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[Additional counsel listed on next page]

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CHRISTIAN RODRIGUEZ, ALBERTO CAZAREZ, individually and as class representatives

Plaintiffs,

vs.

CITY OF LOS ANGELES, CARMEN TRUTANICH, CHARLES BECK, ALLAN NADIR, ANGEL GOMEZ AND DOES 1 THROUGH 10.

Defendants.

Case No.: CV11-01135 DMG (JEMx)

[Assigned to the Honorable Dolly M. Gee – Courtroom 7]

COMPENDIUM OF EVIDENCE IN SUPPORT OF PLAINTIFFS' MOTION FOR ATTORNEY FEES

[VOLUME 3 OF 5]

DATE: December 2, 2016
TIME: 2:00 p.m.
CRTRM: 7

[Filed concurrently herewith: 1) Pltfs' Mtn for Attorney's Fees; 2) Ntc of Lodging; and, 3) [Proposed] Order]

Complaint Filed: February 7, 2011

[Additional counsel cont. from first page]

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Exhibit	Description	Bates No(s).
	dated March 16, 2016	
E	Declaration of Leticia M. Kimble, dated October 11, 2016	580 - 581
F	Declaration of Christopher Tayback, dated October 5, 2016	582 - 583
Acosta Decl.	Declaration of Yesenia Acosta in support of Plaintiffs' Motion for Attorney's Fees, signed October 13, 2016	584
A	Receipts for Expenses of Public Counsel	585 - 620
Hake Decl.	Declaration of William Hake in support of Plaintiffs' Motion for Attorney's Fees, signed October 11, 2016	621- 624
Litt Decl.	Declaration of Barry Litt in support of Plaintiffs' Motion for Attorney's Fees, signed October 11, 2016	625 - 657
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2	Order Granting Plaintiffs' Motion For Award Of Attorneys' Fees And Costs Against Defendant filed in *Long Beach Area Peace Network v. City of Long Beach*, dated July 10, 2012	1112 - 1119
3	Civil Minute Order Granting Plaintiff's Motion for Attorneys' Fees and Liquidated Damages filed in *Avila v. LAPD, et al,* dated August 2, 2012	1120 - 1131

Exhibit	Description	Bates No(s).
4	Order Granting Plaintiffs' Application for Reasonable Attorneys' Fees and Costs filed in *Communities Actively Living Independent and Free v. City of Los Angeles*, dated June 10, 2013	1132 - 1139
5	Declaration Of Laurence W. Paradis in Support of Defendant/Appellee's Motion For Attorneys' Fees And Costs filed in *Los Angeles Unified School District v. Michael Garcia*, dated February 25, 2014	1140 - 1156
6	Declaration of Mary-Lee Smith in Support of Plaintiff's Notice of Motion and Motion for Reasonable Attorneys' Fees and Costs filed in *G.F, et al. v. Contra Costa County, et al.*, dated September 29, 2015	1157 - 1165
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8	Declaration of Carol Sobel in Support of Plaintiff's Motion for Attorneys' Fees filed in *Gonzalez, et al. v. Holder, Jr., et al.*, dated July 31, 2015	1190 - 1212
9	Order Granting in Part Plaintiff Uldis Luste's Motion for Attorneys' Fees filed in *Luste, et al. v. Dr. Jeffrey Taranto Eyecare, et al.*, dated June 7, 2016	1213 - 1215
10	Declaration of Hannah Cannom in Support of Defendant Michael Garcia's Motion for Reasonable Attorney's Fees and Costs filed in *Los Angeles Unified School District, v. Garcia*, dated February 25, 2014	1216 - 1222
11	Declaration of Amy Lally in Support of Plaintiffs' Motion for Attorneys' Fees filed in *Jones, et al. v. Upland Housing Authority, et al.*, dated February 24, 2014	1223 - 1226
12	Declaration of Michael H. Steinberg in Support of Plaintiffs' Motion for Attorneys' Fees filed in *Gonzalez, et al. v. Holder, Jr., et al.*, dated July 31, 2015	1227 - 1259

OLU K. ORANGE, ESQ. -- ATTORNEY

DATE	DESCRIPTION OF TIME	WORKED	BILLED
10/11/2016	[PR] [preparation and drafting] edit fee decl re my office and interns	1.6	1.6
10/11/2016	[PN] [phone conference] call w DS re edits to my fee dec	0.4	0.4
10/11/2016	[PR] [preparation and drafting] eml to co-counsel re question from fee expert	0.1	0.1
10/11/2016	[PN] [phone conference] call w co-counsel re fee motion edits	0.9	0.9
10/11/2016	[PN] [phone conference] call w DS re fee dec edits	0.2	0.2
10/11/2016	[PN] [phone conference] call w AR re fee dec edits	0.2	0.2
10/11/2016	[PN] [phone conference] call w co-counsel re div of labor on fee motion edits	0.7	0.7
10/10/2016	[PR] [preparation and drafting] addtl drafting re fee dec re my office and interns	2.4	2.4
10/10/2016	[PN] [phone conference] call w co-counsel re fee motion edits	0.8	0.8
10/9/2016	[PR] [preparation and drafting] edit fee decl re my office and interns	1.2	1.2
10/9/2016	[RV] [review materials] rvw fee motion re-draft	1.1	1.1
10/8/2016	[PR] [preparation and drafting] edit fee decl re my office and interns	1.9	1.9
10/8/2016	[RS] [research] rsch re federal multiplier or enhancement v. state multiplier	3.1	3.1
10/8/2016	[PR] [preparation and drafting] eml to cocounsel re undesirability and unusual difficulty	0.3	0.3
10/7/2016	[PR] [preparation and drafting] draft fee decl re my office	2.6	2.6
10/7/2016	[PN] [phone conference] call w/ AR re fee dec auth and expert	0.2	0.2
10/7/2016	[PN] [phone conference] call w co-counsel re fee decl	0.2	0.2

10/6/2016	[PR] [preparation and drafting] draft fee decl re my office and interns	3.1	3.1
10/6/2016	[RV] [review materials] eml from olney re stormer decl	0.2	0.2
10/5/2016	[PR] [preparation and drafting] draft fee decl re my office and interns	2.2	2.2
10/5/2016	[RV] [review materials] eml re staff at H&S and fee exclusions	0.1	0.1
10/5/2016	[RV] [review materials] eml from Gilbert re firm change	0.1	0.1
10/4/2016	[RV] [review materials] eml from AR re fee dec inclusions/exclusions	0.1	0.1
10/4/2016	[PR] [preparation and drafting] eml to olney re content of my fee dec	0.6	0.6
10/3/2016	[PN] [phone conference] call w co-counsel re fee decl	0.3	0.3
10/1/2016	[PR] [preparation and drafting] draft and propose further fee motion edits re 1021.5	2.3	2.3
10/1/2016	[RV] [review materials] rvw fee motion draft from AH and propose edits	1.3	1.3
10/1/2016	[RV] [review materials] rvw fees disclosed to City	2.1	2.1
10/1/2016	[RV] [review materials] rvw eml from expert re relevant community	0.3	0.3
9/30/2016	[PR] [preparation and drafting] eml re sending fees to defs	0.1	0.1
9/30/2016	[PN] [phone conference] call w/ dan re fee decs	0.1	0.1
9/6/2016	[CN] [conference] co counsel conf call re fee motion and div of labor	1.1	1.1
9/4/2016	[CN] [conference] meeting w nlg law students re case and removal hearings	0.7	0.7
9/2/2016	[PN] [phone conference] call w assoc dean at USC law re law student reps in removal hearings	0.8	0.8
9/1/2016	[RV] [review materials] rvw mills letter from Cindy	0.3	0.3
8/31/2016	[RV] [review materials] rvw letter from rena from j lucero. non-class member. riverside	0.2	0.2
8/31/2016	[NC] [other non-court] revamp website to track class notice lang and post all latest docs and events	2.3	2.3

8/29/2016	[PR] [preparation and drafting] prep email to anne re lang to creditors for alberto	0.3	0.3
8/26/2016	[RV] [review materials] ltr from rena re fee motion and contacting dan	0.5	0.5
8/23/2016	[CN] [conference] call w anne and probate atty re probt ct approvl	0.4	0.4
8/18/2016	[NC] [other non-court] modify gangcase.com website re correct class notices (spanish)	0.5	0.5
8/17/2016	[CN] [conference] mtg w judge morrow anne and ah re probate ct apprvl	0.8	0.8
8/15/2016	[RV] [review materials] rvw artcl re failures to remove persons from gang databases	0.4	0.4
8/13/2016	[CN] [conference] co-counsel meeting re outstanding issues	1.9	1.9
8/12/2016	[CN] [conference] meeting with USC Law dean re law students for removal hearings	0.6	0.6
8/12/2016	[PR] [preparation and drafting] prep calc re fee motn timing to eml to stormer	0.3	0.3
8/11/2016	[RV] [review materials] rvw eml from rena re fee motion sched	0.1	0.1
8/8/2016	[RV] [review materials] rvw AH proposed website notice revisions	0.2	0.2
8/5/2016	[NC] [other non-court] modify virtual pbx. add new lines for menu for class members re settlement questions to CAC	1.3	1.3
8/5/2016	[RV] [review materials] rvw final class notices for posting. long and short forms. both languages	0.6	0.6
8/4/2016	[RV] [review materials] rvw of english notice and spanish notice re class settlement	0.8	0.8
8/2/2016	[RV] [review materials] rvw eml re error in notices	0.1	0.1
8/1/2016	[RV] [review materials] rvw of email to ct and opt outs	0.7	0.7
7/29/2016	[MO] [motion hearing] Hearing re prelim approval	1.6	1.6
7/27/2016	[CN] [conference] Confer with Anne, Dan, Cindy, Alisa re prelim approval	1.8	1.8

7/14/2016	[RV] [review materials] rvw Sanchez re CA gang expert evid	1.1	1.1
7/3/2016	[NC] [other non-court] update gangcase website	1.2	1.2
7/1/2016	[PR] [preparation and drafting] rvw and edit mot prelim apprvl and exhibits final versions for filing	2.7	2.7
7/1/2016	[NC] [other non-court] update gangcase website	2.1	2.1
7/1/2016	[PR] [preparation and drafting] rvz dec re mot prelim apprvl to include lang from j walsh	0.3	0.3
6/30/2016	[PR] [preparation and drafting] eml to rena re opposition to extra time to oppose fee appl	0.6	0.6
6/30/2016	[PR] [preparation and drafting] eml to j walsh re stip to use hearing lang	0.3	0.3
6/30/2016	[PR] [preparation and drafting] further rvz stip to use j walsh lang	0.3	0.3
6/30/2016	[PR] [preparation and drafting] rvz stip to use j walsh lang	0.5	0.5
6/30/2016	[PR] [preparation and drafting] dec re mot prelim apprvl	1.7	1.7
6/30/2016	[RV] [review materials] rvw hartz re-edits to attys fees section of mot prelim apprvl	0.3	0.3
6/29/2016	[PR] [preparation and drafting] drft stip to unseal hearing language from judge walsh	1.1	1.1
6/29/2016	[PR] [preparation and drafting] rvw edit revised mot prelim apprvl docs	1.1	1.1
6/29/2016	[RV] [review materials] rvw revised stormer dec re prelim apprvl	0.3	0.3
6/28/2016	[PN] [phone conference] call w rena re stip for language from judge walsh, mot prelim apprvl issues	0.4	0.4
6/28/2016	[RV] [review materials] rvw stormer dec re prelim apprvl	0.3	0.3
6/28/2016	[CN] [conference] conf call w court re expedited remvl process and unsealing tscrpts	0.7	0.7
6/28/2016	[RV] [review materials] rvw hearing transcrpts re unsealing	1.7	1.7
6/27/2016	[RS] [research] rsch standard of proof and hearsay issue re gang cases re FRE 702/703	2.7	2.7

6/27/2016	[CN] [phone conference] Phone conference with all plaintiffs counsel re motion for preliminary approval.	0.7	0.7
6/24/2016	[PR] [preparation and drafting] draft and edit eml to court re issues remaining w removal process	0.6	0.6
6/23/2016	[CN] [conference] All counsel meeting at Pub Couns re mot for prelim approval and removal program	2.1	2.1
6/20/2016	[RV] [review materials] rvw and edit expedited removal process	0.9	0.9
6/20/2016	[PN] [phone conference PR] [p] call w/ hartz re mot prelim apprvl expl of substantive injunctive relief	0.3	0.3
6/16/2016	[RV] [review materials] rvw panuco edits to mot prelim apprv docs	0.3	0.3
6/16/2016	[RV] [review materials] rvw re-edited mot prelim apprv docs	0.7	0.7
6/9/2016	[RV] [review materials] rvw eml from randy re CAC letter	0.1	0.1
6/8/2016	[RV] [review materials] rvw mot prelim appr exbts and docs -- new finl drft	2.2	2.2
6/6/2016	[RV] [review materials] rvw final drft motion prelim apprvl exbts	1.8	1.8
6/6/2016	[CN] [phone conference] Call w/ AR and DS re atty fees and letters of direction, structuring and City position	0.7	0.7
6/3/2016	[PR] [preparation and drafting] emls anne and dan re meeting re decls	0.2	0.2
6/2/2016	[RV] [review materials] rvw letter to city re jobs program	0.4	0.4
6/2/2016	[RV] [review materials] rvw and edit drft motion for prelim approval	1.2	1.2
5/31/2016	[PR] [review materials] Review City redlines to removal process doc. Rsch Englebrecht and other foundational cases applicable to disc.	1.4	1.4
5/31/2016	[CN] [conference] Meeting w/ ACLU and AR re gang injunction settlement and case strategy	2.7	2.7
5/31/2016	[CN] [phone conference] Conf call w/ Judge Walsh and all counsel re expedited removal process disagreements	1.2	1.2
5/27/2016	[CN] [conference] Meeting with all counsel at city attys office re motion for prelim approval, jobs program, removal process	2.1	2.1

5/19/2016	[PN] [phone conference] call w dan re fee motion strategy	0.4	0.4
5/17/2016	[PN] [phone conference] call w stormer re comm orgs and city req for fee recs	0.3	0.3
5/13/2016	[RV] [review materials] rvw comm org letter re settlment concers and objectives	0.8	0.8
5/13/2016	[PR] [preparation and drafting] eml re panuco fees question	0.1	0.1
5/13/2016	[CN] [phone conference] conf call w/ AR re settlement details and letter from community orgs	0.3	0.3
5/12/2016	[RS] [research] rvw stetson, stanger, other cases re attorneys fees	2.1	2.1
5/11/2016	[PR] [preparation and drafting] emls w dan re multiplier and anne	0.6	0.6
5/10/2016	[CN] [phone conference] all counsel conf call re motion for prelim approval and probate procedure	1.8	1.8
5/9/2016	[PR] [preparation and drafting] emls rena re scheduling meeting with city and saenz -- re scheduling	0.2	0.2
5/6/2016	[PR] [preparation and drafting] eml re scheduling meeting with city and saenz	0.7	0.7
5/4/2016	[RV] [review materials] rvw judge gee order re scheduling	0.1	0.1
5/3/2016	[RV] [review materials] review jnt status rpt final	0.3	0.3
5/3/2016	[PR] [preparation and drafting] emails w rena re probate court re alberto	0.6	0.6
4/29/2016	[PR] [preparation and drafting] Run rept of hours worked for dist to co-counsel	0.4	0.4
4/29/2016	[CN] [conference] Conf w/ AR and DS re atty fees and fee motion	1.7	1.7
4/28/2016	[RV] [review materials] rvw AR and AH costs	0.1	0.1
4/28/2016	[RV] [review materials] rvw draft joint status rept from AR & Rena	0.2	0.2
4/27/2016	[PN] [phone conference] Call w DS re atty fee motion	0.3	0.3

