.1	\$850	\$85	Email to doug cross re: court's order setting new trial date	Trial and Pretrial Preparation
1/22/2025	Travis Close	0.4	\$850	\$340	Review and analyze recent DSS complaint investigation and facility evaluation reports issued for Brookhurst, San Ramon, Scotts Valley facilities	Case Organization, Planning and Strategy
1/22/2025	Travis Close	0.4	\$850	\$340	Call to GBW re: research needed for settlement negotiations / injunctive relief	Settlement
1/23/2025	Guy Wallace	3.7	\$1,350	\$4,995	preparation for 2/4 settlement conference with MJ Spero; analysis of Plaintiffs' position and arguments re fees and costs	Settlement
1/23/2025	Guy Wallace	0.3	\$1,350	\$405	com's with GG re preparation for 2/4 settlement conference with MJ Spero	Settlement
1/23/2025	Travis Close	0.6	\$850	\$510	Call with resident Lori Hansen re: status update on class action at Brookhurst facility	Class Outreach and Contact
1/23/2025	Travis Close	0.6	\$850	\$510	Call with GBW re: mediation research assignment	Settlement
1/24/2025	Guy Wallace	1.8	\$1,350	\$2,430	legal research and analysis re applicable standards under Supreme Court and Ninth Circuit case law re lodestar reductions in the context of partial success resolutions or settlements	Settlement
1/25/2025	Guy Wallace	2.4	\$1,350	\$3,240	preparation of points for settlement conference brief re fees and costs	Settlement
1/25/2025	Guy Wallace	3.1	\$1,350	\$4,185	legal research and analysis re applicable standards re recovery of fees re partial success; com's with RMP re same (.4)	Settlement

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/25/2025	Mark Johnson	1.8	\$1,150	\$2,070	review discovery ltr briefs and orders and prepare chart for attorney fee analysis for settlement.	Settlement
1/26/2025	Guy Wallace	3.1	\$1,350	\$4,185	legal research and analysis re partial or limited success and Ninth Circuit cases re lodestar reductions	Settlement
1/26/2025	Guy Wallace	2.9	\$1,350	\$3,915	preparation and drafting of detailed outline for brief re fees and costs for 2/4/25 settlement conference	Settlement
1/26/2025	Mark Johnson	4.0	\$1,150	\$4,600	continue reviewing discovery letters and orders and preparing chart for fee analysis	Settlement
1/27/2025	Guy Wallace	3.3	\$1,350	\$4,455	preparation and drafting of settlement conference statement re fees and costs	Settlement
1/28/2025	Guy Wallace	2.2	\$1,350	\$2,970	preparation and drafting of settlement conference statement sections re rates and hours	Other Motions
1/28/2025	Guy Wallace	2.4	\$1,350	\$3,240	preparation and drafting of settlement conference statement re fees and costs	Settlement
1/28/2025	Guy Wallace	2.3	\$1,350	\$3,105	preparation of settlement conference statement re fees and costs; sections re prevailing party; lodestar	Settlement
1/28/2025	Guy Wallace	2.6	\$1,350	\$3,510	preparation and drafting of settlement conference statement; sections re parties success and applicable law re same	Settlement
1/28/2025	Mark Johnson	0.9	\$1,150	\$1,035	review docket and files to complete information for fee justification argument for settlement conference. coms w GBW re same	Settlement
1/28/2025	Mark Johnson	0.6	\$1,150	\$690	review draft stip for injunctive relief for settlement, add comments re same and com w GBW	Settlement
1/28/2025	Rachel Steyer	0.5	\$750	\$375	received call from daughter of Scotts Valley resident, discussed case and family situation	Class Outreach and Contact
1/29/2025	Guy Wallace	2.4	\$1,350	\$3,240	preparation and drafting of Plaintiffs' settlement conference statement re fees and costs	Settlement
1/29/2025	Guy Wallace	2.8	\$1,350	\$3,780	preparation and drafting of settlement conference statement re fees and costs; introduction	Settlement

Date	Initials	Hours	Rate	Amount	Description	ProjectName
1/29/2025	Guy Wallace	2.9	\$1,350	\$3,915	preparation and drafting of settlement conference statement re fees and costs; revise and edit same	Settlement
1/29/2025	Jennifer Bybee	2.3	\$925	\$2,128	Research whether unsuccessful motions for class certification are compensable	Settlement
1/29/2025	Jennifer Bybee	0.2	\$925	\$185	Draft email to GBW re results of research re fee award for unsuccessful class certification motion	Settlement
1/30/2025	Guy Wallace	3.9	\$1,350	\$5,265	revise and edit draft settlement conference statement re fees and costs	Settlement
1/30/2025	Guy Wallace	1.0	\$1,350	\$1,350	zoom with GG; JY; BU; MTJ re Plaintiffs' draft of injunction; submission to MJ Spero re fees and costs	Settlement
1/30/2025	Guy Wallace	3.7	\$1,350	\$4,995	revise and edit draft settlement conference statement re fees and costs, incorporation of proposed edits from GG; JY; BU; MTJ	Settlement
1/30/2025	Mark Johnson	1.0	\$1,150	\$1,150	zoom call w/ Yellin, Grunfeld, Umpierre Wallace re issue on stipulation for injunction.	Settlement
1/30/2025	Mark Johnson	1.0	\$1,150	\$1,150	review brief re attorneys' fees for settlement conference	Settlement
1/31/2025	Guy Wallace	1.1	\$1,350	\$1,485	review and analysis of Defendants' proposed injunctive relief term sheet; com's with MTJ re same (.3)	Settlement
1/31/2025	Guy Wallace	1.1	\$1,350	\$1,485	com's with MJ Spero; Goodwin; GG; JY; BU; MTJ re settlement and injunctive relief provisions re Brookhurst facility	Settlement
2/1/2025	Guy Wallace	4.3	\$1,350	\$5,805	preparation and drafting of letter to GK re Brookdale Brookhurst and liability as owner/lessor; com's with MTJ re same (.7)	Settlement
2/1/2025	Mark Johnson	0.6	\$1,150	\$690	calls (x3) w/ GBW re bringing Goldrich Kest into settlement discussions, filing suit against them, corporate structure, leases and management agreements.	Settlement