4/27/2016	[RV] [review materials] rvw class notice, settlement agreement and exhibit to settlement agreement	1.8	1.8
4/26/2016	[PN] [phone conference] conf call w AR, AH, DS, CP re meeting with City re jobs program and re fees	0.9	0.9
4/20/2016	[PN] [phone conference] Call w Rena re meeting re stllement agreement and jobs program implementation	0.4	0.4
4/15/2016	[PR] [preparation and drafting] rsrch and lettr re probate situation re Cazarez	2.7	2.7
4/14/2016	[RV] [review materials] rvw probate memo re Cazarez from DS	0.4	0.4
4/11/2016	[PN] [phone conference] call w/ AH re most recent comm org meeting re settlement implementation	0.4	0.4
4/11/2016	[RV] [review materials] rvw notes from last community org meeting re settlement implementation	0.8	0.8
4/5/2016	[RV] [review materials] email from AR re cy pres	0.1	0.1
4/4/2016	[PR] [preparation and drafting] review and edit notice to class and settlement agreement – description of removal process	0.9	0.9
4/1/2016	[CN] [phone conference] call w richardson re settlement agreement and exhibits	0.2	0.2
4/1/2016	[CN] [phone conference] call w stormer re settlement agreement and exhibits	0.3	0.3
4/1/2016	[PR] [review materials] rvw settlement agreement exhibit draft and prep edits	0.8	0.8
4/1/2016	[PR] [review materials] rvw settlement agreement draft and prep edits	1.4	1.4
3/31/2016	[PR] [preparation and drafting] G120 form to order transcripts per J Walsh instructions	0.2	0.2
3/28/2016	[CN] [phone conference] Phone conf with AR , CP , re meeting with community organizations re settlement	0.4	0.4
3/28/2016	[CN] [conference] Meeting with AR , CP , and community organizations re settlement and implementation	2.6	2.6
3/25/2016	[CN] [conference] Meet w Vitaly re settlement implementation in mvg and neighborhood kids	1.9	1.9
3/25/2016	[CN] [phone conference] Conf w Judge Walsh and counsel re settlement wrap up and unsealing transcript	0.5	0.5

3/23/2016	[CN] [phone conference] Call w Chris re settlement implementation and meeting w Vitaly	0.9	0.9
3/21/2016	[CN] [phone conference] Call with Alex Sanchez from Homies Unidos and CP re community org participation and radio show re settlement to give notice	0.6	0.6
3/15/2016	[RV] [review materials] rvw final press release re case. question re numbers across top	0.1	0.1
3/14/2016	[PR] [preparation and drafting] eml to r wilcox re joint city press release and krekorian quote	0.1	0.1
3/14/2016	[RV] [review materials] rvw city joint press release from r wilcox	0.3	0.3
3/14/2016	[PR] [preparation and drafting] eml to AR re press release by pltfs	0.2	0.2
3/13/2016	[PN] [phone conference] call w carol sobel re atty fee rates	0.9	0.9
3/12/2016	[RV] [review materials] rvw cny of LA decision re atty rates	1.7	1.7
3/11/2016	[RV] [review materials] prep for hearing w j walsh re settlement	1.1	1.1
3/11/2016	[MO] [court hearing] hearing w j walsh re settlement differences	2.1	2.1
3/10/2016	[PR] [preparation and drafting] letter to j. walsh and t peters re gangi injunction work exceptions	0.7	0.7
3/9/2016	[RS] [research] rvw of all city's gang injunctions for work exception	2.3	2.3
3/6/2016	[PR] [preparation and drafting] eml to t peters re carpooling allowance for settlement program	0.2	0.2
3/5/2016	[RV] [review materials] rvw of city's newest gang injunctions for work exception	1.2	1.2
3/4/2016	[PN] [phone conference] call w rena re settlement agreement draft	0.4	0.4
3/4/2016	[MO] [court hearing] prep and hearing with judge walsh re differences in settlement	1.9	1.9
3/4/2016	[RV] [review materials] rvw of proposed appendix from rena	1.1	1.1

3/3/2016	[CN] [conference] conference with co-cnsl re: settlement conference hearing	0.9	0.9
3/3/2016	[PN] [phone conference] Call w rena re settlement agreement draft details	0.6	0.6
3/3/2016	[PN] [phone conference] Call w rena re settlement agreement draft	0.4	0.4
3/3/2016	[PN] [phone conference] Call w rena re settlement agreement draft details	0.6	0.6
3/3/2016	[PN] [phone conference] Call w rena re settlement agreement draft	0.4	0.4
3/2/2016	[PN] [phone conference] Call w rena re settlement agreement draft	0.4	0.4
3/2/2016	[PN] [phone conference] Call w rena re settlement agreement details	0.1	0.1
3/2/2016	[PN] [phone conference] Call w rena re settlement agreement details	0.3	0.3
3/2/2016	[PN] [phone conference] Call w rena re settlement agreement draft	0.4	0.4
3/2/2016	[PN] [phone conference] Call w rena re settlement agreement details	0.1	0.1
3/2/2016	[PN] [phone conference] Call w rena re settlement agreement details	0.3	0.3
3/2/2016	[RV] [review materials] rvw of la city personnel policy re criminal records	0.9	0.9
3/2/2016	[NC] [other non-court] comm w ct clerk re next date w judge walsh	0.2	0.2
3/2/2016	[NC] [other non-court] comm w def counsel re next date w judge walsh	0.4	0.4
3/2/2016	[NC] [other non-court] comm w pltf counsel re next date w judge walsh	0.3	0.3
3/2/2016	[CN] [phone conference] conf call w DS AS and aclu re procedural matters re case	0.4	0.4
3/1/2016	[PN] [phone conference] Call w rena re settlement agreement differences	0.5	0.5
3/1/2016	[PN] [phone conference] Call w rena re settlement agreement differences	0.5	0.5

3/1/2016	[NC] [other non-court] comm w def counsel re next date w judge walsh	0.7	0.7
3/1/2016	[NC] [other non-court PN] [phone] comm w ct re next date w judge walsh	0.3	0.3
3/1/2016	[NC] [other non-court] comm w pltf counsel re next date w judge walsh	0.6	0.6
2/29/2016	[PN] [phone conference] Call w rena re settlement agreement differences	0.6	0.6
2/29/2016	[PN] [phone conference] Call w rena re settlement agreement differences	0.7	0.7
2/29/2016	[PN] [phone conference] Call w rena re settlement agreement differences	0.6	0.6
2/29/2016	[PN] [phone conference] Call w rena re settlement agreement differences	0.7	0.7
2/29/2016	[PN] [phone conference] conf call AR and DS re next steps re agenda item for settlement and community orgs for list	0.5	0.5
2/29/2016	[PN] [phone conference] conf call all counsel re differences in understanding of settlement terms. agenda item continued	1.6	1.6
2/29/2016	[PN] [phone conference] conf call w rena AR AH re appendix	0.7	0.7
2/29/2016	[RV] [review materials] rvw draft appendix from rena	0.7	0.7
2/29/2016	[RV] [review materials] rvw notice of non-enforcement from rena	0.1	0.1
2/27/2016	[PR] [preparation and drafting] proposed edits to city joint press release	0.3	0.3
2/27/2016	[RV] [review materials] rvw AH proposed edits to city joint press release	0.2	0.2
2/27/2016	[RV] [review materials] rvw city proposed joint press release	0.6	0.6
2/26/2016	[PN] [phone conference] all counsel conf call re press	0.4	0.4
2/25/2016	[PR] [preparation and drafting] eml re all counsel phone call re press	0.1	0.1

2/25/2016	[PR] [preparation and drafting] edits to plntf side press release	0.6	0.6
2/25/2016	[RV] [review materials] rvw la city council agenda	0.3	0.3
2/24/2016	[PR] [preparation and drafting] email re kim and settlement agreement	0.1	0.1
2/22/2016	[RV] [review materials] rvw draft plnt press release	0.4	0.4
2/19/2016	[RV] [review materials] rvw lacity web entry re case	0.3	0.3
2/17/2016	[PN] [phone conference] conf call AR rena re press, draft settlement docs, clarify jobs	0.6	0.6
2/16/2016	[PN] [phone conference] Call with court and AR, AH, CP	0.2	0.2
2/16/2016	[CN] [conference] conference with co-counsel re: settlement conference with Judge Walsh	1.1	1.1
1/25/2016	[PN] [phone conference] Call w AH re settlement terms	0.2	0.2
1/25/2016	[CN] [conference] conference with co-counsel re case status	0.5	0.5
1/24/2016	[RS] [research] rsch re common fund attys fees	2.2	2.2
1/18/2016	[RV] [review materials] rvw AR email re kim	0.2	0.2
1/15/2016	[CN] [conference] meeting with co-counsel re: preparation	0.5	0.5
1/15/2016	[PN] [phone conference] call w judge walsh	0.1	0.1
1/14/2016	[CN] [conference] meeting re media w/ AR CP DS	1.3	1.3
1/13/2016	[CN] [conference] Con with AR, Dan re City Attorneys' request to see plaintiffs' fees before approval of settlement	0.5	0.5
1/13/2016	[PN] [phone conference] call w rena re attys fees	0.2	0.2
1/8/2016	[PR] [preparation and drafting] emls re next meeting with j walsh	0.3	0.3
1/6/2016	[CN] [phone conference] Conf call with jduge walsh and co-counsel and opp counsel re settlement	0.4	0.4
1/4/2016	[RV] [review materials] rvw transcript of hearing with judge walsh re settlement on record	2.1	2.1

12/21/2015	[CN] [phone conference] call w/ ds and ar re settlement and clients thoughts	0.3	0.3
12/18/2015	[CN] [phone conference] call w/ peters re city council	0.5	0.5
12/16/2015	[CN] [phone conference] Call w/ AR and AH re settlement explanation to class members	0.2	0.2
12/15/2015	[CN] [phone conference] Conf call w/ class members and all plaintiff's counsel	1.1	1.1
12/11/2015	[NC] [other non-court] set-up conf call no. for call re settlement status w/ community orgs and class members	0.1	0.1
12/11/2015	[CN] [phone conference] call w/ all co-counsel re settlement status and community orgs	0.8	0.8
12/9/2015	[CN] [conference] meeting w/ cp, Emilia Cazarez and Alan Cazarez re estate's claim / damages	2.2	2.2
12/8/2015	[PN] [phone conference] Call w AH re class member meeting	0.2	0.2
12/3/2015	[CN] [phone conference] call w/ AR re emilia cazarez and whether to sub in Alexa as RPI for Alberto estate	0.4	0.4
12/2/2015	[CN] [phone conference] call w/ court & counsel re settlement status	0.4	0.4
12/2/2015	[CN] [phone conference] call w/ cp re class rep estate admin status	0.5	0.5
12/1/2015	[CN] [phone conference] call w/ ar re community org meeting re settlement/confidentiality	0.2	0.2
12/1/2015	[CN] [phone conference] call w/ ar re community org meeting re settlement/confidentiality	0.2	0.2
11/30/2015	[CN] [conference] Con with AR re class member notification	0.5	0.5
11/19/2015	[CN] [phone conference] discuss purported cazarez decl with AR	0.7	0.7
11/19/2015	[PR] [review materials] rvw purported cazarez decl	0.3	0.3
11/17/2015	[PR] [review materials] review blasi bio	0.3	0.3
11/17/2015	[CN] [phone conference] Call w/ ar re comm orgs and settlement	1.3	1.3
11/17/2015	[CN] [phone conference] Call w/ ar and ds re comm orgs and settlement	0.9	0.9

11/16/2015	[CN] [phone conference] call w/ peters re city resolution and daughters college fund	0.4	0.4
11/16/2015	[CN] [conference] meet w/ chris and alan and AR (part) re city resolution and daughters college fund	2.2	2.2
11/13/2015	[CN] [phone conference] Call w ar re community organizations re settlement	0.2	0.2
11/13/2015	[CN] [phone conference] Call w ds re Peters re settlement	0.2	0.2
11/13/2015	[CN] [phone conference] Call w Peters re settlement	0.3	0.3
11/12/2015	[CN] [conference] Con with AR, AH re settlement issues	0.4	0.4
11/11/2015	[CN] [phone conference] call w ar re city council and direct payment issue	0.2	0.2
11/11/2015	[CN] [phone conference] call w ds re city council and direct payment issue	0.1	0.1
11/11/2015	[CN] [phone conference] call w peters re city council and direct payment issue	0.6	0.6
11/11/2015	[PR] [preparation and drafting] eml peters re city council and LAPD dep chief bill Scott	0.3	0.3
11/10/2015	[NT] [other in court] sttlement conf w judge walsh and all counsel	3.1	3.1
11/6/2015	[PR] [preparation and drafting] drft edits and prep exbts re pltfs proposed settlement ltr	1.7	1.7
11/4/2015	[PR] [preparation and drafting] Txts w DS re settlement	0.3	0.3
11/4/2015	[PN] [phone conference] Call w AR re settlement	0.3	0.3
11/4/2015	[PN] [phone conference] Call w Walsh and all counsel re settlement	0.7	0.7
11/2/2015	[CN] [conference] Con with AR and AH re our proposed response to City	0.6	0.6
11/1/2015	[PR] [preparation and drafting] eml dan re defs sttlment response	1.2	1.2
10/30/2015	[PR] [preparation and drafting] emls co-counsel re defs sttlment response	0.5	0.5

10/30/2015	[RV] [review materials] rvw defs response to redline sttlmnt proposal	0.6	0.6
10/27/2015	[CN] [phone conference] Call w AR and CP re edited draft of pltf settlement proposal changes	0.1	0.1
10/27/2015	[PR] [review materials] rvw edited draft of pltf settlement proposal changes	0.4	0.4
10/26/2015	[CN] [conference] meet w co-counsel re settlement terms	2.1	2.1
10/23/2015	[PN] [phone conference] call w DS re upcoming conf call and unified position	0.3	0.3
10/23/2015	[PN] [phone conference] cpnf call with all counsel and ct. follw up call with co counsel	1.3	1.3
10/22/2015	[PN] [phone conference] calls with co-counsel re case status	0.5	0.5
10/21/2015	[RV] [review materials] eml w opp counsel re proposed settlemt plan	0.6	0.6
10/21/2015	[CN] [conference] AR and AH conf re settlement proposal	0.9	0.9
10/20/2015	[PR] [preparation and drafting] consider / draft questions re city's latest settlement package	1.3	1.3
10/20/2015	[RS] [research] rsch re excl of gang p-nalia	3.1	3.1
10/16/2015	[RV] [review materials] rvw gomez reply re mo dism cazarez claims	0.8	0.8
10/14/2015	[PN] [phone conference] call w counsel and j walsh re settlement	0.4	0.4
10/12/2015	[PR] [preparation and drafting] edit trejo/rodriguez case settlement so as to have no impact on curfew case	2.1	2.1
10/8/2015	[PR] [review materials] Opp re dismissal	1.2	1.2
10/7/2015	[PR] [review materials] Mot re dismissal AC claims	1.5	1.5
10/5/2015	[PR] [preparation and drafting] case strengths / weaknesses assessment	3.2	3.2
10/5/2015	[RV] [review materials] rvw pltf opp to gomez mo dism cazarez claims	0.3	0.3
10/2/2015	[PN] [phone conference] call w counsel and j walsh re settlement	0.3	0.3

9/29/2015	[PR] [preparation and drafting] emls w clerk and counsel re next court call	0.4	0.4
9/25/2015	[PR] [preparation and drafting] review materials & prepare damages notes / strategy	4.2	4.2
9/24/2015	[PR] [preparation and drafting] review materials & prepare damages notes / strategy	1.2	1.2
9/23/2015	[PR] [preparation and drafting] review materials & prepare Chris dx / cx exam notes / strategy	1.2	1.2
9/22/2015	[MO] [court hearing] mediation w counsel and j walsh re settlement	3.3	3.3
9/21/2015	[PR] [preparation and drafting] review materials & prepare Chris dx / cx exam notes / strategy	2.8	2.8
9/21/2015	[PR] [preparation and drafting] review materials & prepare Chris dx / cx exam notes / strategy	3.3	3.3
9/20/2015	[PR] [preparation and drafting] review materials & prepare Chris dx / cx exam notes / strategy	2.3	2.3
9/20/2015	[PR] [preparation and drafting] review materials & prepare Chris dx / cx exam notes / strategy	4.7	4.7
9/18/2015	[CN] [conference] con w AH, AR re City supplemental mediation brief	0.5	0.5
9/18/2015	[CN] [conference] discussion with co-counsel re: settlement	0.5	0.5
9/18/2015	[PR] [preparation and drafting] review materials & prepare evid arg re Guizar tstfy re alberto	3.6	3.6
9/17/2015	[PR] [preparation and drafting] review materials & prepare Guizar dx / cx exam notes / strategy	3.3	3.3
9/17/2015	[PR] [preparation and drafting] review materials & prepare Griffin dx / cx exam notes / strategy	1.4	1.4
9/17/2015	[PR] [preparation and drafting] review materials & prepare Griffin dx / cx exam notes / strategy	2.8	2.8
9/15/2015	[PR] [preparation and drafting] review materials & prepare Paysinger dx / cx exam notes / strategy	2.9	2.9
9/14/2015	[PR] [preparation and drafting] review materials & prepare Paysinger dx / cx exam notes / strategy	2.6	2.6