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/1/2025	Mark Johnson	1.5	\$1,150	\$1,725	research re Brookurst Royale, LLC and Goldrich and Kest entities for potential ancillary lawsuit, bringing them into settlement discussion, pull and review leases and docs produced re ownership.	Settlement
2/3/2025	Guy Wallace	1.7	\$1,350	\$2,295	review and analysis of Defendants' 2/2 version of term sheet re injunctive relief; comparison to prior versions of same with respect to provisions re Brookhurst lease; responses thereto	Settlement
2/3/2025	Guy Wallace	1.3	\$1,350	\$1,755	preparation of outline of potential complaint against G&K, Brookhurst Royale; com's with GG; MTJ; TCC re same (.6)	Settlement
2/3/2025	Guy Wallace	0.6	\$1,350	\$810	zoom with Goodwin; Rutner; Launey; GG; JY; BU; MTJ re latest iterations of term sheet re injunctive relief	Settlement
2/3/2025	Guy Wallace	0.5	\$1,350	\$675	zoom with GG; JY; BU; MTJ re settlement and analysis of results of zoom with Defendants re same	Settlement
2/3/2025	Guy Wallace	0.6	\$1,350	\$810	revise and edit draft letter to Davis re litigation against G&K and Brookhurst Royale; com's with GG re same	Settlement
2/3/2025	Guy Wallace	0.8	\$1,350	\$1,080	com's with GG; BU re settlement	Settlement
2/3/2025	Guy Wallace	0.4	\$1,350	\$540	review and analysis of further version of term sheet prepared by JY; com's with JY re same	Settlement
2/3/2025	Guy Wallace	1.2	\$1,350	\$1,620	preparation for 2/4 settlement conference with MJ Spero re settlement; com's with MTJ re same	Settlement
2/3/2025	Mark Johnson	0.5	\$1,150	\$575	zoom call w/ OC Goodwin, Rutner, Launey, and COC Wallace, Grunfeld, Yellin, Umpierre re injunctive relief term sheet.	Settlement
2/3/2025	Mark Johnson	0.4	\$1,150	\$460	team zoom call w / Grunfeld, Wallace, Yelin, Umpierre re follow up positions and actions based on call w/ OC re injunctive relief term sheet.	Settlement

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/3/2025	Mark Johnson	0.4	\$1,150	\$460	Review and comment on revised term sheet from J Yelin and revised demand letter to GK from GBW	Settlement
2/3/2025	Mark Johnson	0.6	\$1,150	\$690	calls w/ GBW re injunctive relief term sheet, resolution of issue regarding termination of Brookhurst lease, potential suit against owners and joinder in case	Settlement
2/3/2025	Rachel Steyer	0.2	\$750	\$150	call with GBW re Brookhurst outreach/witnesses status	Class Outreach and Contact
2/3/2025	Travis Close	0.9	\$850	\$765	Meet with GBW re: new complaint against owner of Brookhurst facility and affiliates, subsidiaries, officers	Case Organization, Planning and Strategy
2/3/2025	Travis Close	0.6	\$850	\$510	Legal research on the divisions of the central district of california	Case Organization, Planning and Strategy
2/3/2025	Travis Close	1.3	\$850	\$1,105	Legal research on organizational structure of Goldrich Kest, owner of Brookhurst facility	Case Organization, Planning and Strategy
2/3/2025	Travis Close	0.6	\$850	\$510	Email to June Kailes re: update on status of trial, progress towards settlement, next steps	Case Organization, Planning and Strategy
2/3/2025	Travis Close	1.3	\$850	\$1,105	Legal research on other cases filed with BROOKHURST ROYALE LLC as plaintiff/defendant to determine affiliates/subsidiaries	Case Organization, Planning and Strategy
2/4/2025	Guy Wallace	8.4	\$1,350	\$11,340	preparation for and participate in further settlement conference with MJ Spero	Settlement
2/4/2025	Mark Johnson	0.6	\$1,150	\$690	calls w/ GBW re strategy for brining Brookhurst owners into the case or suing separately, addressing expiring lease issue in settlement conference.	Case Organization, Planning and Strategy
2/4/2025	Mark Johnson	8.0	\$1,150	\$9,200	Zoom settlement conference w/ Judge Spero	Settlement
2/4/2025	Rachel Steyer	2.2	\$750	\$1,650	reviewing and researching class lists for Brookhurst current/former residents and responsible parties who may live in NDCA	Class Outreach and Contact
2/4/2025	Rachel Steyer	0.6	\$750	\$450	received call back from Sarah Magaro, daughter of current Brookhurst resident, discussed case, scheduled follow up call	Class Outreach and Contact

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/4/2025	Travis Close	1.5	\$850	\$1,275	Review deposition testimony for Algarme re: physical access barriers & allegations to incorporate into complaint against Brookhurst owner	Depositions
2/5/2025	Guy Wallace	1.1	\$1,350	\$1,485	further analysis of Plaintiffs' extent of success in case overall and potential impact on fee award	Other Motions
2/5/2025	Guy Wallace	1.2	\$1,350	\$1,620	zoom with GG; JY; BU; MTJ re Defendants' proposed material changes to term sheet and Plaintiffs' responses thereto	Other Motions
2/5/2025	Guy Wallace	0.6	\$1,350	\$810	review and analysis of MTJ comments re Defendants' proposed revisions to term sheet after the 2/4/25 settlement conference; com's with MTJ re same	Settlement
2/5/2025	Guy Wallace	0.4	\$1,350	\$540	comparison of Defendants' old Residency Agreement provision re alterations with new provision of Residency Agreement re same; lack of mandatory cost provision	Settlement
2/5/2025	Guy Wallace	2.3	\$1,350	\$3,105	review and analysis of Defendants' proposed further material changes to the term sheet; com's with JY; GG; MTJ; BU re same	Settlement
2/5/2025	Mark Johnson	0.8	\$1,150	\$920	review 30b6 depo notice and select topics for RAP and B&S depositions; draft email response to OC email re same and re depo logistics, conditions; coms w/ COC re same; revise and circulate and finalize email	Depositions
2/5/2025	Mark Johnson	1.9	\$1,150	\$2,185	Zoom call w/ Grunfeld, Wallace, Yelin, Umpierre to review and agree on acceptable and non-acceptable revisions to term sheet made by Ds	Settlement
2/5/2025	Mark Johnson	1.7	\$1,150	\$1,955	careful review of D revised term sheet of this date and comparison to original from last settlement conference and J Yelin proposed edits; draft comments and email re same..	Settlement
2/5/2025	Mark Johnson	0.2	\$1,150	\$230	call w Stacy Stiner re results of settlement conference	Settlement

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/5/2025	Mark Johnson	0.3	\$1,150	\$345	call w Rita Stiner re settlement conference results, damages for Stacy, special needs trust	Settlement
2/5/2025	Mark Johnson	0.9	\$1,150	\$1,035	calls (x9) w/ GBW re settlement issues, D's proposed late revisions to term sheet, comparisons to prior versions of term sheet, proposed positions for responding to same.	Settlement
2/5/2025	Mark Johnson	0.1	\$1,150	\$115	email exchanges w/ OC Tom Goodwin re proposed late revisions to term sheet.	Settlement
2/5/2025	Mark Johnson	0.4	\$1,150	\$460	email exchanges w/ COC re proposed revisions to term sheet, response to same, seeking intervention from Judge Spero; review emails from MJ Spero and OC	Settlement
2/5/2025	Travis Close	2.3	\$850	\$1,955	Revisions to draft complaint vs owner of Brookhurst facility (barriers encountered by Algarme)	Case Organization, Planning and Strategy
2/6/2025	Guy Wallace	0.7	\$1,350	\$945	review and analysis of Defendants' responses to 2/5/25 p.m. version of term sheet; com's with Goodwin re same; com's with MJ Spero re same	Settlement
2/6/2025	Guy Wallace	1.5	\$1,350	\$2,025	com's with MJ Spero; Goodwin; GG; KAS; TMS; MTJ re fees and costs; analysis of same	Settlement
2/6/2025	Mark Johnson	0.3	\$1,150	\$345	review new revised term sheet from OC with comments; participate in call w/ OC re same	Settlement
2/6/2025	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW re D attorneys fee offer, possible mediator proposal, risk of fee motion with no appellate right.	Settlement
2/10/2025	Guy Wallace	1.3	\$1,350	\$1,755	com's with GG; JY; BU; MTJ re whether settlement notice is required for a (b)(2); legal research and analysis re same	Settlement
2/10/2025	Mark Johnson	0.4	\$1,150	\$460	calls w/ GBW re settlement issues, including required notice and form of final approval motion.	Settlement

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/10/2025	Mark Johnson	0.2	\$1,150	\$230	review and respond to emails re settlement issues, including notice and form of motion	Settlement
2/10/2025	Rachel Steyer	0.5	\$750	\$375	received call from son of Tracy resident, discussed case and mother's care	Class Outreach and Contact
2/10/2025	Rachel Steyer	0.5	\$750	\$375	call with Wendy DeMello to notify her of settlement	Settlement
2/10/2025	Travis Close	0.4	\$850	\$340	Call to LEC re: assignments in prep for settlement briefs	Case Organization, Planning and Strategy
2/11/2025	Guy Wallace	0.7	\$1,350	\$945	prepare for and participate in CMC with Judge Gilliam re preliminary approval	Case Management Conferences
2/11/2025	Guy Wallace	0.5	\$1,350	\$675	com's with JY; BU; MTJ re results of CMC with Judge Gilliam	Case Management Conferences
2/11/2025	Guy Wallace	1.2	\$1,350	\$1,620	com's with Rutner; GG; JY; BU; MTJ re requirements re notice to the class; form of settlement agreement; schedule re preliminary approval and final approval	Case Management Conferences
2/11/2025	Guy Wallace	0.2	\$1,350	\$270	com's with MJ Spero; GG re status of further negotiations re fees and costs	Settlement
2/11/2025	Mark Johnson	0.7	\$1,150	\$805	Status Conference re settlement	Case Management Conferences
2/11/2025	Mark Johnson	0.5	\$1,150	\$575	team zoom call w/ Wallace, Grunfeld, Yelin, Umpierre re plan for status conference with court re settlement, including notice issue and timing / form of approval motion	Settlement
2/11/2025	Mark Johnson	0.3	\$1,150	\$345	team zoom call w Yelin, Wallace, Umpierre to follow up on status conference and plans for preliminary approval motion, fee motion.	Settlement
2/11/2025	Rachel Steyer	0.2	\$750	\$150	call with Clarence Alvey notifying him of settlement	Settlement
2/12/2025	Travis Close	0.4	\$850	\$340	Call with GBW re: motion for preliminary approval assignments	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/13/2025	Guy Wallace	1.2	\$1,350	\$1,620	review and analysis of Defendants' draft of settlement agreement; individual settlement agreement; com's with GG; JY; BU; MTJ re issues re same	Settlement
2/14/2025	Guy Wallace	1.9	\$1,350	\$2,565	review and analysis of draft class settlement agreement and individual settlement agreement from Rutner	Settlement
2/14/2025	Guy Wallace	1.1	\$1,350	\$1,485	zoom with GG; JY; BU; MTJ re Defendants' proposed full-length settlement agreements drafts; Plaintiffs' responses thereto & follow up com's re same	Settlement
2/14/2025	Guy Wallace	0.6	\$1,350	\$810	com's with BU re Defendants' draft settlement agreement & review and analysis of final settlement agreement in Sunrise case as comparison	Settlement
2/14/2025	Mark Johnson	1.1	\$1,150	\$1,265	Zoom call w/ COC Wallace, Yelin, Grunfeld re issues with D drafts of settlement agreements, strategy for responding to same.	Settlement
2/14/2025	Mark Johnson	0.1	\$1,150	\$115	call w/ GBW re issues w /D draft of settlement agreement	Settlement
2/14/2025	Mark Johnson	0.6	\$1,150	\$690	review draft settlement agreements from D for call w COC re same.	Settlement
2/16/2025	Guy Wallace	1.7	\$1,350	\$2,295	review and analysis of further drafts of class settlement agreement and individual settlement agreements from JY; revise and edit same	Settlement
2/18/2025	Guy Wallace	0.8	\$1,350	\$1,080	zoom with GG; JY; BU; MTJ re revisions to Defendants' draft settlement agreements	Settlement
2/18/2025	Mark Johnson	1.0	\$1,150	\$1,150	review draft individual and class settlement agreement with JY/GBW revisions, take notes on same and email re same.	Settlement