9/14/2015	[PR] [preparation and drafting] review materials & prepare Paysinger dx / cx exam notes / strategy	1.2	1.2
9/11/2015	[CN] [conference] meet w j. lieberman jury consultant / l. paredes re gang damages approach	4.1	4.1
9/9/2015	[CN] [conference] Chris gang inj remvl IV and prep	1.9	1.9
9/9/2015	[PR] [preparation and drafting] review materials & prepare Tremblay dx / cx exam notes / strategy	4.4	4.4
9/8/2015	[PR] [preparation and drafting] review materials & prepare Gomez dx / cx exam notes / strategy	2.6	2.6
9/8/2015	[PR] [preparation and drafting] emls w panuco re class member messages	0.2	0.2
9/7/2015	[PR] [preparation and drafting] review materials & prepare Tremblay dx / cx exam notes / strategy	1.9	1.9
9/7/2015	[PR] [preparation and drafting] review materials & prepare Tremblay dx / cx exam notes / strategy	3.2	3.2
9/7/2015	[PR] [preparation and drafting] review materials & prepare Gomez dx / cx exam notes / strategy	5.9	5.9
9/4/2015	[PR] [preparation and drafting] review materials & prepare Gomez dx / cx exam notes / strategy	1.2	1.2
9/3/2015	[PR] [preparation and drafting] review materials & prepare Nadir dx / cx exam notes / strategy	4.1	4.1
9/3/2015	[PR] [preparation and drafting] emls w co-cnsl re cy pres	0.8	0.8
9/1/2015	[PR] [preparation and drafting] review materials & prepare Nadir dx / cx exam notes / strategy	2.8	2.8
9/1/2015	[PR] [preparation and drafting] review materials & prepare Nadir dx / cx exam notes / strategy	3.4	3.4
8/31/2015	[CN] [conference] Post mediation debrief w/ AR, Dan, Cindy, AH	0.7	0.7
8/31/2015	[MO] [court hearing] mediation and pre meeting with Walsh and counsel	6.6	6.6
8/28/2015	[CN] [conference] conf w barvosa , james , AR re damages	1.1	1.1
8/27/2015	[RV] [review materials] rvw trejo/rodriguez case for impact on curfew case	1.9	1.9

8/26/2015	[RV] [review materials] rvw pltfs settlement conf brief	0.7	0.7
8/21/2015	[CN] [conference] conference with CP and DS re: confidential brief on damages to the magistrate	1.1	1.1
8/20/2015	[RV] [review materials] rvw plaintiff opp re presumed damages	1.8	1.8
8/20/2015	[RS] [research] rsrch presumed damages	3.7	3.7
8/20/2015	[RV] [review materials] rvw Barvosa rpt re damages	1.9	1.9
8/17/2015	[CN] [conference] Con with Dan, AR re trial and settlement strategy	0.9	0.9
8/11/2015	[RV] [review materials] rvw order re MILs	2.3	2.3
8/11/2015	[RV] [review materials] rvw order re MILs	3.5	3.5
7/31/2015	[PR] [preparation and drafting] emls w co-counsel re sealed portions of juvy record	0.6	0.6
7/23/2015	[PR] [preparation and drafting] edits re opp to gomez suppl briefing	1.8	1.8
7/21/2015	[PN] [phone conference] Call with AH re reply to Gomez supp MIL	0.5	0.5
7/15/2015	[RV] [review materials] rvw gomez' suppl opp	1.6	1.6
7/9/2015	[PN] [phone conference] Contacted DR re: referrals of class members' individual claims	0.9	0.9
7/7/2015	[PR] [preparation and drafting] emls w co-counsel. no CW no MN - suggest Walsh & Mumm	0.4	0.4
7/1/2015	[PR] [preparation and drafting] emls w all counsel re meet and confer	1.2	1.2
7/1/2015	[PR] [preparation and drafting] draft settlement conf referral lingo	0.2	0.2
7/1/2015	[PN] [phone conference] conf call w HS re case strategy	0.7	0.7
6/30/2015	[CN] [conference] conference with MT, CP, and DS re: strategy for approaching supplemental briefings on MIL rulings	0.3	0.3
6/30/2015	[CN] [conference] meet and confer between all parties re: follow up to MIL rulings	0.6	0.6

6/27/2015	[CN] [conference] meet w chris and nbrs re current conditions in mvg	3.2	3.2
6/26/2015	[RV] [review materials] rvw suppl to MIL 1 re ev to exclude	0.8	0.8
6/24/2015	[RV] [review materials] rvw exhibits to exclude in light of msj ruling	0.7	0.7
6/23/2015	[MO] [court hearing] FPCT hearing and meeting of counsel	2.7	2.7
6/23/2015	[PR] [preparation and drafting] Prepare hearing speed sheets	2.2	2.2
6/23/2015	[RV] [review materials] rvw materials prep re MIL hearing - prior test.	1.9	1.9
6/22/2015	[PR] [preparation and drafting] drft opp re ex parte re Beck financial info in trejo	0.7	0.7
6/22/2015	[PR] [preparation and drafting] edit argument notes for MILS	3.1	3.1
6/22/2015	[RV] [review materials] rvw materials prep re MIL hearing - 403 gang	0.5	0.5
6/22/2015	[RV] [review materials] rvw materials prep re MIL hearing - prior test.	5.9	5.9
6/22/2015	[RV] [review materials] rvw materials prep re MIL hearing - wit list	3.2	3.2
6/21/2015	[RV] [review materials] rvw materials prep re MIL hearing - 403 gang	1.9	1.9
6/21/2015	[RV] [review materials] rvw materials prep re MIL hearing - 403 gang	0.7	0.7
6/21/2015	[RV] [review materials] rvw materials prep re MIL hearing - prior test.	4.8	4.8
6/21/2015	[RV] [review materials] rvw materials prep re MIL hearing - wit list	2.5	2.5
6/20/2015	[CN] [conference] conference with co-counsel re: status of who is arguing what aspects of filings at the final pretrial conference	0.7	0.7
6/20/2015	[RV] [review materials] rvw materials prep re MIL hearing - 403 gang	3.3	3.3
6/17/2015	[PN] [phone conference] call with MT re: trial strategy	0.3	0.3

6/12/2015	[CN] [conference] conference with DS, CP, and AR	0.3	0.3
6/12/2015	[NC] [other non-court] depo of chris mom and follow-up	3.6	3.6
6/10/2015	[PN] [phone conference] call w dan re trial availability	0.3	0.3
6/9/2015	[RV] [review materials] rvw chris depo trnascript in trejo for info/flaws re curfew case	1.9	1.9
6/6/2015	[PR] [preparation and drafting] notate revised date sched	0.4	0.4
6/5/2015	[MO] [court hearing] hearing re disc compliance in trejo re LAPD info re chris and Beck financial condition	0.8	0.8
6/2/2015	[PN] [phone conference] call w panuco re excluded wis	0.4	0.4
6/2/2015	[PN] [phone conference] call w AR re wits not on list	0.6	0.6
6/2/2015	[RV] [review materials] rvw def opp to MIL re gang policy	1.2	1.2
6/2/2015	[RV] [review materials] rvw def opp re MIL re word GANG	0.9	0.9
6/2/2015	[RV] [review materials] rvw def opp to pltf MIL re crim history and gang affil	1.3	1.3
6/2/2015	[RV] [review materials] rvw pltf opp MIL 3, 4, 5 snd SR dec	1.8	1.8
6/1/2015	[PR] [preparation and drafting] drft MIL preclude gang affiliation info re chris in trejo	2.1	2.1
6/1/2015	[PR] [preparation and drafting] drft MIL preclude chris crim history in trejo	1.8	1.8
6/1/2015	[PR] [preparation and drafting] dec exbts re opp MIL excl pltfs prior testimony affs	0.8	0.8
6/1/2015	[PR] [preparation and drafting] Opp re MIL excl pltfs prior testimony and affids	1.6	1.6
5/31/2015	[RV] [review materials] rvw MSJ ruling	3.3	3.3
5/31/2015	[RV] [review materials] rvw AC statements and recordings	2.1	2.1
5/31/2015	[RS] [research] rsch FRE 803(1)-(3) / contemporaneous	5.5	5.5

5/31/2015	[PR] [preparation and drafting] Opp re MIL excl pltfs prior testimony and affids	2.4	2.4
5/29/2015	[RV] [review materials] rvw griffin xpt audio	2.1	2.1
5/28/2015	[CN] [conference] conference with co-counsel re: pretrial documents and issues raised by motions	1.3	1.3
5/28/2015	[CN] [conference] griffin conf re case	2.8	2.8
5/28/2015	[NC] [other non-court] griffin depo	3.1	3.1
5/27/2015	[NC] [other non-court] griffin depo prep	2.2	2.2
5/26/2015	[RV] [review materials] rvw gilbert addtns to FPTCO	1.3	1.3
5/26/2015	[PR] [preparation and drafting] MIL re use of word gang	0.9	0.9
5/26/2015	[PR] [preparation and drafting] draft MIL re gang policy	1.7	1.7
5/24/2015	[PR] [preparation and drafting] rvw notate dfs prop spec verdict	0.7	0.7
5/22/2015	[RV] [review materials] rvw city'sadditions to FPTCO, exbt list and wit list	3.3	3.3
5/21/2015	[RV] [review materials] email communication with Co-counsel re: revisions to the Final Pretrial conference order language	0.5	0.5
5/21/2015	[PR] [preparation and drafting] rvw and compare HS depo status chart to mine	0.4	0.4
5/21/2015	[RV] [review materials] rvw MO memo re indiv 4th A claim re gomez and city	0.3	0.3
5/21/2015	[PN] [phone conference] call w MO re 4th a claim re city	0.6	0.6
5/21/2015	[RV] [review materials] rvw/notate jnt trial exbt list	2.3	2.3
5/21/2015	[PR] [preparation and drafting] rvw/notate voir dire from Dan	1.8	1.8
5/20/2015	[PN] [phone conference] call with co-counsel re: damages and certification of class and damages theories	1.2	1.2
5/20/2015	[RV] [review materials] rvw updated FPTCO	3.4	3.4
5/19/2015	[CN] [conference] r16 conf w defs	1.1	1.1
5/19/2015	[RV] [review materials] rvw humberto depo prod objs	0.8	0.8

5/19/2015	[PR] [preparation and drafting] humberto depo prep	2.4	2.4
5/19/2015	[NC] [other non-court] humberto depo	4.3	4.3
5/18/2015	[PN] [phone conference] conf call w HS	1.4	1.4
5/18/2015	[RV] [review materials] rvw emails re depo date revisions and r16 conf	0.9	0.9
5/18/2015	[PR] [preparation and drafting] humberto depo prep	3.1	3.1
5/15/2015	[RV] [review materials] emails with co-counsel re: expert depositions	0.5	0.5
5/14/2015	[RV] [review materials] rvw cont of fact and law	0.8	0.8
5/14/2015	[PR] [preparation and drafting] notes re MIL division of labor	0.4	0.4
5/14/2015	[RV] [review materials] rvw obj to def expt discl	0.4	0.4
5/14/2015	[PR] [preparation and drafting] emls w HS re photos	0.6	0.6
5/13/2015	[CN] [conference] conference with co-counsel re: pretrial preparation	1.1	1.1
5/13/2015	[CN] [conference] met/conf w city re disc compliance in trejo re LAPD info re chris and Beck financial condition	1.7	1.7
5/13/2015	[PR] [preparation and drafting] emls w HS re exhibits	0.7	0.7
5/11/2015	[RV] [review materials] rvw final version of pltf objs to defs JI's	0.8	0.8
5/11/2015	[RV] [review materials] rvw City objs topltfs JI's	2.4	2.4
5/11/2015	[PR] [preparation and drafting] draft objections re defs JI's	1.1	1.1
5/11/2015	[PR] [preparation and drafting] emls w HS re expert availability / preferences	1.4	1.4
5/11/2015	[PR] [preparation and drafting] draft objections to def jury instructions	2.6	2.6
5/10/2015	[PR] [preparation and drafting] emls w HS re MSJ rulings	0.8	0.8
5/9/2015	[RV] [review materials] rvw ct order on MSJs	1.7	1.7

5/8/2015	[PN] [phone conference] call with AC and MT re: MSJ order	0.5	0.5
5/8/2015	[RV] [review materials] rvw ct order on MSJs	2.2	2.2
5/8/2015	[RV] [review materials] rvw ct order on MSJs	4.6	4.6
5/6/2015	[PR] [preparation and drafting] mo compel disc compliance in trejo re LAPD info re chris and Beck financial condition	5.1	5.1
5/5/2015	[NC] [other non-court] depo of gonzalez in trejo / re prior knowledge of chris	3.5	3.5
5/5/2015	[NC] [other non-court] depo of carillo in trejo / re prior knowledge of chris	2.1	2.1
5/5/2015	[RV] [review materials] rvw pltf fin version r26 expert rept	3.1	3.1
5/5/2015	[PR] [preparation and drafting] prep griffin discl package	0.8	0.8
5/5/2015	[RV] [review materials] rvw HG expert rep	0.8	0.8
5/4/2015	[RV] [review materials] rvw expert reports re wit call order	2.6	2.6
5/4/2015	[RV] [review materials] rvw expert reports re wit call order	3.2	3.2
5/4/2015	[RV] [review materials] rvw griffin xpt rept	1.7	1.7
5/4/2015	[RV] [review materials] rvw discuss HG expt rept	2.1	2.1
5/3/2015	[PR] [preparation and drafting] HG email re fee	0.2	0.2
5/1/2015	[PN] [phone conference] call re griffin expt rpt	2.3	2.3
4/27/2015	[PR] [preparation and drafting] prep materials HG expt rept	2.8	2.8
4/27/2015	[RV] [review materials] rvw arrest rpt docs for humberto	0.8	0.8
4/26/2015	[PN] [phone conference] call w humberto re exprt testimony	1.7	1.7
4/26/2015	[PN] [phone conference] humberto call re expert	2.2	2.2
4/25/2015	[PR] [preparation and drafting] prep partial evid map re trial strategy	3.6	3.6

4/24/2015	[PN] [phone conference] call with CP and DS re: expert Humberto Guizar and documents to get to him for his report	0.5	0.5
4/24/2015	[PR] [preparation and drafting] r37 letter re trejo disc re current LAPD info re chris	3.1	3.1
4/24/2015	[RV] [review materials] rvw p-inj ruling	0.7	0.7
4/23/2015	[PN] [phone conference] communication with cocounsel re: re-engaging experts and upcoming deadlines	0.5	0.5
4/22/2015	[RV] [review materials] rvw city discovery re current info re chris in trejo	2.7	2.7
4/16/2015	[PR] [preparation and drafting] emls w HS re continued sttlmnt discussions	0.7	0.7
4/9/2015	[CN] [conference] conference with CP and AR re: filing	0.1	0.1
4/3/2015	[RV] [review materials] rvw settlements and cy pres approach	0.6	0.6
3/30/2015	[NC] [other non-court] case mediation at ADR	8.7	8.7
3/24/2015	[RV] [review materials] rvw def final mediation brief	1.8	1.8
3/23/2015	[PR] [preparation and drafting] prep and serve city with discovery re current info re chris in trejo	5.2	5.2
3/23/2015	[RV] [review materials] rvw pltf final mediation brief	1.6	1.6
3/23/2015	[PR] [preparation and drafting] emls w HS re mediation brief	1.9	1.9
3/20/2015	[PN] [phone conference] Tel call with Dan, AR re cy pres and possible settlement alternatives	1.2	1.2
3/18/2015	[PR] [preparation and drafting] draft edits to mediation brief	0.3	0.3
3/18/2015	[PR] [preparation and drafting] prep for sttlemnt w AH letter and Feuer ltr	1.7	1.7
3/18/2015	[RV] [review materials] rvw settlmnt memo outline	1.6	1.6
3/17/2015	[CN] [conference] meeting with Ana Muniz and MT re: expert report and testimony	2.5	2.5
3/4/2015	[CN] [conference] conference with co-counsel re: experts, mediation, pretrial documents	1.3	1.3

3/4/2015	[RV] [review materials] rvw latest deadline chart	0.5	0.5
3/3/2015	[PN] [phone conference] call re experts w counsel	0.6	0.6
3/2/2015	[RV] [review materials] rvw panuco eml re spector	0.4	0.4
2/27/2015	[PR] [preparation and drafting] emls re munoz expt fee	0.7	0.7
2/26/2015	[CN] [conference] conference with AR, DS, and MT re: setting up meeting with prospective expert witness Ana Muniz	0.3	0.3
2/25/2015	[PN] [phone conference] call with HS re: DS	0.1	0.1
2/25/2015	[PN] [phone conference] call w TP re mediation	0.3	0.3
2/24/2015	[RV] [review materials] rvw ct contin of MSJ dates	0.1	0.1
2/23/2015	[CN] [conference] Meeting with AR and AH on settlement strategies and demands and trial preparation	0.9	0.9
2/23/2015	[RV] [review materials] rvw order re file 3rd amended compl	1.4	1.4
2/21/2015	[PN] [phone conference] call CM re feasibility of jobs education	2.1	2.1
2/18/2015	[PN] [phone conference] call with HS re: docs needed	0.1	0.1
2/18/2015	[PN] [phone conference] call CM re feasibility of jobs education	1.4	1.4
2/18/2015	[RV] [review materials] revw GI policies and guidelines	2.1	2.1
2/13/2015	[PN] [phone conference] confer w hmberto re engagement as expert	1.9	1.9
2/11/2015	[PN] [phone conference] call CM re amount of city hrs pre benefits	1.2	1.2
2/10/2015	[PR] [preparation and drafting] edits re opp gomez ex parte re contin	1.8	1.8
2/10/2015	[PR] [preparation and drafting] opp re gomez ex parte contin.	2.2	2.2
2/10/2015	[PR] [preparation and drafting] opp gomez ex parte	2.9	2.9
2/9/2015	[RV] [review materials] rvw prior court order re contin.	0.4	0.4
2/9/2015	[RV] [review materials] rvw gomez ex parte re cont.	1.3	1.3

2/8/2015	[RV] [review materials] rvw pltfs msj exbts	0.8	0.8
2/5/2015	[PR] [preparation and drafting] eml oppose Gilbert continuance suggestion	0.1	0.1
2/5/2015	[PR] [preparation and drafting] edit mand duty instructions	0.5	0.5
2/5/2015	[RV] [review materials] rvw pltfs msj exbts	3.6	3.6
2/4/2015	[RV] [review materials] rvw MO edits to complete set of JI's	2.7	2.7
2/4/2015	[RV] [review materials] rvw pltfs msj exbts	3.1	3.1
2/4/2015	[RV] [review materials] rvw pltfs msj exbts	4.5	4.5
2/3/2015	[PR] [preparation and drafting] draft compl set of JI's forms and specials	6.9	6.9
2/3/2015	[PR] [preparation and drafting] rvw/edit pltfs prop jury inst.	3.4	3.4
2/3/2015	[RV] [review materials] rvw pltfs msj exbts	5.2	5.2
2/2/2015	[CN] [conference] conference with MT re: jury instructions	0.3	0.3
2/2/2015	[RV] [review materials] rvw MO jury i's	1.8	1.8
1/29/2015	[RS] [research] review and pull 9th C form Jury I's	2.7	2.7
1/29/2015	[RV] [review materials] rvw form JI's	2.3	2.3
1/27/2015	[CN] [conference] meeting with co-counsel about deadlines re: jury instruction, experts, and settlement issues	0.7	0.7
1/27/2015	[RS] [research] rsch leap re expert possib	2.1	2.1
1/26/2015	[RV] [review materials] rvw list of case dates from MO, compare to mine	1.6	1.6
1/23/2015	[RV] [review materials] rvw lttr to TK re class member status and case	0.3	0.3
1/14/2015	[RV] [review materials] rvw materials re mot 3rd am. compl	3.7	3.7
1/13/2015	[RV] [review materials] rvw materials re mot 3rd am. compl	2.9	2.9

1/12/2015	[RV] [review materials] rvw materials re mot 3rd am. compl	2.5	2.5
1/9/2015	[PR] [preparation and drafting] rvw /edit case schedule, milestones and upcoming tasks	3.4	3.4
1/9/2015	[RV] [review materials] amended scheduling order	0.3	0.3
1/7/2015	[ ] asses case strengths and weaknesses	2.8	2.8
12/19/2014	[RV] [review materials] conf cites in latest version of mo amend compl	0.8	0.8
12/18/2014	[RV] [review materials] rvw eml MO re cont violation	0.7	0.7
12/18/2014	[PR] [preparation and drafting] rvw AC edits re 3AC, pitch edits	0.3	0.3
12/18/2014	[PR] [preparation and drafting] draft 3AC edits	1.3	1.3
12/18/2014	[PR] [preparation and drafting] edits to 3rd am compl	0.6	0.6
12/17/2014	[RV] [review materials] rvw panuco eml re courts order re 2AC	0.4	0.4
12/15/2014	[RV] [review materials] rvw 2AC re gilbert points	0.8	0.8
12/14/2014	[PR] [preparation and drafting] draft partial mo amend compl	1.6	1.6
12/14/2014	[PR] [preparation and drafting] draft mo amend compl	1.1	1.1
12/13/2014	[PR] [preparation and drafting] edit dec re amended compl	1.1	1.1
12/13/2014	[PR] [preparation and drafting] edit decl re mo amend compl	1.6	1.6
12/13/2014	[PR] [preparation and drafting] draft decl re mo amend compl	2.3	2.3
12/11/2014	[RV] [review materials] rvw / circulate corresp re tort claims and denials	3.8	3.8
12/11/2014	[PN] [phone conference] call w AR re tort claim timeliness	0.7	0.7
11/29/2014	[CN] [conference] conf at HS re case strategy	2.3	2.3
11/26/2014	[PR] [preparation and drafting] eml HS re inherent coercion	0.2	0.2

11/26/2014	[RV] [review materials] rvw panuco redlines re City MSJ reply	1.2	1.2
11/26/2014	[PR] [preparation and drafting] eml HS re coercion plus	0.6	0.6
11/25/2014	[PR] [preparation and drafting] rvw /edit reply re City MSJ	2.3	2.3
11/19/2014	[RV] [review materials] rvw MO Art. 1, Sec. 7 / Sec. 13 argument	1.8	1.8
11/6/2014	[PN] [phone conference] call with MT re: edits to Nadir Opp statement of facts	0.4	0.4
11/6/2014	[PR] [preparation and drafting] eml MO re cazarez facts	0.3	0.3
11/6/2014	[PR] [preparation and drafting] rvw / edits to Nadir MSJ opp	1.1	1.1
11/6/2014	[PR] [preparation and drafting] AR re briefing from chris appeal in LASC	0.4	0.4
11/6/2014	[RV] [review materials] rvw / edits to City MSJ opp	3.5	3.5
11/5/2014	[RV] [review materials] rvw / edits to City MSJ opp	3.8	3.8
11/3/2014	[PN] [phone conference] call with AR, AC, DS, AH, CP, and MT to discuss the MSJ	0.3	0.3
11/2/2014	[PN] [phone conference] call with AR, AH, AC, MT, DS, and CP re: MSJ and class decertification	0.6	0.6
10/31/2014	[PN] [phone conference] call with AR and AC to discuss strategy	0.9	0.9
10/30/2014	[RV] [review materials] eml CP re discov and decs	0.2	0.2
10/30/2014	[RV] [review materials] eml CP re freedom of assoc	0.2	0.2
10/30/2014	[RV] [review materials] rvw opp decert	2.3	2.3
10/30/2014	[CN] [conference] City MSJ review - 52.1, meet w/ don cook re venegas	1.1	1.1
10/30/2014	[RS] [research] City MSJ review - 52.1	2.6	2.6
10/29/2014	[CN] [conference] meeting with AC, CP, DS, MT, AH, and AR re: pending motions	1.1	1.1
10/29/2014	[PR] [preparation and drafting] eml AC re association provsn	0.9	0.9

10/29/2014	[RV] [review materials] rvw nadir depo cites	1.4	1.4
10/29/2014	[PR] [preparation and drafting] eml AC re genuine belief in seasure	1.3	1.3
10/29/2014	[RS] [research] City MSJ review - injury/harm	3.1	3.1
10/28/2014	[RS] [research] City MSJ review - due process	2.2	2.2
10/27/2014	[RV] [review materials] City MSJ review	2.9	2.9
10/26/2014	[RV] [review materials] rvw pltfs msj exbts	2.1	2.1
10/26/2014	[PR] [preparation and drafting] nadir depo points	2.3	2.3
10/25/2014	[RV] [review materials] rvw pltfs msj exbts	3.3	3.3
10/25/2014	[RV] [review materials] rvw pltfs msj exbts	0.9	0.9
10/24/2014	[RV] [review materials] rvw MSJ final version	3.3	3.3
10/24/2014	[RV] [review materials] rvw pltfs msj exbts	1.7	1.7
10/23/2014	[RV] [review materials] rvw MSJ sep stat	1.9	1.9
10/23/2014	[PR] [preparation and drafting] MSJ Decl re notice	0.8	0.8
10/23/2014	[PR] [preparation and drafting] MSJ rvw and edits	2.6	2.6
10/23/2014	[PR] [preparation and drafting] eml re insert Mendocino analysis re MSJ	0.6	0.6
10/23/2014	[PR] [preparation and drafting] pltf MSJ revw and edits	3.2	3.2
10/22/2014	[PR] [preparation and drafting] MSJ rvw and edits	4.3	4.3
10/22/2014	[RV] [review materials] eml panuco re outlier curfew analysis	0.3	0.3
10/22/2014	[RV] [review materials] eml MT re outlier curfew analysis	0.8	0.8
10/22/2014	[RV] [review materials] eml AR re naked 1st Am argument	0.4	0.4
10/22/2014	[RS] [research] pull colonia sections re all for crime curfew	1.3	1.3
10/19/2014	[PN] [phone conference] call with CP, MT, AH and AR re: MSJ	0.9	0.9

10/19/2014	[RV] [review materials] 1st am research and edits	2.7	2.7
10/19/2014	[CN] [conference] rev depo t-script / corrections	3.6	3.6
10/18/2014	[PN] [phone conference] call with AR, CP, MT, AH re: Rodriguez MSJ	0.9	0.9
10/18/2014	[RV] [review materials] rev chris depo t-script	3.1	3.1
10/17/2014	[CN] [conference] meeting with AR and DS re preparation	0.4	0.4
10/17/2014	[CN] [conference] conference with MT, AR and CP re: MSJ and motion to decertify	1.2	1.2
10/16/2014	[NC] [other non-court] Chris R depo cont	3.1	3.1
10/14/2014	[CN] [conference] conference with MT, AR and support staff re: workflow for MSJ and oppositions	1.2	1.2
10/13/2014	[CN] [conference] conference with CP, DS, and AR re: Rodriguez and upcoming deadlines, MSJ, discovery	1.1	1.1
10/12/2014	[RV] [review materials] rvw gomez depo	2.2	2.2
10/11/2014	[RV] [review materials] rvw gomez depo	4.6	4.6
10/8/2014	[PR] [preparation and drafting] eml rena re seal portions	0.3	0.3
10/8/2014	[RV] [review materials] rvw rough of chris depo for seal portions	4.6	4.6
10/7/2014	[RV] [review materials] stip re LA T extnsn	0.2	0.2
10/7/2014	[RV] [review materials] mssg gang line urgnt re class member	0.2	0.2
10/6/2014	[CN] [conference] conference with AR, CP, and MT re: discovery matters	1.1	1.1
10/5/2014	[RV] [review materials] emls re beck / trutnch w AR and panuco	0.3	0.3
10/2/2014	[CN] [conference] conference with CP, DS and AR re: various filings and outstanding discovery issues, dividing up tasks amongst co-counsel and depo prep	0.9	0.9
10/1/2014	[RV] [review materials] eml lil re prot order re chris depo	0.9	0.9
10/1/2014	[RV] [review materials] eml rena re prot order re depo	1.3	1.3

10/1/2014	[PR] [preparation and drafting] emls re drafts re prot order re chris depo	0.8	0.8
10/1/2014	[PR] [preparation and drafting] eml dfs re depo prot order / ex parte	1.8	1.8
10/1/2014	[RV] [review materials] chris depo xbts review	1.3	1.3
10/1/2014	[RS] [research] rsch re prot depo order re safety	3.4	3.4
9/30/2014	[CN] [conference] conference with MT, AR, CP, and DS re ex parte re Chris deposition and about stipulations to contue trial date and MSJ deadline	0.7	0.7
9/30/2014	[RS] [research] rsch re prot depo order re safety	2.5	2.5
9/30/2014	[RV] [review materials] chris depo audio review	1.9	1.9
9/30/2014	[RV] [review materials] chris depo audio review	6.6	6.6
9/29/2014	[NC] [other non-court] depo chris	9.1	9.1
9/29/2014	[NC] [other non-court] Chris R depo	9.2	9.2
9/28/2014	[RV] [review materials] chris depo prep	3.2	3.2
9/28/2014	[RV] [review materials] chris depo prep	5.7	5.7
9/28/2014	[PR] [preparation and drafting] CR resps LA DEPO RFP	1.2	1.2
9/28/2014	[PR] [preparation and drafting] CR resps Nadir DEPO RFP	3.9	3.9
9/27/2014	[RV] [review materials] chris depo prep	5.4	5.4
9/26/2014	[PR] [preparation and drafting] Ex Parte App sub Alberto estate / dec / exhibits / order	3.2	3.2
9/25/2014	[RV] [review materials] chris depo prep	3.6	3.6
9/25/2014	[RV] [review materials] eml w panuco re rena production	0.2	0.2
9/25/2014	[RV] [review materials] eml w AR re chris depo prep	0.2	0.2
9/24/2014	[NC] [other non-court] chris depo prep	4.2	4.2
9/22/2014	[NC] [other non-court] chris depo prep	3.1	3.1
9/20/2014	[PR] [preparation and drafting] Prob Ct. fee waiver	0.6	0.6

9/19/2014	[PR] [preparation and drafting] eml re depo re nadir	0.1	0.1
9/18/2014	[RV] [review materials] rev nadir depo audio	3.7	3.7
9/17/2014	[CN] [conference] con with AR re Nadir deposition and questions	0.5	0.5
9/16/2014	[CN] [conference] conferences with CP re: deposition of Nadir and additional questions to ask	2.2	2.2
9/16/2014	[NC] [other non-court] nadir depo	5.1	5.1
9/15/2014	[PR] [preparation and drafting] Nadir depo outline	2.7	2.7
9/14/2014	[RV] [review materials] Nadir depo prep	3.9	3.9
9/13/2014	[RV] [review materials] Nadir depo prep	6.2	6.2
9/12/2014	[RV] [review materials] eml re tremblay exbts	0.2	0.2
9/12/2014	[RV] [review materials] rvw city atty GI guidelines	1.4	1.4
9/8/2014	[CN] [conference] conference with all counsel re: discovery matters	0.4	0.4
9/4/2014	[PR] [preparation and drafting] asses case strengths and weaknesses	2.2	2.2
9/3/2014	[PN] [phone conference] Alberto mom re case	0.1	0.1
8/20/2014	[PN] [phone conference] call with MT and AR re: meet and confer, discovery, deposition dates, and the administrator of estate	1.1	1.1
8/19/2014	[RV] [review materials] CSI pros article re tremblay	1.3	1.3
8/15/2014	[CN] [conference] conference with DS	0.5	0.5
8/15/2014	[PR] [preparation and drafting] emls re chris' depo and extent of q's	0.8	0.8
8/13/2014	[RV] [review materials] eml re dates of service from MT	0.3	0.3
8/12/2014	[CN] [conference] conference call with CP and DS re: discovery	2.5	2.5
8/8/2014	[RS] [research] rsch re disc immun v. mand duty	4.4	4.4
8/8/2014	[RS] [research] rsch re disc immun v. mand duty	3.7	3.7