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/18/2025	Mark Johnson	1.1	\$1,150	\$1,265	Zoom conference w/ GBW, Grunfeld, Yelin and Umpierre to review and discuss draft individual and class settlement agreements for call tomorrow with OC and proposed edits to same.	Settlement
2/18/2025	Mark Johnson	0.6	\$1,150	\$690	call w GBW re draft individual and class settlement agreements and issues, proposed edits re same.	Settlement
2/18/2025	Travis Close	0.3	\$850	\$255	Email to GBW re: outline for draft motion for prelim approval of settlement	Case Organization, Planning and Strategy
2/18/2025	Travis Close	0.3	\$850	\$255	Email to RLS re: details of terms of settlement agreement	Case Organization, Planning and Strategy
2/19/2025	Guy Wallace	0.8	\$1,350	\$1,080	com's with Goodwin; Rutner; GG; JY; BU; MTJ re revisions to long form settlement agreements	Settlement
2/19/2025	Guy Wallace	0.7	\$1,350	\$945	preparation of language for settlement agreement re "safe harbor" for elements that comply with 1991 ADAAG; com's with JY re same	Settlement
2/19/2025	Guy Wallace	1.1	\$1,350	\$1,485	legal research and analysis re requirement for class notice and Rule 23(e)(1)	Settlement
2/19/2025	Guy Wallace	0.4	\$1,350	\$540	preparation and drafting of insert re class notice for preliminary approval motion; settlement agreement	Settlement
2/19/2025	Guy Wallace	0.6	\$1,350	\$810	zoom with GG; JY; MTJ re follow up to com's with Defendants re long form settlement agreements	Settlement
2/19/2025	Mark Johnson	1.1	\$1,150	\$1,265	zoom video with OC Rutner and Goodwin and COC Wallace, Grunfeld, Umpierre, Yelin re revisions to draft settlement agreements and resolution of differences.	Settlement
2/19/2025	Mark Johnson	0.6	\$1,150	\$690	Zoom call w GBW, Grunfeld, Yelin re further revisions to 2 draft settlement agreements and related tasks.	Settlement
2/19/2025	Travis Close	1.2	\$850	\$1,020	Analyze depo designations for Algarne testimony re: barriers experienced at Brookhurst	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/19/2025	Travis Close	1.3	\$850	\$1,105	Analyze ROG & depo responses from Algarne re: allegations for complaint against Brookhurst owner	Case Organization, Planning and Strategy
2/19/2025	Travis Close	0.2	\$850	\$170	Email to GBW re: updates on missing information for draft settlement agreement	Case Organization, Planning and Strategy
2/19/2025	Travis Close	0.2	\$850	\$170	Email to RLS re: research needed for emergency evacuation injunctive relief in settlement	Case Organization, Planning and Strategy
2/19/2025	Travis Close	0.4	\$850	\$340	Legal research on owner's ability to contract away responsibility for accessibility improvements	Case Organization, Planning and Strategy
2/20/2025	Guy Wallace	2.1	\$1,350	\$2,835	review and analysis of further drafts of class and individual settlement agreements; revise and edit same	Settlement
2/20/2025	Travis Close	0.8	\$850	\$680	Analyze Mastin Brookhurst report for additional categories of barriers to include in owner complaint	Case Organization, Planning and Strategy
2/20/2025	Travis Close	0.2	\$850	\$170	Review and analyze notes re: latest negotiations on settlement agreement	Case Organization, Planning and Strategy
2/24/2025	Guy Wallace	1.0	\$1,350	\$1,350	zoom with Goodwin; ER; GG; JY; BU; MTJ re further drafts of settlement agreements; issues re notice; follow up zoom co-counsel re results of same (.4)	Settlement
2/24/2025	Guy Wallace	0.4	\$1,350	\$540	com's with Goodwin; GG re issue of reasonable attorneys' fees and costs; analysis of Goodwin response re same	Settlement
2/24/2025	Mark Johnson	0.5	\$1,150	\$575	video call w OC Rutner and Goodwin, COC Yelin, Grunfeld and Wallace re near final issues with individual and class settlement agreements.	Settlement
2/24/2025	Mark Johnson	0.4	\$1,150	\$460	folllow up video call w/ COC Wallace, Grunfeld, Yelin and Umpierre remaining issues on settlement agreements after call w/ OC	Settlement
2/24/2025	Travis Close	0.9	\$850	\$765	Call with June Kailes re: update on case and elements of emergency evacuation relief in settlement	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
2/24/2025	Travis Close	0.3	\$850	\$255	Call with GBW re: updates to draft settlement agreement re: emergency evacuation provisions	Case Organization, Planning and Strategy
2/25/2025	Guy Wallace	0.6	\$1,350	\$810	review and analysis of further drafts of settlement agreements; proposed plan re notice	Settlement
2/25/2025	Guy Wallace	1.3	\$1,350	\$1,755	revise and edit draft of proposed notice of class action settlement	Settlement
2/26/2025	Guy Wallace	0.8	\$1,350	\$1,080	legal research and analysis re Supreme Court decision in Lackey v. Stinnie re prevailing party status and entitlement to recover fees	Settlement
2/27/2025	Guy Wallace	0.5	\$1,350	\$675	com's with GG; JY; MTJ re draft settlement agreements; draft notice to the class (if ordered)	Settlement
2/28/2025	Mark Johnson	0.2	\$1,150	\$230	coms w/ R Stiner and S Stiner re status of settlement, getting signatures on agreement, setting up special needs trust and tax advice re monetary award	Settlement
3/1/2025	Mark Johnson	0.3	\$1,150	\$345	Texts and call w/ Rita Stiner re review of settlement agreements, meeting	Settlement
03/01/2025	Mark Johnson	0.3	\$1,150	\$345	Texts and call w/ Rita Stiner re review of settlement agreements, meeting	Settlement
03/03/2025	Mark Johnson	0.1	\$1,150	\$115	call and text w/ R Stiner re review and signature on settlement agreements.	Settlement
03/04/2025	Mark Johnson	0.2	\$1,150	\$230	coms w/ J Yelin re final versions of settlement agreements, plans for reviewing and getting signatures from R & S Stiner. text w/ R Stiner re same.	Settlement
03/04/2025	Mark Johnson	0.2	\$1,150	\$230	com w/ GBW re merits of settlement and communication w/ clients re same.	Settlement
03/05/2025	Guy Wallace	0.8	\$1,350	\$1,080	zoom with Goodwin; GG re fees and costs; com's with GG; TMS; MTJ re same (.4)	Settlement
03/05/2025	Jennifer Bybee	0.1	\$925	\$93	Com's with GBW re status update re Settlement	Settlement