8/6/2014	[RV] [review materials] eml re chris homework	0.8	0.8
8/1/2014	[RV] [review materials] rvw AC vindictive pros motion	1.8	1.8
7/29/2014	[PN] [phone conference] call with CP re: estate issues of Alberto	0.5	0.5
7/25/2014	[CN] [conference] conference with AR re: depositions and preparation	1.1	1.1
7/22/2014	[RV] [review materials] rvw SB injunction decision	2.2	2.2
7/18/2014	[RV] [review materials] rvw alberto papers and communications	3.2	3.2
7/17/2014	[CN] [conference] meeting with DS, MT, CP, and AR	1.6	1.6
7/15/2014	[CN] [conference] conference with AR, CP and DS re: discovery and Estate	1.2	1.2
7/11/2014	[CN] [conference] conference with co-counsel and opp counsel and clerk re: setting MSJ date	0.2	0.2
7/10/2014	[CN] [conference] conference with AR, clerk re: continuing MSJ date	0.5	0.5
7/10/2014	[RS] [research] CXC internet searches	2.7	2.7
7/10/2014	[RV] [review materials] CXC video	0.6	0.6
7/9/2014	[RS] [research] AR memo / cases re pros immunity	2.4	2.4
7/8/2014	[CN] [conference] conference with AR re: preparation for meet and confer with opp counsel	0.5	0.5
7/3/2014	[CN] [conference] discussions with AR re: discovery, depositions	0.9	0.9
6/29/2014	[PN] [phone conference] call w GH re inj curfew case status in LA re SB inj	1.7	1.7
6/27/2014	[CN] [conference] conference with AR, judges clerk and opp counsel re: dates for MSJ and briefing schedule	2.2	2.2
6/26/2014	[CN] [conference] conference with AR re: preparations for depositions, discovery requests, motion for summary judgment	0.5	0.5
6/25/2014	[CN] [conference] conference with AR re: preparing for depositions, discovery to be sent out	0.4	0.4
6/20/2014	[CN] [conference] conference with AR re: depositions, subpoenas, and meeting and conferring on MSJs	0.5	0.5

6/18/2014	[RV] [review materials] AC lttrs re removal petition	2.4	2.4
6/10/2014	[PN] [phone conference] call with AR re: MSJ argument	0.5	0.5
6/3/2014	[PR] [preparation and drafting] compile materials for LA PubDef gang inj curfew approach on PX	1.3	1.3
6/3/2014	[PN] [phone conference] call w NF re LA PubDef gang inj curfew approach	1.8	1.8
5/21/2014	[PR] [preparation and drafting] asses case strengths and weaknesses	1.6	1.6
5/8/2014	[RV] [review materials] review of cty atty letter and related provisions re non-enforcement	2.1	2.1
4/30/2014	[CN] [conference] IAD intvw and follow-up re LAPD detention of chris	0.9	0.9
4/11/2014	[PN] [phone conference] call GH re gang-inj in SB evidence and similarities	2.6	2.6
4/4/2014	[CN] [conference] meeting with CP, AR, MT, DS re: MSJ and strategy going forward	2.1	2.1
4/4/2014	[RV] [review materials] rvw rdctd exemplars for LA T	1.7	1.7
4/4/2014	[RV] [review materials] rvw MT memo re 52.1	2.2	2.2
3/30/2014	[PN] [phone conference] call with AR re: review memo, cases on damages	1.2	1.2
3/11/2014	[RV] [review materials] rvw APRI Gang Prosecution Handbook	2.7	2.7
3/10/2014	[RV] [review materials] rvw APRI Gang Prosecution Handbook	3.1	3.1
3/6/2014	[NC] [other non-court] gang inj curfew presentation University High School	2.1	2.1
2/21/2014	[RV] [review materials] rvw scheduling order post appeal	0.9	0.9
2/11/2014	[CN] [conference] conference AR and Peter B. re: gang injunction cases	2.1	2.1
2/6/2014	[CN] [conference] conference with AR re: final status report	0.5	0.5
2/5/2014	[CN] [conference] conference with AR re: final draft of joint report	0.5	0.5

2/4/2014	[PR] [preparation and drafting] amended notice rltd case - Segura	3.1	3.1
2/2/2014	[PR] [preparation and drafting] asses case strengths and weaknesses	2.1	2.1
1/30/2014	[CN] [conference] conference with AR, CP, and DS re: new dates for trial, pretrial	1.1	1.1
1/28/2014	[CN] [conference] conference with AR re: scheduling new dates	0.4	0.4
1/28/2014	[PR] [preparation and drafting] emls re meeting to discuss new scheduling order proposal	0.6	0.6
1/27/2014	[RV] [review materials] rvw updated status rept due to ct order	0.5	0.5
1/27/2014	[RV] [review materials] eml w rochelle re 9th C stay while exemplar / redaction issue resolved	0.4	0.4
1/22/2014	[RV] [review materials] emls re exemplars / redaction	0.7	0.7
1/21/2014	[PR] [preparation and drafting] eml w rochelle and rena re LA T exemplars	0.4	0.4
1/21/2014	[RV] [review materials] rvw injunction records for exemplars for LA T disclosure	2.4	2.4
1/20/2014	[RV] [review materials] rvw injunction records for exemplars for LA T disclosure	2.7	2.7
1/20/2014	[RV] [review materials] rvw injunction records for exemplars for LA T disclosure	5.1	5.1
1/15/2014	[PR] [preparation and drafting] eml w HS re meeting re case status	0.2	0.2
1/15/2014	[RV] [review materials] rvw denial re removal CR and AC from gang inj	0.3	0.3
1/11/2014	[RS] [research] Review Rios and Elizalde re gang expert testimony and criminality of gang membership	5.2	5.2
1/2/2014	[PN] [phone conference] call with Tami Galindo re: fax	0.1	0.1
1/1/2014	[PR] [preparation and drafting] demand for GI removal C & A	0.4	0.4
1/1/2014	[PR] [preparation and drafting] compl. alikhan re 12/7 detention	0.1	0.1

1/1/2014	[PR] [preparation and drafting] compl. paysinger re 12/7 detention	2.3	2.3
9/9/2013	[PR] [preparation and drafting] MSJ notice	0.8	0.8
9/13/2013	[CN] [conference] chris about michele	2.6	2.6
12/20/2013	[CN] [conference] conference with AR re: finalize brief	0.5	0.5
12/20/2013	[RS] [research] rvw Rodriguez decision re gang prohibition scienter	3.1	3.1
12/19/2013	[CN] [conference] conference with AR and DS re: mootness	0.5	0.5
12/18/2013	[CN] [conference] conference with AR and DS re: mootness and briefing issue	0.5	0.5
12/17/2013	[CN] [conference] conference with AR and DS re: status of settlement and preparation letter to City Attorneys Office	1.5	1.5
12/14/2013	[CN] [conference] conf w chris re gang unit detention and review video	2.3	2.3
12/11/2013	[PN] [phone conference] call w chris re detention by gang unit	1.9	1.9
12/11/2013	[RV] [review materials] rvw eml re LA T exemplars	0.2	0.2
12/10/2013	[PN] [phone conference] call w AR re G-I rmvl letter and appeal impacts	0.6	0.6
12/10/2013	[PR] [preparation and drafting] draft G-I rmvl letter	1.8	1.8
12/10/2013	[RV] [review materials] eml re LA T exemplars	0.4	0.4
12/9/2013	[PN] [phone conference PR] [p] call w IDCA panelists re Vasquez and GI curfew	1.6	1.6
12/7/2013	[PR] [preparation and drafting] eml w IDCA panelists re Vasquez and GI curfew	1.1	1.1
12/6/2013	[PN] [phone conference] call with AR re: response by City Attorney	0.5	0.5
12/5/2013	[PR] [preparation and drafting] eml w AR re ACLU	0.3	0.3
12/5/2013	[RS] [research] rsch re ogden / vasquez approach comparison	0.8	0.8
11/13/2013	[CN] [conference] talk w chris re removal from gang inj	1.9	1.9

11/13/2013	[PR] [preparation and drafting] eml HS re removal of CR and AC from gang inj	0.8	0.8
11/12/2013	[CN] [conference] conference with City Attorney Feuer, Brenet, Tremblay, Shehandeh, CP, AR, and DS re: settlement	1.2	1.2
11/12/2013	[PR] [preparation and drafting] eml AR re survival of claims post-removal of class rep	0.7	0.7
11/12/2013	[RS] [research] rsch re waiver of claims via rmvl of class rep	0.7	0.7
11/11/2013	[CN] [conference] prep and meeting with Mike Feuer at LA City Attorneys Office with CP, DS, AR	4.3	4.3
11/11/2013	[RS] [research] rsch re waiver of claims via rmvl of class rep	1.9	1.9
11/11/2013	[RS] [research] rsch pros immunity re KRL I and II	2.3	2.3
11/11/2013	[RS] [research] rsch nadir prosecutorial immunity	4.1	4.1
11/10/2013	[PN] [phone conference] call w alberto re removal from gang inj , potential consequences	1.6	1.6
11/10/2013	[RS] [research] rsch re waiver of claims via rmvl of class rep	3.1	3.1
11/10/2013	[RS] [research] eml DS re indiv claims	0.7	0.7
11/10/2013	[PR] [preparation and drafting] eml AR re indiv claims	0.8	0.8
11/10/2013	[RV] [review materials] rvw indiv claims re question from AR	2.3	2.3
11/7/2013	[CN] [conference] conference with AR, CP, and DS re: possible mediation	0.5	0.5
11/7/2013	[RS] [research] rsch re vagueness and gang prohib	4.6	4.6
11/7/2013	[RS] [research] rvw Parker re gang prohib and vagueness	2.9	2.9
11/7/2013	[RV] [review materials] rvw CP eml to shawn	0.2	0.2
11/6/2013	[CN] [conference] conference with AR, CP, and DS re: settlement discussions	0.5	0.5
11/6/2013	[PR] [preparation and drafting] asses case strengths and weaknesses	2.2	2.2

11/6/2013	[PR] [preparation and drafting] eml w/ cites from Vasquez re fundmntl rights	2.4	2.4
11/6/2013	[PR] [preparation and drafting] eml w ICDA clarify vasquez re due process	1.2	1.2
11/5/2013	[CN] [conference] conference with AR, DS and Peter re: Vasquez opinion	0.4	0.4
11/5/2013	[PR] [preparation and drafting] eml HS re new subclass based upon Vasquez	0.3	0.3
11/5/2013	[RV] [review materials] rvw eml panuco re depo prep AC and CR	0.4	0.4
11/5/2013	[PR] [preparation and drafting] eml Vasquez to ICDA and LA Pub Def	0.2	0.2
11/5/2013	[RV] [review materials] rvw vasquez opinion 9th C	1.7	1.7
11/5/2013	[RV] [review materials] rvw vasquez opinion 9th C	4.2	4.2
10/31/2013	[RV] [review materials] rvw icda CALGANG info	1.2	1.2
10/30/2013	[PR] [review materials] order re C-LA prot order	1.6	1.6
10/28/2013	[CN] [conference] conference with CP re: status of all depositions	0.5	0.5
10/21/2013	[CN] [conference] conference with CP, AR, and DS re: depositions	0.5	0.5
10/21/2013	[PR] [preparation and drafting] eml w g hrndz re gang inj forum	0.8	0.8
10/21/2013	[RV] [review materials] eml re class member w question about prison	0.7	0.7
10/16/2013	[CN] [conference] conference with AR, DS, and CP re: scheduling upcoming depositions	1.1	1.1
10/14/2013	[CN] [conference] conference with AR, DS, and CP re: discovery, opp to motion for protective order, dates for depositions	0.5	0.5
10/11/2013	[CN] [conference] conference with CP and AR re removing Alberto and Chris from injunctions and effect of standing vis a vis Riverside v. McLaughlin case / depo dates disc status	0.9	0.9
10/11/2013	[PR] [preparation and drafting] eml plowden re defr to panuco	0.2	0.2

10/11/2013	[PR] [preparation and drafting] tremblay depo subp	0.5	0.5
10/10/2013	[PN] [phone conference] call with AR, CP, and DS re: deposition ,discovery	0.5	0.5
10/10/2013	[RV] [review materials] rvw eml re depo chief	0.4	0.4
10/9/2013	[PR] [preparation and drafting] eml panuco re depo chief -- subP	0.2	0.2
10/9/2013	[RV] [review materials] rvw eml re depo chief	0.3	0.3
10/9/2013	[RV] [review materials] rvw eml re depo chief	0.3	0.3
10/8/2013	[RV] [review materials] rvw eml re depo chief	0.4	0.4
10/5/2013	[PR] [preparation and drafting] eml stormer re nadir	0.2	0.2
10/5/2013	[RS] [research] rsch re nadir	3.3	3.3
10/3/2013	[PR] [preparation and drafting] Tremblay depo notice	0.5	0.5
9/26/2013	[PN] [phone conference] call with Tami Galindo re: deposition	0.1	0.1
9/24/2013	[CN] [conference] conference with ALL co-counsel re case status	0.5	0.5
9/24/2013	[PN] [phone conference] call w AC re sb 458 gang inj ntc, impact on case	1.8	1.8
9/20/2013	[PN] [phone conference] call with AR and CP re: discovery, protective order	0.4	0.4
9/20/2013	[CN] [conference] chris and michele about case	2.1	2.1
9/16/2013	[PR] [preparation and drafting] eml panuco re bifrctn	0.2	0.2
9/14/2013	[PR] [preparation and drafting] rvw dailynews gang inj story and make correction	0.7	0.7
9/14/2013	[RV] [review materials] Review b-charles article re gang injunctions (GI)	1.2	1.2
9/13/2013	[PN] [phone conference] call with CP re: dates available for trial	0.2	0.2
9/13/2013	[PN] [phone conference] call w b chrls re gang injunction story	1.8	1.8
9/13/2013	[PR] [review materials] Letter from Rena re MSJ M&C	0.3	0.3

9/11/2013	[CN] [conference] conference with AR, DS, and CP re: depositions, dates of trial, and MSJ	0.5	0.5
9/6/2013	[PR] [preparation and drafting] eml DS re MSJ notice	0.6	0.6
9/6/2013	[PN] [phone conference] alan and chris about case	0.8	0.8
9/5/2013	[PN] [phone conference] chris about alan	1.4	1.4
9/3/2013	[CN] [conference] discss GI case w/ brian charles - reprtr	3.4	3.4
9/3/2013	[PN] [phone conference] Alan and Alberto mom about case	0.4	0.4
9/2/2013	[RS] [research] rsch re Bane Act damages	3.9	3.9
9/2/2013	[RS] [research] rsch re Bane Act damages	1.6	1.6
9/2/2013	[RS] [research] rsch re Bane Act damages	3.8	3.8
9/2/2013	[PN] [phone conference] chris about case	2.3	2.3
9/2/2013	[PN] [phone conference] Chris and Alberto mom About the case	0.4	0.4
8/31/2013	[PR] [preparation and drafting] notice of suppl auth re courts question at prelim inj hearing	3.6	3.6
8/30/2013	[CN] [conference] conference with AR, CP, and DS re: discovery, oral argument	0.5	0.5
8/29/2013	[PN] [phone conference] alberto mom re case	0.4	0.4
8/27/2013	[RS] [research] rsch re 52.1 damages for notice of suppl auth re courts question at prelim inj hearing	6.1	6.1
8/26/2013	[PN] [phone conference] call w dpty DA re curfew non-enforcement	2.1	2.1
8/26/2013	[PR] [preparation and drafting] prep packet for dpty DA re LAPD curfew non-enforcement	1.7	1.7
8/26/2013	[RS] [research] rsch re 52.1 damages for notice of suppl auth re courts question at prelim inj hearing	15.8	15.8
8/22/2013	[RS] [research] rsch re Bane Act damages	4.6	4.6
8/16/2013	[CN] [conference] conference with AR and DS re: injunctions class	0.5	0.5

8/16/2013	[PN] [phone conference] conf w/ schreiber re stip and order re calgang	0.2	0.2
8/16/2013	[PR] [preparation and drafting] rev prop prot order re calgang	1.9	1.9
8/16/2013	[PN] [phone conference RS] [res] re eviction rules pub housing	0.7	0.7
8/16/2013	[RS] [research] rsch eviction guidelines	1.2	1.2
8/15/2013	[RS] [research] rsch re mootness re inj relf	3.3	3.3
8/15/2013	[RV] [review materials] rvw article re col chiques	0.8	0.8
8/15/2013	[PR] [preparation and drafting] prep docs re running gang inj series	3.2	3.2
8/15/2013	[PR] [preparation and drafting] assemble non-priv docs for b-charles	1.6	1.6
8/15/2013	[RS] [research] review colonia chiques	2.4	2.4
8/15/2013	[PN] [phone conference] re curfew arrest then pic posted in probation office then shot at	2.2	2.2
8/15/2013	[PN] [phone conference] conf re evictions based on curfew arrests	1.7	1.7
8/14/2013	[CN] [conference] conf w chris and alberto re getting off gang inj	2.6	2.6
8/14/2013	[CN] [conference] discss GI and class suit w/ brian charles - reprtr	2.3	2.3
8/7/2013	[PR] [preparation and drafting] exchng non-conf materials re CALGANG	2.9	2.9
8/5/2013	[PN] [phone conference] intl conv w ceballos re pron dept photo post resulting in shooting based upon gang inj curfew violation	2.1	2.1
8/5/2013	[PR] [preparation and drafting] eml w b charles re follow up intvws	0.3	0.3
7/29/2013	[PR] [preparation and drafting] rev prop prot order re calgang	1.4	1.4
7/29/2013	[PR] [preparation and drafting] prop prot order re calgang	1.9	1.9
7/23/2013	[CN] [conference] meetings with AR, CP, and reporter re: gang injunctions case	1.6	1.6

7/23/2013	[PN] [phone conference] intvw w b charles re gang injunction case	2.7	2.7
7/23/2013	[RV] [review materials] rvw letter re echo park inj	0.3	0.3
7/23/2013	[PR] [preparation and drafting] stip re state calgang disclosures	2.4	2.4
7/21/2013	[PN] [phone conference] EP at Catholic charities re potential class members	0.7	0.7
7/17/2013	[PN] [phone conference] call w b charles re gang inj case	2.3	2.3
7/15/2013	[PN] [phone conference] Chris re Alberto death	1.1	1.1
7/14/2013	[PN] [phone conference] Chris re Alberto death	1.9	1.9
7/14/2013	[CN] [conference] Chris re Alberto death	2.6	2.6
7/13/2013	[PR] [preparation and drafting] eml a alonzo re intvw on streetgangs.com	0.2	0.2
7/13/2013	[PN] [phone conference] Chris re Alberto death	3.1	3.1
7/13/2013	[PN] [phone conference] Chris re Alberto death	0.7	0.7
7/12/2013	[RV] [review materials] rvw streetgangs.com intvw	0.6	0.6
7/11/2013	[PR] [preparation and drafting] asses case strengths and weaknesses	1.7	1.7
7/7/2013	[RV] [review materials] rvw AC eml re echo park inj	0.3	0.3
7/7/2013	[PN] [phone conference] call w AC re echo park inj and case status	1.2	1.2
7/2/2013	[MO] [court hearing] hearing re CALGANG sub_p	1.1	1.1
7/2/2013	[PR] [preparation and drafting] prelim sch for LA T exemplars	1.9	1.9
7/1/2013	[PR] [preparation and drafting] hearing prep re CALGANG d-base subpoena	2.9	2.9
7/1/2013	[RS] [research] rvw Nunez re gang particip v enhancement	2.7	2.7
7/1/2013	[CN] [conference] intvw w a. alonzo re case and implications	1.4	1.4

6/30/2013	[PR] [preparation and drafting] hearing prep re CALGANG database sub-p	3.7	3.7
6/29/2013	[PR] [preparation and drafting] eml A Alonzo re case intvw	0.7	0.7
6/29/2013	[RV] [review materials] rvw & analyze echo park injunction	3.9	3.9
6/28/2013	[RS] [research] rsch hearing prep re subp service process, rejection, waiver, OSC	5.8	5.8
6/26/2013	[PR] [preparation and drafting] eml resp wilcox re exemplars for LA T	0.2	0.2
6/25/2013	[PR] [preparation and drafting] dec re LA dec re CA AG subp	2.2	2.2
6/21/2013	[RV] [review materials] AR SB 458 letter	0.3	0.3
6/21/2013	[RV] [review materials] rvw RS dec re calgang opp	0.6	0.6
6/21/2013	[RV] [review materials] LA dec re CA AG subp	1.4	1.4
6/20/2013	[RV] [review materials] review CA AG surreply	1.4	1.4
6/20/2013	[PR] [preparation and drafting] obj re surreply	0.6	0.6
6/20/2013	[RV] [review materials] CA AG surreply	1.3	1.3
6/18/2013	[PR] [preparation and drafting] reply re osc	2.8	2.8
6/13/2013	[RV] [review materials] CA AG opp re osc	2.2	2.2
6/12/2013	[PN] [phone conference] call with CP re: subpoena	0.3	0.3
6/12/2013	[RV] [review materials] rvw CA AG opp osc	2.3	2.3
6/12/2013	[RV] [review materials] rev decl CA AG re rej subp - rifkin	1.4	1.4
6/12/2013	[PR] [review materials] rev decl CA AG re rej subp - banuelos	0.8	0.8
6/6/2013	[CN] [phone conference] Return call from case line	0.3	0.3
6/2/2013	[NC] [other non-court] efile pltf opp MIL 3, 4, 5 snd SR dec	0.6	0.6
5/31/2013	[PR] [preparation and drafting] app osc re sub compl	3.4	3.4

5/29/2013	[CN] [conference] conference with AR re: Scheduling, discovery, trial and emails	0.5	0.5
5/28/2013	[PN] [phone conference] conference call with BR, CP, AR, and DS re finalize brief	0.5	0.5
5/28/2013	[RS] [research] rvw eml from panuco re objecting atty	0.3	0.3
5/27/2013	[RV] [review materials] rvw panuco bianca edits to 9th C brief	2.7	2.7
5/26/2013	[RS] [research] rsch re objectors	4.1	4.1
5/24/2013	[PN] [phone conference] call w wilcox re exmplars	1.2	1.2
5/24/2013	[PR] [preparation and drafting] eml joel re exemplars of police repts	0.3	0.3
5/23/2013	[RV] [review materials] rvw eml re LA T exemplars	0.6	0.6
5/23/2013	[RV] [review materials] rvw pdnet post re gangcase.com	0.6	0.6
5/22/2013	[RV] [review materials] rev answ brief 9th circ	2.8	2.8
5/22/2013	[RV] [review materials] rev answ brief 9th circ - fact/rec check	2.6	2.6
5/21/2013	[PN] [phone conference] call w client re priority question re lawsuit	0.3	0.3
5/21/2013	[RV] [review materials] rev answ brief 9th circ	4.1	4.1
5/16/2013	[PN] [phone conference] call w client re priority question re lawsuit	1.2	1.2
5/15/2013	[CN] [conference] conference with co-counsel re: disk from City	0.5	0.5
5/14/2013	[CN] [conference] conference with AR and CP re: phone calls	0.5	0.5
5/7/2013	[RV] [review materials] review Ulloa subm re service	0.3	0.3
5/7/2013	[PN] [phone conference] LA Pub Def re case strategy / assistance	2.3	2.3
5/7/2013	[PN] [phone conference] gang call in line case question from class member	0.3	0.3
5/7/2013	[PN] [phone conference] gang call in line case question from class member	0.7	0.7

5/7/2013	[PR] [preparation and drafting] CA AG confer lettr	1.1	1.1
5/2/2013	[RS] [research] trenholme engelbrecht analysis and gang inj strategy	4.5	4.5
4/30/2013	[NC] [other non-court] set up HS gang case lines 1 and 2	0.7	0.7
4/30/2013	[PN] [phone conference] gang call in line case question from class member	0.6	0.6
4/30/2013	[PN] [phone conference] gang call in line case question from class member	0.4	0.4
4/30/2013	[RS] [research] rsch law re defendant class cases	5.3	5.3
4/30/2013	[RV] [review materials] rvw webster dec re service	0.3	0.3
4/29/2013	[PN] [phone conference] gang call in line case question from class member	0.7	0.7
4/29/2013	[PN] [phone conference] gang call in line case question from class member	0.4	0.4
4/29/2013	[PN] [phone conference] gang call in line case question from class member	0.8	0.8
4/29/2013	[NC] [other non-court] remove panuco from gang line	0.4	0.4
4/27/2013	[PN] [phone conference] gang call in line case question from class member	0.6	0.6
4/27/2013	[PN] [phone conference] gang call in line case question from class member	0.7	0.7
4/26/2013	[PN] [phone conference] gang call in line case question from class member	0.8	0.8
4/26/2013	[PN] [phone conference] gang call in line case question from class member	0.6	0.6
4/26/2013	[PN] [phone conference] gang call in line case question	0.8	0.8
4/26/2013	[PN] [phone conference] gang call in line case question	1.1	1.1
4/26/2013	[PN] [phone conference] gang call in line case question	0.7	0.7
4/24/2013	[NC] [other non-court] line set-up and testing for gang call-in line	2.8	2.8

4/22/2013	[PR] [preparation and drafting] post revised spanish notice per panuco	1.3	1.3
4/19/2013	[PR] [preparation and drafting] edits to online ntc to remv signup button per rena	1.1	1.1
4/19/2013	[RV] [review materials] rvw 2nd am complaint	1.6	1.6
4/17/2013	[PR] [review materials] Review website pursuant to letter from Rena re website	2.9	2.9
4/17/2013	[PR] [review materials] Letter from Rena re website	0.5	0.5
4/12/2013	[CN] [conference] conference with AR re: notices	0.3	0.3
4/11/2013	[RV] [review materials] rvw order re jnt rept	0.3	0.3
4/9/2013	[PN] [phone conference] call w mcgill re further decs and specs	0.8	0.8
4/8/2013	[CN] [conference] conference with AR, CP, and DS re: Vasquez oral argument and implications for our case	0.6	0.6
4/8/2013	[MO] [court hearing] attnd vasquez argument 9th C	2.2	2.2
4/5/2013	[CN] [conference] conference with AR re: notices, joint report	0.4	0.4
4/5/2013	[PR] [preparation and drafting] eml rena re jnt rept and prop ntc re class cert	0.6	0.6
4/5/2013	[PN] [phone conference] LA Times - Gamino, re add cost	0.4	0.4
4/5/2013	[PR] [preparation and drafting] exhibit - LA times ad cost -- for jnt rpt	0.2	0.2
4/5/2013	[PR] [preparation and drafting] exhibit - ntc unenforceability -- for jnt rpt	0.4	0.4
4/5/2013	[PR] [preparation and drafting] exhibit - ntc prelim inj -- for jnt rpt	1.1	1.1
4/5/2013	[PR] [preparation and drafting] exhibit - ntc class cert -- for jnt rpt	2.1	2.1
4/5/2013	[PR] [preparation and drafting] jt rpt re pub / posting	1.5	1.5
4/5/2013	[PR] [preparation and drafting] notice of class action and prelim inj	0.7	0.7
4/4/2013	[CN] [conference] Conference with DS, CP, and AR re: class notice, preliminary injunction	0.9	0.9

4/4/2013	[PR] [preparation and drafting] drafts of ntc prelim inj	1.2	1.2
4/3/2013	[CN] [conference] conference with AR re meet and confer with city	0.3	0.3
4/2/2013	[CN] [conference] conference with CP and AR re: class cert notice and process of answering phone calls	0.3	0.3
3/8/2013	[RS] [research] calgang research - use	1.8	1.8
3/22/2013	[RV] [review materials] rev CA AG letter re reject svc subp	0.4	0.4
3/20/2013	[PN] [phone conference] call w cory and rochelle re exemplars	0.8	0.8
3/20/2013	[RS] [research] rvw Villa re source info necessary to support gang membership determination	2.3	2.3
3/19/2013	[PN] [phone conference] call w alberto re gang inj presentation	0.6	0.6
3/19/2013	[NC] [other non-court] serve subpoena	0.2	0.2
3/18/2013	[PR] [preparation and drafting] prep subpoena calgang info CA AG	1.4	1.4
3/15/2013	[RV] [review materials] eml from bruce re no agreement on jnt rept	0.3	0.3
3/15/2013	[PR] [preparation and drafting] eml bruce re pltfs joint rep position	0.9	0.9
3/15/2013	[RV] [review materials] rvw LA IG injunction audit	4.2	4.2
3/15/2013	[PR] [preparation and drafting] edit revise jnt resp to OSC re notice	3.2	3.2
3/14/2013	[PR] [preparation and drafting] eml re defs access to databases	0.7	0.7
3/14/2013	[RV] [review materials] rvw AR notes re defs position re svc	1.6	1.6
3/13/2013	[PR] [preparation and drafting] draft jnt rsp re OSC	2.8	2.8
3/13/2013	[RV] [review materials] GI svc docs # 11110-11191	2.1	2.1
3/12/2013	[PN] [phone conference] call w kpcc re lawsuit progress	0.7	0.7

3/12/2013	[RS] [research] rsch re SRA International / Orion	7.6	7.6
3/12/2013	[RS] [research] calgang research - use	2.1	2.1
3/11/2013	[RS] [research] calgang research - nodes	0.8	0.8
3/11/2013	[RS] [research] calgang research - nodes	2.4	2.4
3/10/2013	[RS] [research] calgang research - law	3.2	3.2
3/10/2013	[RS] [research] calgang research - law	4.1	4.1
3/9/2013	[RS] [research] rsch C.G.N.A.C.	3.9	3.9
3/9/2013	[RS] [research] rsch re CLETS	2.8	2.8
3/9/2013	[RS] [research] calgang research - structure	2.1	2.1
3/9/2013	[RS] [research] calgang research - structure	2.2	2.2
3/8/2013	[PR] [preparation and drafting] asses case strengths and weaknesses	1.8	1.8
3/8/2013	[RS] [research] calgang research - structure	1.8	1.8
3/6/2013	[RV] [review materials] rvw amended order re prelim inj	1.2	1.2
3/5/2013	[PN] [phone conference] call w kpcc re lawsuit and status	2.1	2.1
2/25/2013	[CN] [conference] conference with AR and CP re: joint status report	0.5	0.5
2/25/2013	[PR] [preparation and drafting] rvw and edits re notice of class cert	3.4	3.4
2/25/2013	[RV] [review materials] jt status rept re notice of unconst inj	1.3	1.3
2/22/2013	[PN] [phone conference] call with AR re order on motion to unseal	0.8	0.8
2/20/2013	[CN] [conference] conference with AR, CP, and DS re class notice and upcoming conference with opp counsel re class notice	1.2	1.2
2/19/2013	[RV] [review materials] rvw JEM order re LA-T intervene	0.7	0.7
2/19/2013	[NC] [other non-court] press conf prep and conf at LAPD HQ	1.7	1.7
2/19/2013	[RS] [research] pull press contacts / release release	2.4	2.4

2/19/2013	[RV] [review materials] rvw press release re prelim inj	0.1	0.1
2/18/2013	[PN] [phone conference] call with AR re: press conference and press release	0.4	0.4
2/18/2013	[PR] [preparation and drafting] press release re prelim inj edits	0.7	0.7
2/16/2013	[CN] [conference] meet w doc reviewers re class cert ruling	2.2	2.2
2/16/2013	[PR] [preparation and drafting] press release rewrite	1.9	1.9
2/16/2013	[PR] [preparation and drafting] press release re prelim inj	2.1	2.1
2/15/2013	[PN] [phone conference] call w alberto re case status	1.2	1.2
2/15/2013	[PN] [phone conference] call w chris re class cert ruling	1.4	1.4
2/15/2013	[RV] [review materials] rvw order re class cert	3.6	3.6
2/12/2013	[PN] [phone conference] call w cazarez re LA T order / status	1.6	1.6
2/8/2013	[PN] [phone conference] call with AR and DS re: clients	0.2	0.2
2/7/2013	[RV] [review materials] rvw order LA T get docs	0.6	0.6
2/7/2013	[RV] [review materials] rvw order re LAT mo unseal	1.1	1.1
1/22/2013	[PR] [preparation and drafting] alberto city rfp1 v2 resps	0.9	0.9
1/22/2013	[PR] [preparation and drafting] alberto city rfa1 v2 resps	1.1	1.1
1/22/2013	[PR] [preparation and drafting] alberto lapd rogs1 v2 resps	0.6	0.6
1/22/2013	[PR] [preparation and drafting] alberto city rogs1 v2 resps	0.7	0.7
1/22/2013	[PR] [preparation and drafting] chris city rogs1 v2 resps	2.6	2.6
1/22/2013	[PR] [preparation and drafting] chris lapd rogs1 v2 resps	2.7	2.7
1/21/2013	[PR] [preparation and drafting] chris city rfp1 v2 resps	2.9	2.9
1/20/2013	[PR] [preparation and drafting] chris city rfa1 v2 resps	3.7	3.7