Date	Initials	Hours	Rate	Amount	Description	ProjectName
03/05/2025	Mark Johnson	0.5	\$1,150	\$575	participate in zoom call w/ Ralph and Joannie Carlson and COC Grunfeld and Yelin to review and explain settlement agreement	Settlement
03/05/2025	Mark Johnson	0.7	\$1,150	\$805	participate in zoom mtg w/ Michele Lytle to review and explain settlement agreement.	Settlement
03/05/2025	Mark Johnson	0.8	\$1,150	\$920	zoom call w/ client Bernie Jestabek-Hart and COC Grunfeld and Yelin to review and explain settlement agreements	Settlement
03/05/2025	Mark Johnson	0.5	\$1,150	\$575	Prep for mtg w/ R Stiner and S Stiner to review and explain settlement agreements.	Settlement
03/05/2025	Mark Johnson	0.2	\$1,150	\$230	text coms w/ R Stiner and S Stiner re scheduling meetings to review settlement agreements.	Settlement
03/05/2025	Travis Close	0.2	\$850	\$170	Review and analyze draft class notice	Case Organization, Planning and Strategy
03/05/2025	Travis Close	0.2	\$850	\$170	Email to GBW re: question about class notice in settlement agreement	Case Organization, Planning and Strategy
03/06/2025	Guy Wallace	0.8	\$1,350	\$1,080	com's with Goodwin; GG; TMS re mediator's proposal and resolution of issue of fees and costs; analysis of same	Settlement
03/06/2025	Mark Johnson	1.4	\$1,150	\$1,610	mtg w/ client S Stiner to review and explain settlement agreements	Misc. Research
03/06/2025	Mark Johnson	1.7	\$1,150	\$1,955	meeting w/ Rita Stiner to review and explain settlement agreement.	Settlement
03/07/2025	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of draft motion for preliminary approval of settlement	Other Motions
03/08/2025	Guy Wallace	2.7	\$1,350	\$3,645	review and analysis of preliminary approval motion; revise and edit same	Other Motions
03/10/2025	Guy Wallace	2.6	\$1,350	\$3,510	revise and edit draft motion for preliminary approval; review of draft stipulated injunction and order	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
03/10/2025	Guy Wallace	0.4	\$1,350	\$540	com's with GG; JY; MTJ re motion for preliminary approval; settlement agreement	Other Motions
03/10/2025	Mark Johnson	0.4	\$1,150	\$460	calls w/ GBW (x2) re language in settlement agreement and preliminary approval mtn re readily achievable, signatories to agreement	Settlement
03/10/2025	Mark Johnson	1.0	\$1,150	\$1,150	review draft preliminary approval motion and draft email to COC w/ comments	Settlement
03/12/2025	Guy Wallace	0.9	\$1,350	\$1,215	analysis of draft settlement requirements re readily achievable barrier removal; com's with GG; JY; BU; MTJ re proposed revisions re same	Settlement
03/12/2025	Mark Johnson	0.5	\$1,150	\$575	Zoom call w/ COC Grunfeld, Yelin, Wallace re language in settlement agreement re readily achievable barrier removal and reference to checklist, problems with same, approaching OC re same.	Settlement
03/12/2025	Mark Johnson	0.4	\$1,150	\$460	draft email to COC re concerns about referencing checklist for readily achievable barrier removal and analysis of same; pull readily achievable statute, reg and checklist and email w/ COC re same; analysis of checklist.	Settlement
03/12/2025	Mark Johnson	0.6	\$1,150	\$690	calls w/ GBW re settlement agreement and potential dispute re who signs agreement	Settlement
03/12/2025	Mark Johnson	0.2	\$1,150	\$230	review proposed revisions to settlement agreement re fee language and readily achievable language, review email exchanges re signatures on agreement.	Settlement
03/13/2025	Guy Wallace	0.8	\$1,350	\$1,080	review and analysis of further draft of motion for preliminary approval; Defendants' comments re same	Settlement
03/13/2025	Guy Wallace	1.1	\$1,350	\$1,485	com's with GG; JY; KAS; BU; Marks; MTJ re settlement agreement; motion for preliminary approval	Settlement

Date	Initials	Hours	Rate	Amount	Description	ProjectName
03/13/2025	Mark Johnson	0.3	\$1,150	\$345	call from GBW re D proposed alternative language fees in settlement agreement and comments / proposed edits on draft mtn for preliminary approval.	Settlement
03/13/2025	Mark Johnson	0.3	\$1,150	\$345	zoom call w/ Grunfeld, Yelin, Umpierre re D's comments and proposed edits on settlement agreement language re fees and draft preliminary approval motion.	Settlement
03/13/2025	Mark Johnson	0.4	\$1,150	\$460	review and analyze D comments and proposed edits to draft preliminary approval motion.	Settlement
03/13/2025	Mark Johnson	0.2	\$1,150	\$230	further email coms re meeting w/ OC re settlement and Ds proposed changes to agreement and preliminary approval motion.	Settlement
03/14/2025	Guy Wallace	3.3	\$1,350	\$4,455	revise and edit draft declaration of GBW re preliminary approval	Settlement
03/14/2025	Guy Wallace	0.5	\$1,350	\$675	zoom with Goodwin; Rutner; GG; JY; BU; MTJ re proposed revisions to preliminary approval motion; stipulated injunction and order; provision re reasonable attorneys' fees and costs	Settlement
03/14/2025	Guy Wallace	0.7	\$1,350	\$945	com's with GG; JY; BU; MTJ re revisions to class settlement agreement; individual settlement agreements; stipulated injunction and order; preliminary approval motion	Settlement
03/14/2025	Mark Johnson	0.6	\$1,150	\$690	Zoom mtg w/ OC re settlement agreement, preliminary injunction mtn and stipulated injunction (.3); follow up internal zoom w/ COC Wallace, Umpierre, Yelin and Grunfeld re remaining issues and edits.	Settlement
03/16/2025	Mark Johnson	0.2	\$1,150	\$230	coms w/ client S. Stiner and COC re settlement agreement and preliminary approval hearing.	Settlement