1/18/2013	[PN] [phone conference] call with CP and AR re: supplemental response	0.6	0.6
1/18/2013	[PR] [preparation and drafting] let RS re amend disc resps	2.1	2.1
1/16/2013	[RS] [research] rvw Fernandez re support for determination of gang membership	2.3	2.3
1/14/2013	[PN] [phone conference] call w/ AR re: discovery responses	0.5	0.5
1/2/2013	[PN] [phone conference] call w/ cp and re: hearing, doc production	0.2	0.2
12/21/2012	[CN] [conference] discussion w/ co-counsel re case status	0.3	0.3
12/20/2012	[RS] [research] rsch liab only class cert / categorical damages	5.2	5.2
12/13/2012	[PN] [phone conference] call w trenholme re gang injunctions	1.4	1.4
12/11/2012	[RS] [research] rsch legislative power sep from courts	6.1	6.1
12/11/2012	[RV] [review materials] rvw inglewood inj	0.9	0.9
12/10/2012	[RV] [review materials] LA rule 37-1 letter / responses	4.2	4.2
11/27/2012	[RS] [research] rsch re inj mods, process	2.4	2.4
11/15/2012	[PN] [phone conference] call w/ MTR re: questionnaires and witness statements	0.5	0.5
11/6/2012	[RS] [research] rsch re work product / wit notes	1.2	1.2
11/6/2012	[RS] [research] rsch re waiver of priv if no log	0.8	0.8
11/6/2012	[RV] [review materials] rvw pltf initial prod	2.8	2.8
10/29/2012	[RV] [review materials] panuco eml re comm meetings / differences	0.7	0.7
10/29/2012	[PR] [preparation and drafting] review notes re case status and prepare brief rept eml to yjc rsch director	2.1	2.1
10/25/2012	[RS] [research] rvw Brandao re constitutionality of no gang contact prohibitions	2.3	2.3
10/24/2012	[CN] [conference] conf w/ CP, AR, and DS re: discovery responses	0.5	0.5

10/22/2012	[CN] [conference] conf w/ CP re: meeting with clients and discovery	0.6	0.6
10/20/2012	[RV] [review materials] eml panuco to CR and AC re proof of enrollment	0.2	0.2
10/15/2012	[CN] [conference] conf w/ DS, CP re: discovery responses and other matters	0.9	0.9
10/10/2012	[PR] [preparation and drafting] eml AR re file 2nd suit now	0.4	0.4
10/10/2012	[RV] [review materials] rvw chris own written version of recent detention re claim potential	0.8	0.8
9/20/2012	[PN] [phone conference] phone call with AR re: discovery, clients	0.4	0.4
9/18/2012	[RV] [review materials] bruce monroe sub out	0.1	0.1
9/7/2012	[RV] [review materials] rvw response to defs suppl decs	0.6	0.6
9/7/2012	[RV] [review materials] reply to defs decs re prelim inj	1.8	1.8
9/6/2012	[RV] [review materials] rvw chris decl re detention	0.8	0.8
9/6/2012	[PN] [phone conference] call w panuco re chris detention last night	0.7	0.7
9/4/2012	[PN] [phone conference] call from chris re detention by LAPD	2.2	2.2
8/31/2012	[NC] [other non-court] file ntc suppl auth re 52.1 damages if no actuals	0.3	0.3
8/31/2012	[PR] [preparation and drafting] memo re 52.1 damages if no actuals	2.6	2.6
8/31/2012	[RS] [research] rsch re 52.1 damages if no actuals	7.3	7.3
8/30/2012	[RS] [research] rsch re 52.1 damages if no actuals	5.9	5.9
8/30/2012	[RS] [research] pull/review sample class cert order - CRAFT	2.2	2.2
8/28/2012	[RV] [review materials] rvw YJC CALGANG rept	1.4	1.4
8/27/2012	[PR] [preparation and drafting] eml to comm orgs -- LAPD no more curfew arrests	0.2	0.2

8/27/2012	[PR] [preparation and drafting] eml to LA Pub Def -- LAPD no more curfew arrests	0.2	0.2
8/27/2012	[PR] [preparation and drafting] eml to LA T -- LAPD no more curfew arrests	0.2	0.2
8/27/2012	[ ] review LAPD ops order no 3	0.8	0.8
8/26/2012	[RV] [review materials] rvw Sale decl re service	0.4	0.4
8/24/2012	[MO] [court hearing] mo prelim inj argument, pre arg meeting and post arg meeting	2.1	2.1
8/23/2012	[PR] [preparation and drafting] refine prelim inj argument flow	4.8	4.8
8/22/2012	[PN] [phone conference] call w rena re disc continuance	0.3	0.3
8/22/2012	[PR] [preparation and drafting] refine prelim inj argument flow	4.2	4.2
8/21/2012	[RS] [research] rvw P.I. cases - focus Winter rule and public interest analysis	7.2	7.2
8/16/2012	[CN] [conference] conf w/ CP, AR re: previous conference call w/ City and LA Times	0.5	0.5
8/16/2012	[RV] [review materials] LA T position re status report re intervention	2.1	2.1
8/15/2012	[CN] [conference] conf w/ AR re: penalties/ damages	0.5	0.5
8/14/2012	[CN] [conference] conf w. CP re: dividing up discovery responses/ research	0.5	0.5
8/14/2012	[RV] [review materials] rvw cty ntc of MSJ	0.8	0.8
8/10/2012	[PR] [preparation and drafting] incorp panuco edits/issues in reply re prelim inj	3.1	3.1
8/10/2012	[PR] [preparation and drafting] finalize & file reply re prelim inj	1.7	1.7
8/10/2012	[RV] [review materials] rvw applt div order in chris crm case	2.3	2.3
8/9/2012	[PR] [preparation and drafting] edits reply re prelim inj	0.8	0.8
8/9/2012	[RV] [review materials] edits reply re prelim inj	1.6	1.6
8/9/2012	[PR] [preparation and drafting] notes re pltf rply re prelim inj	4.4	4.4

8/9/2012	[PR] [preparation and drafting] notes re pltf rply re prelim inj	2.3	2.3
8/9/2012	[RV] [review materials] rvw prob cause form	0.2	0.2
8/8/2012	[RS] [research] pltf rply re prelim inj	7.2	7.2
8/8/2012	[RV] [review materials] rvw 1538.5 hearing tscrpt	2.1	2.1
8/8/2012	[RS] [research] issue preclusion re crim ct. determinations	3.6	3.6
8/7/2012	[RS] [research] pltf rply re prelim inj	1.8	1.8
8/7/2012	[RS] [research] defs opp to prelim inj	2.2	2.2
8/4/2012	[RS] [research] defs opp to prelim inj	5.1	5.1
8/3/2012	[RS] [research] defs opp to prelim inj	3.8	3.8
8/3/2012	[RV] [review materials] defs opp to prelim inj	4.4	4.4
7/27/2012	[RV] [review materials] rvw lopez decl re service	0.3	0.3
7/23/2012	[CN] [conference] conf w/ DS, CP, and AR re non opposition to LA Times motion	0.4	0.4
7/20/2012	[RV] [review materials] rvw LA-T reply re mo unseal	2.6	2.6
7/20/2012	[RV] [review materials] rvw LA-T obj to defs decs	1.7	1.7
7/19/2012	[RV] [review materials] non-opp to LA-T unseal recs - CP edits	0.3	0.3
7/19/2012	[PR] [preparation and drafting] non-opp to LA-T unseal recs	0.8	0.8
7/13/2012	[RV] [review materials] double check defs production for Varrio Nuevo Estrada records	3.6	3.6
7/11/2012	[RV] [review materials] rvw gonzalez decl re sevice	0.4	0.4
7/6/2012	[ ] rvw mo prelim inj exhbts	5.2	5.2
7/6/2012	[RV] [review materials] rvw prop order re prelim inj	0.4	0.4
7/6/2012	[RV] [review materials] rvw chris FI card	0.3	0.3
7/6/2012	[PR] [preparation and drafting] rsch / draft notice re preliminary injunction	3.2	3.2

7/5/2012	[CN] [conference] conf w/ AR and CP re: motion for preliminary injunction	0.5	0.5
7/5/2012	[PR] [preparation and drafting] eml re exbts to prelim inj mo not under seal	0.7	0.7
7/4/2012	[CN] [conference] conf w DS re sig / argument on prelim inj motion	0.8	0.8
7/3/2012	[RV] [review materials] rvw latest panuco draft of mo prelim inj re DS comments	1.6	1.6
7/2/2012	[PR] [preparation and drafting] edits re latest panuco draft of mo prelim inj	1.7	1.7
7/1/2012	[PR] [preparation and drafting] edits mo prelim inj	1.4	1.4
6/28/2012	[PR] [preparation and drafting] draft meet confer letter re mo prelim inj	0.9	0.9
6/28/2012	[RV] [review materials] rvw mo prelim inj	2.2	2.2
6/26/2012	[RV] [review materials] rvw panuco edits to mo prelim inj	1.9	1.9
6/15/2012	[RS] [research] rvw Rangel re gang indicia	2.2	2.2
6/12/2012	[MO] [court hearing] settlemnt conf w JEM and pre-meeting w coulnsel	3.4	3.4
6/10/2012	[RV] [review materials] rvw sb296 re gang inj removal	0.9	0.9
6/4/2012	[PR] [preparation and drafting] revise settlement brief - JEM	0.9	0.9
6/3/2012	[PR] [preparation and drafting] settlement brf notes	1.4	1.4
6/3/2012	[ ] settlement brief - JEM	1.6	1.6
6/3/2012	[PR] [preparation and drafting] settlement brief - JEM	3.1	3.1
6/3/2012	[PR] [preparation and drafting] mediation statement	3.3	3.3
6/3/2012	[RS] [research] Damages, 52.1 showing - for mediation statement	5.6	5.6
6/1/2012	[MO] [court hearing] mo class cert and pre-meeting	1.4	1.4
6/1/2012	[PN] [phone conference] conf re city counter	0.4	0.4

6/1/2012	[PR] [preparation and drafting] let re city settlement counter	0.2	0.2
5/29/2012	[PR] [preparation and drafting] obj opp suppl mo strike	4.1	4.1
5/25/2012	[CN] [conference] meet at HS re damages	2.6	2.6
5/24/2012	[CN] [conference] conf w/ counsel re damages and demand	0.4	0.4
5/24/2012	[PR] [preparation and drafting] eml to HS re damages and meeting	3.2	3.2
5/18/2012	[PN] [phone conference] call w/ BR re filing reply	0.4	0.4
5/18/2012	[PR] [preparation and drafting] incl exbts for argmnt re indiv PC and sevice as infringment	2.1	2.1
5/18/2012	[RS] [research] pull People v. Rodriguez re detention/ID	0.8	0.8
5/18/2012	[RS] [research] rsch commonality, prop 8, ppl v. rdrgz	5.3	5.3
5/18/2012	[RS] [research] rsch srvc, ongoign inj, US v evans, Chi v. Morales, Piphus, murgia, oaks	6.7	6.7
5/18/2012	[RV] [review materials] rvw reply re class cert	1.8	1.8
5/18/2012	[PR] [preparation and drafting] suppl dec re class cert	2.2	2.2
5/17/2012	[CN] [conference] conf w/ DS and AR re: research and reply brief	0.5	0.5
5/17/2012	[RV] [review materials] check ayad bates nos re database	1.4	1.4
5/17/2012	[PR] [preparation and drafting] eml Dr. Leap at UCLA re CALGANG	0.3	0.3
5/17/2012	[RV] [review materials] rvw service records and arrest reports for note that offcr checked database to verify	2.6	2.6
5/17/2012	[RV] [review materials] rvw vasquez/fairbank file - standing, cert	2.1	2.1
5/16/2012	[CN] [conference] conf w/ AR re: class cert.	0.5	0.5
5/16/2012	[RV] [review materials] rvw service records and arrest reports for note that offcr checked database to verify	4.9	4.9
5/16/2012	[RV] [review materials] rvw service records and arrest reports for note that offcr checked database to verify	2.6	2.6

5/16/2012	[RV] [review materials] rvw vasquez/fairbank file - cert	3.1	3.1
5/15/2012	[CN] [conference] conf w/ AR and DS re: reply.	0.5	0.5
5/15/2012	[PR] [preparation and drafting] prep class cert argument points and hearsay except argument re use of summaries	5.8	5.8
5/15/2012	[RS] [research] rsch re status and legal effect of alberto's outstanding ct case for ticket	4.4	4.4
5/15/2012	[RV] [review materials] rvw vasquez/fairbank file - cert	2.4	2.4
5/14/2012	[RV] [review materials] notice of settlement conf - JEM	0.7	0.7
5/11/2012	[RV] [review materials] rvw vazquez decl re service	0.3	0.3
5/9/2012	[PN] [phone conference] phone call w/ AR re: scheduling order re: mediation	0.3	0.3
4/30/2012	[CN] [conference] conf w/ AR re: opposition to motion for class cert	0.4	0.4
4/30/2012	[PR] [preparation and drafting] notes re tasks on class cert mo – numbers, dec re outreach, LA-T removal info, Acuna	0.7	0.7
4/27/2012	[RV] [review materials] rvw def opp class cert & attchmnts	6.8	6.8
4/27/2012	[RV] [review materials] rvw def opp class cert mo jud ntc and exbts	2.7	2.7
4/27/2012	[RV] [review materials] rvw def opp class cert evid obj, tremblay dec	1.8	1.8
4/19/2012	[RV] [review materials] rvw carr dec re service	0.3	0.3
4/17/2012	[PN] [phone conference] call w/ AR re preliminary injunction	0.4	0.4
4/10/2012	[RV] [review materials] rvw addtl YJC decs re service	2.3	2.3
4/9/2012	[PR] [preparation and drafting] eml w McGill re addtl decs	0.6	0.6
3/30/2012	[PN] [phone conference] call w Norma Molina re filing deadline	0.1	0.1
3/30/2012	[CN] [conference] conf w/ AR we case status	0.5	0.5
3/30/2012	[RV] [review materials] proposed order re class cert - filing under seal	0.1	0.1

3/29/2012	[RV] [review materials] rvw panuco edits to class cert motion	2.4	2.4
3/29/2012	[PN] [phone conference] call w AR re class def	0.9	0.9
3/29/2012	[RV] [review materials] rvw proposed class def from AR	1.6	1.6
3/29/2012	[RV] [review materials] proposed order re class cert	0.4	0.4
3/29/2012	[PR] [preparation and drafting] master decl re svc recs	2.6	2.6
3/28/2012	[PR] [preparation and drafting] notes re class action / counsel dec	2.9	2.9
3/28/2012	[PR] [preparation and drafting] eml w AR re R26 disclosures	0.3	0.3
3/28/2012	[PR] [preparation and drafting] master decl re svc recs	3.3	3.3
3/27/2012	[CN] [conference] conf w/ AR re: legal research, filing under seal, exhibits, and revise brief	0.5	0.5
3/27/2012	[CN] [conference] conf w/ AR and BS re: review of records produced by City and declarations	0.5	0.5
3/26/2012	[CN] [conference] conf w/ AR and BR re: documents produced by deft	0.3	0.3
3/26/2012	[CN] [conference] conf w/ AR re: declaration brief, evidence and motion editing	0.5	0.5
3/26/2012	[CN] [conference] conf w/ AR, Ben Stormer, CP re: going through evidence	0.5	0.5
3/25/2012	[CN] [conference] discuss decl. content / template with bates sets with AS, SA, MD, MG, and AL	2.6	2.6
3/23/2012	[CN] [conference] conf w/ CP and AR re: what summaries the students have completed	0.5	0.5
3/22/2012	[RS] [research] rsrch nom dam , civ penlty, cont harm, stigma -- humphries	11.7	11.7
3/22/2012	[RV] [review materials] recount svc recs # 0281 - 1280	3.6	3.6
3/22/2012	[CN] [conference] conf w/ MG re recount svc recs # 1281 - 2480	1.1	1.1
3/21/2012	[CN] [conference] conf w/ AR re: legal theories for class cert and to respond to opp	0.5	0.5