Date	Initials	Hours	Rate	Amount	Description	ProjectName
03/19/2025	Travis Close	1.1	\$850	\$935	Review and analyze plaintiffs' motion for preliminary approval of class action settlement & supporting declarations	Case Organization, Planning and Strategy
03/19/2025	Travis Close	0.7	\$850	\$595	Review and analyze executed settlement agreement & stipulated injunction	Case Organization, Planning and Strategy
03/21/2025	Travis Close	0.6	\$850	\$510	Call with Stacia Stiner re: update on settlement progress, motion for preliminary approval of settlement	Class Outreach and Contact
04/03/2025	Mark Johnson	0.8	\$1,150	\$920	Review discovery motion history and results and update chart re same for identification of work to exclude from fee petition as billing judgment	Other Motions
04/04/2025	Mark Johnson	3.4	\$1,150	\$3,910	review time entries for fee motion for billing judgment deletions	No Charge
04/05/2025	Guy Wallace	2.4	\$1,350	\$3,240	preparation and drafting of outline of Rule 23(h) motion	Other Motions
04/07/2025	Travis Close	0.6	\$850	\$510	Email to June Kailes re: update on case, settlement, motion to preliminary approval	Case Organization, Planning and Strategy
04/08/2025	Guy Wallace	1.5	\$1,350	\$2,025	preparation and drafting of Rule 23(h) motion	Other Motions
04/08/2025	Guy Wallace	0.5	\$1,350	\$675	com's with BU; MTJ re schedule on Rule 23(h) motion and notice to the subclasses	Other Motions
04/09/2025	Guy Wallace	0.6	\$1,350	\$810	review and analysis of proposed schedule from BU re Rule 23(h) motion; com's with BU; JAU re same	Other Motions
04/10/2025	Guy Wallace	1.5	\$1,350	\$2,025	com's with GG; BU; MTJ re preparation of Rule 23(h) motion; schedule re notice; nature of Rule 23(h) notice; billing judgment issues; analysis of same	Other Motions
04/10/2025	Travis Close	1.4	\$850	\$1,190	Analysis of number of discovery disputes between 2022-2024 based on docket filings and communications with co-counsel	Case Organization, Planning and Strategy
04/11/2025	Guy Wallace	1.2	\$1,350	\$1,620	preparation of initial draft of Rule 23(h) motion	Other Motions
04/12/2025	Guy Wallace	1.5	\$1,350	\$2,025	preparation and drafting of Rule 23(h) motion	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
04/13/2025	Guy Wallace	4.4	\$1,350	\$5,940	preparation and drafting of Rule 23(h) motion	Other Motions
04/14/2025	Guy Wallace	3.7	\$1,350	\$4,995	preparation and drafting of Rule 23(h) motion	Other Motions
04/14/2025	Guy Wallace	1.5	\$1,350	\$2,025	prepare for and participate in zoom with GG; JY; BU; MTJ re preparation of Rule 23(h) motion; notice; billing judgment	Other Motions
04/14/2025	Guy Wallace	0.7	\$1,350	\$945	com's with BU; MTJ; JAU re notice to the class; preparation of Rule 23(h) motion	Settlement
04/14/2025	Jennifer Bybee	0.5	\$925	\$463	Participate in Zoom meeting with GBW, MTJ, G. Grunfeld, J. Yelin, B. Umpierre re fee application timing, notice and billing judgment	Settlement
04/14/2025	Mark Johnson	0.5	\$1,150	\$575	team call w/ GBW, Grunfeld, Yellin, Umpierre re fee motion, billing judgment, timing and schedule	Case Organization, Planning and Strategy
04/15/2025	Guy Wallace	4.7	\$1,350	\$6,345	preparation and drafting of Rule 23(h) motion	Other Motions
04/16/2025	Guy Wallace	0.9	\$1,350	\$1,215	preparation and drafting of declaration of GBW re Rule 23(h) motion	Other Motions
04/17/2025	Guy Wallace	1.5	\$1,350	\$2,025	preparation and drafting of GBW Declarations re Rule 23(h) declaration	Other Motions
04/17/2025	Guy Wallace	0.6	\$1,350	\$810	com's with JAU re preparation of draft GBW Declaration re Rule 23(h) motion	Other Motions
04/17/2025	Mark Johnson	3.5	\$1,150	\$4,025	Work on draft JAP declaration re costs, including analysis of cost spreadsheet, development of questions for GK re same; email to GBW, JAU and GK with draft	Other Motions
04/25/2025	Guy Wallace	0.4	\$1,350	\$540	com's with JY; MTJ re preliminary approval hearing and Rule 23(h) motion	Other Motions
04/28/2025	Mark Johnson	0.2	\$1,150	\$230	email coms w/ JAU and TCC re discovery and motion practice history in case for fee motion declaration; locate and send to JAU chart of discovery motions.	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
04/28/2025	Travis Close	1.2	\$850	\$1,020	Review and analyze history of document requests, interrogatories, RFAs, and subpoenas served, to calculate totals for quantifying discovery resources utilized	Settlement
04/29/2025	Travis Close	1.2	\$850	\$1,020	Review and analyze history of productions by defendant vs. third parties to calculate number of docs / pages produced	Case Organization, Planning and Strategy
04/29/2025	Travis Close	0.2	\$850	\$170	Email to JUB re: counts of docs/pages of production by brookdale vs. third parties	Case Organization, Planning and Strategy
04/30/2025	Guy Wallace	0.9	\$1,350	\$1,215	com's with JY; BU; MJ re preparation for preliminary approval hearing; potential schedule re notice and final approval	Settlement
04/30/2025	Guy Wallace	0.3	\$1,350	\$405	com's with JAU re preparation of Rule 23(h) motion	Other Motions
04/30/2025	Mark Johnson	0.4	\$1,150	\$460	video conference w/ Yelin, Wallace, Umpierre re strategy for preliminary approval hearing, timeline, notice, responses to potential questions.	Settlement
04/30/2025	Mark Johnson	0.4	\$1,150	\$460	multiple email exchanges w/ Yelin, GBW, Umpierre re proposes schedule for notice to class and filing / hearing schedule on final approval hearing and fee motion. review ND class settlement guidelines for same.	Settlement
05/01/2025	Guy Wallace	2.2	\$1,350	\$2,970	attend motion for preliminary approval; com's with Goodwin; Rutner re results of same; com's with JY; MTJ re results of hearing and further submissions	Other Motions
05/01/2025	Mark Johnson	0.4	\$1,150	\$460	call w/ GBW re recap of preliminary approval hearing; follow up to be done w/in 21 days.	Settlement
05/05/2025	Guy Wallace	0.5	\$1,350	\$675	zoom with GG; JY; BU re preliminary approval; class notice;	Other Motions
05/05/2025	Guy Wallace	0.5	\$1,350	\$675	review and analysis of draft of class notice; revise and edit same; com's with GG; JY; BU re same	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
05/12/2025	Guy Wallace	0.4	\$1,350	\$540	review and analysis of Defendants' proposed changes to class notice; com's with JY re same	Settlement
05/14/2025	Guy Wallace	0.4	\$1,350	\$540	com's with JY; JAU re preliminary approval motion; Rule 23(h) motion	Other Motions
05/15/2025	Guy Wallace	0.8	\$1,350	\$1,080	legal research and analysis re method of dissemination of notice of a proposed Rule 23(b)(2) settlement	Settlement
05/15/2025	Guy Wallace	0.6	\$1,350	\$810	zoom with GG; JY; BU; MTJ re Defendant's proposed edits to form of notice and plan for distribution of notice	Settlement
05/15/2025	Guy Wallace	0.6	\$1,350	\$810	revise and edit draft brief re issue of preferential treatment re Stiner and Jestrabek-Hart	Other Motions
05/15/2025	Mark Johnson	0.6	\$1,150	\$690	zoom mtg with Wallace, Yelin, Grunfeld and Umpierre re settlement notice and dissemination of notice; strategy for mtg w/ OC re same	Settlement
05/15/2025	Mark Johnson	0.5	\$1,150	\$575	review redlined versions of proposed class notice and notice plans from OC for mtg	Settlement
05/16/2025	Guy Wallace	0.7	\$1,350	\$945	prepare for and participate in zoom with Goodwin; Rutner; GG; JY; BU; MTJ re form and manner of notice to the subclasses	Other Motions
05/16/2025	Guy Wallace	0.8	\$1,350	\$1,080	com's with GG; JY; BU; MTJ re form and manner of notice; analysis of meet and confer with Defendants re same; preparation of next steps re same	Other Motions
05/16/2025	Mark Johnson	0.5	\$1,150	\$575	zoom mtg w/ OC Goodwin and Rutner re notice to class and briefing w/ Yelin, Wallace, Grunfeld and Umpierre	Settlement
05/16/2025	Mark Johnson	0.5	\$1,150	\$575	team call w/ Wallace, Grunfeld, Umpierre, Yelin re notice issue and possible resolutions of dispute	Settlement
05/21/2025	Guy Wallace	1.3	\$1,350	\$1,755	revise and edit proposed class notices; com's with GG; BU; MTJ re identification of class members to receive notice	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
05/21/2025	Mark Johnson	0.2	\$1,150	\$230	Call from GBW re D's proposed method of notice to class, how class members will be identified.	Settlement
05/21/2025	Mark Johnson	0.1	\$1,150	\$115	review email from OC Goodwin with proposed method of notice.	Settlement
05/21/2025	Mark Johnson	0.6	\$1,150	\$690	Call from GBW re form and method of class notice, identification of class members	Settlement
05/22/2025	Guy Wallace	0.7	\$1,350	\$945	review and analysis of supplemental submission re preliminary approval; revise and edit same; com's re same and re notice issue with GG; BU; MTJ	Other Motions
05/26/2025	Mark Johnson	0.1	\$1,150	\$115	review proposed email to OC re notice and respond to COC re same.	Settlement
05/27/2025	Guy Wallace	0.9	\$1,350	\$1,215	com's with GG; JY; BU; MTJ re communication from Goodwin re notice plan and Plaintiffs' response thereto	Other Motions
05/27/2025	Mark Johnson	0.5	\$1,150	\$575	zoom mtg w/ GBW, Grunfeld, Yelin, Umpierre re class notice and response to D's notice.	Settlement
05/27/2025	Travis Close	0.2	\$850	\$170	Review and analyze plaintiff's supplemental brief re: preliminary approval of class settlement	Case Organization, Planning and Strategy
05/28/2025	Guy Wallace	0.7	\$1,350	\$945	com's with GG; JY; BU; MTJ re notice plan and identification of residents with vision disabilities	Other Motions
05/29/2025	Guy Wallace	0.5	\$1,350	\$675	com's with GG; JY re notice to the class, proposed notice plan	Other Motions
05/29/2025	Travis Close	0.4	\$850	\$340	Review and analyze plaintiffs' supplemental brief re: class notice	Case Organization, Planning and Strategy
05/30/2025	Guy Wallace	1.0	\$1,350	\$1,350	com's with Goodwin; GG; JY; BU; MTJ re notice to class members who are low vision & Defendants' proposal re same and response thereto	Other Motions
05/30/2025	Guy Wallace	0.3	\$1,350	\$405	com's with Waters; Mastin; MTJ re Defendants' proposed plans for access work at Brookhurst	Settlement

Date	Initials	Hours	Rate	Amount	Description	ProjectName
06/02/2025	Guy Wallace	1.1	\$1,350	\$1,485	com's with GG; Waters; Mastin; LMD; MTJ re Defendants' proposed neutral experts, Casper & Moe	Settlement
06/09/2025	Guy Wallace	0.8	\$1,350	\$1,080	com's with Waters; Mastin; GG; JY; BU; MTJ re review of Brookhurst plans; selection of neutral expert; review and analysis of settlement agreement re same	Settlement
06/09/2025	Guy Wallace	0.6	\$1,350	\$810	review and analysis of settlement provisions re access work for Brookhurst facility; com's with Waters; MTJ re same	Settlement
06/10/2025	Guy Wallace	1.9	\$1,350	\$2,565	review and analysis of Order from District Court Directing Supplemental Briefing; com's with ER; GG; BU; MTJ; JAU re same	Other Motions
06/10/2025	Guy Wallace	2.1	\$1,350	\$2,835	legal research and analysis re definition of disability under ADA Amendments Act; U.S. DOJ regulations re disability and auxiliary aids; case law re low vision or visually impaired	Other Motions
06/10/2025	Guy Wallace	1.3	\$1,350	\$1,755	com's with LMD; SG; BU; MTJ re definition of disability under the ADA Amendments Act; declaration and deposition testimony of Dr. Flores	Other Motions
06/10/2025	Jennifer Bybee	0.2	\$925	\$185	Com's with GBW re research needed on whether people who use glasses or contacts but whose vision does not correct to 20/20 are considered disabled; email RLS assignment re same	Misc. Research
06/10/2025	Rachel Steyer	0.1	\$750	\$75	reviewing order re supplemental briefing for low vision/mobility class	Settlement
06/10/2025	Rachel Steyer	0.1	\$750	\$75	reviewing forwarded correspondence from JUB with Flores depo excerpts re low vision w/r/t ADA	Misc. Research
06/10/2025	Rachel Steyer	2.0	\$750	\$1,500	research into on low vision vis a vis ADAAA	Settlement
06/10/2025	Rachel Steyer	0.2	\$750	\$150	call with GBW re status of visual impairment research	Misc. Research

Date	Initials	Hours	Rate	Amount	Description	ProjectName
06/11/2025	Guy Wallace	2.4	\$1,350	\$3,240	legal research and analysis re definition of disability; ADA Amendments Act; case law re low vision or visual impairment	Other Motions
06/11/2025	Guy Wallace	2.3	\$1,350	\$3,105	legal research and analysis re ADA Amendments Act; EEOC and DOJ regulations and guidances re definition of disability as it pertains to low vision	Other Motions
06/11/2025	Guy Wallace	2.1	\$1,350	\$2,835	preparation and drafting of outline of supplemental brief re notice to subclass members with disabilities	Other Motions
06/11/2025	Guy Wallace	0.6	\$1,350	\$810	zoom with Rutner; Jacobsen; GG; BU re notice to class members with vision disabilities	Other Motions
06/11/2025	Guy Wallace	0.7	\$1,350	\$945	preparation and drafting of stipulation and order re notice plan for persons with vision disabilities	Other Motions
06/11/2025	Guy Wallace	0.3	\$1,350	\$405	com's with Waters; Mastin re review of Defendants' proposed plan re Brookhurst	Settlement
06/11/2025	Rachel Steyer	0.3	\$750	\$225	reviewing definition of disability circulated by GBW re supplemental briefing on low vision	Misc. Research
06/11/2025	Rachel Steyer	0.1	\$750	\$75	reviewing internal correspondence btwn MTJ, GBW, BSU re Flores testimony re low vision	Misc. Research
06/11/2025	Rachel Steyer	0.1	\$750	\$75	response to JUB and GBW re status of low vision ADA research	Misc. Research
06/11/2025	Rachel Steyer	3.6	\$750	\$2,700	further research into meaning of low vision for ADA supplemental briefing	Settlement
06/11/2025	Rachel Steyer	0.1	\$750	\$75	reviewing email from GBW re EEOC guidance on visual mitigation	Misc. Research
06/11/2025	Rachel Steyer	0.1	\$750	\$75	call with GBW re low vision research	Misc. Research
06/12/2025	Guy Wallace	1.3	\$1,350	\$1,755	preparation and drafting of proposed stipulation and order re plan of notice for subclass members with vision disabilities	Other Motions

Date	Initials	Hours	Rate	Amount	Description	ProjectName
06/12/2025	Guy Wallace	0.9	\$1,350	\$1,215	com's with Goodwin; Rutner; GG; BU; MTJ re draft stipulation and proposed order re notice plan re residents with vision disabilities	Other Motions
06/12/2025	Guy Wallace	1.0	\$1,350	\$1,350	review and analysis of Rutner edits to draft stipulation and proposed order re notice plan re residents with vision disabilities; revise and edit same to prepare final draft	Other Motions
06/12/2025	Rachel Steyer	0.2	\$750	\$150	reviewing stipulation and order re notice to low vision class members	Settlement
06/13/2025	Guy Wallace	0.4	\$1,350	\$540	review and analysis of Order from J. Gilliam granting preliminary approval; com's with GG; BU; MTJ re same	Other Motions
06/13/2025	Rachel Steyer	0.5	\$750	\$375	reviewing order re preliminary approval	Settlement
06/13/2025	Travis Close	0.3	\$850	\$255	Review and analyze court's order granting prelim approval of class action settlement	Case Organization, Planning and Strategy
06/16/2025	Guy Wallace	0.5	\$1,350	\$675	review and analysis of proposed schedule re final approval and Rule 23(h) motion; com's with GG; BU re same	Other Motions
06/16/2025	Mark Johnson	0.3	\$1,150	\$345	call w/ Rita Stiner re status of settlement, proposed schedule.	Settlement
06/16/2025	Rachel Steyer	0.1	\$750	\$75	reviewing draft stipulation and proposed order re settlement approval deadlines	Settlement
06/23/2025	Guy Wallace	0.5	\$1,350	\$675	com's with MTJ; JAU re preparation for Rule 23(h) motion	Other Motions
06/23/2025	Guy Wallace	0.5	\$1,350	\$675	review and analysis of Waters review of Defendants' proposed plan for access work at Brookhurst; com's with Goodwin; GG re same	Settlement
06/24/2025	Travis Close	1.1	\$850	\$935	Draft email to June Kailes answering further questions about the emergency evacuation relief, and terms of implementation in settlement agreement	Case Organization, Planning and Strategy

Date	Initials	Hours	Rate	Amount	Description	ProjectName
06/26/2025	Rachel Steyer	0.2	\$750	\$150	fielded call from family member of MN resident, discussed case disposition and resources	No Charge
07/01/2025	Guy Wallace	0.3	\$1,350	\$405	com's with Waters re Defendants' initial plans re access work at Brookhurst facility	Settlement
07/01/2025	Guy Wallace	0.4	\$1,350	\$540	com's with Goodwin; Rutner; BBK re comments on initial plans for Brookhurst; proposals re selection of joint neutral expert	Settlement
07/13/2025	Guy Wallace	1.1	\$1,350	\$1,485	preparation of key arguments re Rule 23(h) motion for fees and costs; results achieved, history of settlement negotiations, scope of litigation post-March 30, 2023	Other Motions
07/15/2025	Guy Wallace	0.9	\$1,350	\$1,215	review and analysis of draft declaration of GCG re Rule 23(h) motion; com's with BU; Marks; JAU re preparation of Rule 23(h) and motions of counsel re same	Other Motions
Total		24,245.4		\$24,851,310		