3/21/2012	[PR] [preparation and drafting] eml doc review instructions recap	0.7	0.7
3/21/2012	[PN] [phone conference] conf w/ ben stormer re service count	0.4	0.4
3/20/2012	[CN] [conference] Meeting with Robert Mann re class action cert issues	2.1	2.1
3/19/2012	[PN] [phone conference] call w AC re case status and removal petition	1.7	1.7
3/19/2012	[RV] [review materials] eml AR re other questions re complaint	0.2	0.2
3/19/2012	[PR] [preparation and drafting] create GI element tracking template sheet (arrests, detentions, etc)	0.3	0.3
3/19/2012	[CN] [conference] meet w/ doc reviewers re GI service docs produced by city	3.6	3.6
3/19/2012	[CN] [conference] Prepare for clerk meeting	1.9	1.9
3/18/2012	[PR] [preparation and drafting] drft ackn prot order for doc revw	0.3	0.3
3/18/2012	[CN] [conference] Clerk meeting re protective order	2.1	2.1
3/15/2012	[CN] [conference] Meeting with clients re decs and case progress	3.1	3.1
3/13/2012	[RV] [review materials] GI svc docs # 10826-11109	2.3	2.3
3/12/2012	[CN] [conference] meet w HS attys re lawsuit, complaint, clients	2.2	2.2
3/12/2012	[RV] [review materials] GI svc docs # 9168-10825	5.2	5.2
3/12/2012	[RV] [review materials] GI svc docs # 9168-10825	1.9	1.9
3/12/2012	[CN] [conference] Meeting w/ Ann & Rheem	1.8	1.8
3/11/2012	[RV] [review materials] GI svc docs # 7062-9167	2.6	2.6
3/11/2012	[RV] [review materials] GI svc docs # 7062-9167	4.1	4.1
3/11/2012	[RV] [review materials] GI svc docs # 7062-9167	0.8	0.8
3/11/2012	[RV] [review materials] GI svc docs # 5125-7061	1.3	1.3
3/10/2012	[RV] [review materials] GI svc docs # 5125-7061	3.1	3.1

3/10/2012	[NC] [other non-court] remove watermark obstruction	4.8	4.8
3/1/2012	[CN] [conference] conf w/ AR re: motion for class cert	0.5	0.5
2/28/2012	[CN] [conference] expl to USC students of gang inj case	1.2	1.2
2/28/2012	[CN] [conference] Meeting re case strategy	2	2
2/23/2012	[CN] [conference] conf w/ CP and AR re: Citys failure to produce discovery and mo.	0.5	0.5
2/14/2012	[RV] [review materials] AR eml re km and decs	0.3	0.3
1/27/2012	[RV] [review materials] CCLA eml re status of case	0.3	0.3
1/17/2012	[CN] [conference] meet w/ mcgill re new gang inj	1.1	1.1
1/11/2012	[NC] [other non-court] go get service decs from comm orgs	3.3	3.3
1/11/2012	[PR] [preparation and drafting] eml to comm orgs re service decs	0.4	0.4
1/10/2012	[PR] [preparation and drafting] eml KM re class decls	0.7	0.7
12/29/2011	[CN] [conference] meet w AS re gang panelists and conf.	2.2	2.2
12/29/2011	[RS] [research] rvw Archuleta re pros gang experts	2.9	2.9
12/13/2011	[RV] [review materials] GRYD research re services for youth	2.8	2.8
12/11/2011	[RV] [review materials] LAPD Patrol trning	1.3	1.3
12/10/2011	[RV] [review materials] LAPD gang school materials 7	2.8	2.8
12/8/2011	[RV] [review materials] LAPD gang school materials (1-6)	1.1	1.1
12/8/2011	[RV] [review materials] LAPD gang school materials (1-6)	5.2	5.2
12/6/2011	[RV] [review materials] rev prot order JEM	0.6	0.6
12/5/2011	[CN] [conference] conf w/ AR and GL re: discovery and motion to compel	1.1	1.1
12/5/2011	[RV] [review materials] ICI gang school T. Austin / BVN Austin highly similar	3.1	3.1

12/5/2011	[RV] [review materials] GI training ppt - dorfman	1.1	1.1
12/5/2011	[RV] [review materials] review GI training files for patrol enforcement	2.3	2.3
12/4/2011	[RV] [review materials] review GI training files for officer and lawyer	2.4	2.4
12/3/2011	[RV] [review materials] review training files for non gang officer	2.1	2.1
12/3/2011	[RV] [review materials] review training files for gang supv	3.1	3.1
12/3/2011	[RV] [review materials] review training files for gang officer TVR	1.8	1.8
12/2/2011	[CN] [conference] conf w/ GL re: discovery status and protective order	0.5	0.5
12/1/2011	[RV] [review materials] rvw ICDA 4 rules of gang cases	0.8	0.8
12/1/2011	[RV] [review materials] review training files for gang officer gen.	3.4	3.4
12/1/2011	[RV] [review materials] review training files for gang officer gen.	1.7	1.7
11/8/2011	[PR] [preparation and drafting] ac rfp1 joint stip revise	3.3	3.3
11/30/2011	[CN] [conference] meet re Adolescent Gang Intervention Policy Proposals	2.2	2.2
11/29/2011	[CN] [conference] conf w/ AR re: motion to compel	0.6	0.6
11/28/2011	[CN] [conference] conf with AR	0.4	0.4
11/27/2011	[RV] [review materials] review training files for gang officer gen.	3.1	3.1
11/23/2011	[CN] [conference] yjc comm org injunction meeting	3.1	3.1
11/23/2011	[RV] [review materials] review training files for gang officer gen.	5.3	5.3
11/23/2011	[PR] [preparation and drafting] revs suppl joint stip post meeting	3.6	3.6
11/22/2011	[RV] [review materials] top-level review of hard drive from city	0.4	0.4
11/22/2011	[CN] [conference] confer w/rs re disc order	0.7	0.7

11/21/2011	[CN] [conference] conf w/ AR re: order on discovery	0.5	0.5
11/21/2011	[RV] [review materials] rvw disc order re joint stip 1	0.3	0.3
11/2/2011	[RV] [review materials] rev signed stip by DS	0.1	0.1
11/8/2011	[RV] [review materials] rvw d. markley dec re joint stip	0.2	0.2
11/8/2011	[RV] [review materials] rvw d. moore dec re joint stip	0.2	0.2
11/8/2011	[RV] [review materials] rvw rs dec re joint stip	2.8	2.8
11/3/2011	[CN] [conference] meet w AS re terranova and potential class member issues	1.7	1.7
11/3/2011	[PN] [phone conference] call w terranova re carlos	2.8	2.8
11/1/2011	[CN] [conference] conf w/ DS and AR re: protective order, motion to compel	0.5	0.5
10/31/2011	[RS] [research] rsch re collateral bar rule	3.7	3.7
10/31/2011	[RV] [review materials] prot order re AC RFP1	1.6	1.6
10/28/2011	[RS] [research] rsch re numerosity and subclass defs.	3.9	3.9
10/27/2011	[RV] [review materials] rvw garcia decl re service	0.3	0.3
10/27/2011	[RV] [review materials] rvw garcia paperwork re gang arrest	0.6	0.6
10/26/2011	[PN] [phone conference] call w terranova re gang arrest	2.6	2.6
10/25/2011	[RV] [review materials] Review city online injunction flier -pamphlet	1.6	1.6
10/25/2011	[RS] [research] Research automated field interview system	3.9	3.9
10/24/2011	[RS] [research] NCSC Tech rsrch re LA CCHRS specs	2.4	2.4
10/24/2011	[RS] [research] NCJRS LAPD database spec research	3.7	3.7
10/24/2011	[PR] [preparation and drafting] ac rfp1 mo compel/dec & exhibits revise	2.9	2.9
10/24/2011	[PR] [preparation and drafting] ac rfp1 mo compel/order	0.3	0.3
10/24/2011	[RV] [review materials] city privilege log	0.6	0.6

10/24/2011	[RV] [review materials] Review Rodriguez criminal case	1.1	1.1
10/24/2011	[RS] [research] Research city gang injunction guidelines	2.2	2.2
10/23/2011	[RS] [research] Research city gang injunction guidelines	3.9	3.9
10/23/2011	[RV] [review materials] Review culver city injunction	0.7	0.7
10/23/2011	[PR] [preparation and drafting] Draft motion intro	2.1	2.1
10/23/2011	[PR] [preparation and drafting] Chart injunction dates	1.3	1.3
10/20/2011	[PR] [preparation and drafting] joint stip re AC RFP1	3.6	3.6
10/17/2011	[RV] [review materials] rvw mo compel re class ID and contact info	3.8	3.8
10/15/2011	[PN] [phone conference] call w Dan re class ID and contact info	0.4	0.4
10/13/2011	[PR] [preparation and drafting] 2nd r37-1 let re ac rfp1 to rs	0.4	0.4
10/12/2011	[CN] [conference] conf w DS and AR re: deposition / meet and confer	0.7	0.7
10/7/2011	[CN] [conference] conf w AR re meeting with plaintiffs and prep for depos	0.5	0.5
10/6/2011	[RV] [review materials] rvw chris crim case demurrer tscrpt	2.4	2.4
10/6/2011	[CN] [conference] r37 conf re ac rfp1 w/ rs	1.2	1.2
10/3/2011	[RV] [review materials] pull valley injunctions and compare	2.6	2.6
9/29/2011	[PN] [phone conference] call w T. Galdino re emails	0.1	0.1
9/27/2011	[PN] [phone conference] EP at Catholic charities re latest dec	0.3	0.3
9/26/2011	[CN] [conference] community meeting re lawsuit	2.7	2.7
9/26/2011	[RV] [review materials] rvw def initl resp to RFP	1.7	1.7
9/26/2011	[PR] [preparation and drafting] r37-1 letter re disc resp to RS	2.9	2.9
9/26/2011	[PR] [preparation and drafting] AC rfp 1 r37-1 let	3.8	3.8

9/23/2011	[CN] [conference] conf with AR, GL re: community meeting	0.3	0.3
9/23/2011	[PR] [review materials] LA resp to RFP1	3.3	3.3
9/22/2011	[CN] [conference] conf w/ AR, GL re: depositions, evidence, ext's.	0.5	0.5
9/21/2011	[CN] [conference] conference with AR re: meetings, ext.	0.6	0.6
9/19/2011	[RV] [review materials] rvw Gonzales re active participation in gang	2.6	2.6
9/17/2011	[RV] [review materials] rvw gutierrez decl re service	0.3	0.3
9/17/2011	[RV] [review materials] review gutierrez dec re service	0.3	0.3
9/15/2011	[PN] [phone conference] call w limon re police threats	0.8	0.8
9/15/2011	[RV] [review materials] rvw eml from McG re dec re service	0.2	0.2
9/12/2011	[PR] [preparation and drafting] email limon re threats from police in neighborhood	0.3	0.3
9/12/2011	[CN] [conference] conf w clients re threats from police in neighborhood	2.6	2.6
9/12/2011	[CN] [conference] meeting w comm orgs and clients	3.2	3.2
9/12/2011	[PR] [preparation and drafting] edit R26's per limon	0.3	0.3
9/12/2011	[PR] [preparation and drafting] R26 disclosures - draft	1.8	1.8
9/9/2011	[PN] [phone conference] Conf call with GL re: discovery & clients; emails re: same	0.3	0.3
9/9/2011	[RS] [research] rsch re gang membership indicia	4.1	4.1
9/9/2011	[PR] [preparation and drafting] r26 initial disclosures	1.8	1.8
9/6/2011	[PN] [phone conference] conf call with GL re: cleint meeting dates & discovery; emails re same.	0.2	0.2
9/1/2011	[PN] [phone conference] conf call with AR, DS, and GL re: status of clients	0.5	0.5
8/29/2011	[PR] [preparation and drafting] POS re RFPs to gladys for file	0.3	0.3

8/29/2011	[RV] [review materials] rvw stringfellow dec re svc	0.3	0.3
8/26/2011	[PN] [phone conference] conf call with AR and GL re: next steps & client meeting	0.5	0.5
8/23/2011	[RV] [review materials] rvw Barajas re knowledge req in injunctions	2.9	2.9
8/23/2011	[PN] [phone conference] AR re AC RFP re service docs	0.6	0.6
8/23/2011	[PR] [preparation and drafting] edit AC RFP re service docs	1.7	1.7
8/23/2011	[PR] [preparation and drafting] correct handwritten decl re service and circulate	1.3	1.3
8/23/2011	[PR] [preparation and drafting] revise AC RFP1 LA GI info	2.2	2.2
8/22/2011	[CN] [conference] conference with DS and AR scheduling conference, discovery, and conf	0.8	0.8
8/22/2011	[CN] [conference] conference call with GL re: discovery plan	0.4	0.4
8/22/2011	[PN] [phone conference] LA pub def re lawsuit	1.8	1.8
8/20/2011	[PR] [preparation and drafting] sanchez re homies unidos lawsuit particpt	0.7	0.7
8/19/2011	[PR] [preparation and drafting] thak you email to comm orgs for meeting	0.2	0.2
8/19/2011	[PR] [preparation and drafting] rvs handwritten decl sheet re service	1.9	1.9
8/18/2011	[CN] [conference] conference with GL, AR, DS re: discovery needed, review pleadings	0.5	0.5
8/16/2011	[CN] [conference] meet w comm orgs re lawsuit	3.1	3.1
8/8/2011	[CN] [conference] conference with GL, AR, and DS re: hearing	0.6	0.6
8/3/2011	[PR] [preparation and drafting] edit / adjust online decl re service transmission and storage	2.7	2.7
8/2/2011	[NC] [other non-court] rush order and pick up lawsuit info flyers	1.8	1.8
8/1/2011	[RV] [review materials] rvw criollo lawsuit announcement edits	0.3	0.3

8/1/2011	[RV] [review materials] rvw huerta decl re service	0.2	0.2
8/1/2011	[PN] [phone conference] call quezada re decl re service questions	1.3	1.3
8/1/2011	[RV] [review materials] rvw quezada decl re service	0.3	0.3
8/1/2011	[PR] [preparation and drafting] rvw / edit criollo lawsuit announcement	0.7	0.7
8/1/2011	[RV] [review materials] review huerta dec re service	0.3	0.3
7/29/2011	[CN] [conference] AS expl re lawsuit and community orgs and objectives	2.2	2.2
7/29/2011	[RV] [review materials] rvw Cazarez service decl	0.6	0.6
7/26/2011	[CN] [conference] meet w MVG neighborhood re lawsuit	1.2	1.2
7/21/2011	[RV] [review materials] rvw Russo reply brief re curfew, speech , limits upon fam rlps	1.9	1.9
7/21/2011	[RV] [review materials] rvw Russo reply brief re curfew, speech , limits upon fam rlps	4.7	4.7
7/20/2011	[RV] [review materials] rvw Russo opening brief re curfew, speech , limits upon fam rlps	2.6	2.6
7/20/2011	[RV] [review materials] rvw Russo opening brief re curfew, speech , limits upon fam rlps	4.1	4.1
7/18/2011	[RV] [review materials] rvw and compare updated amerson decl re service	0.8	0.8
7/18/2011	[RS] [research] rvw Jorge P. re active participation in gang	2.3	2.3
7/18/2011	[PN] [phone conference] EP at Catholic charities re case	0.9	0.9
7/17/2011	[RV] [review materials] rvw delaney decl re service	0.4	0.4
7/8/2011	[RV] [review materials] rvw CCLA email re potential class members	0.2	0.2
7/6/2011	[CN] [conference] conference with AR, DS, and GL re: draft joint report	0.3	0.3
7/6/2011	[CN] [conference] NLG bd meeting to announce/discuss lawsuit	0.7	0.7

7/5/2011	[PN] [phone conference] gonzalez and garity re homies unidos and lawsuit pub.	1.2	1.2
6/30/2011	[PR] [preparation and drafting] edit AS post to streetgangs.com re lawsuit	0.3	0.3
6/29/2011	[PR] [preparation and drafting] pull/forward nadir demurrer hring tscrpt	0.6	0.6
6/29/2011	[RV] [review materials] QI eml re nadir	0.2	0.2
6/29/2011	[PR] [preparation and drafting] QI eml re nadir	0.2	0.2
6/29/2011	[RV] [review materials] eml AR re QI and nadir	0.2	0.2
6/29/2011	[PR] [preparation and drafting] eml re KRL re nadir	0.2	0.2
6/29/2011	[PR] [preparation and drafting] expl for GL re nadir	0.7	0.7
6/29/2011	[PN] [phone conference] EP at Catholic charities re case	1.2	1.2
6/29/2011	[RV] [review materials] review faxed dec from EP at Catholic Charities	0.3	0.3
6/28/2011	[RS] [research] rsch qual imm. re nadir	3.4	3.4
6/28/2011	[PR] [preparation and drafting] rvs compl	1.7	1.7
6/24/2011	[PN] [phone conference] call w amador re class members	1.3	1.3
6/24/2011	[CN] [conference] meet w segura re lawsuit	1.8	1.8
6/22/2011	[RV] [review materials] rvw amerson decl	0.2	0.2
6/21/2011	[PN] [phone conference] call re prior decl re lawsuit	0.5	0.5
6/20/2011	[PN] [phone conference] call re lawsuit / current status re injunction	2.2	2.2
6/20/2011	[RV] [review materials] rvw Segura service decl	0.5	0.5
6/18/2011	[PR] [preparation and drafting] draft AC RFAs re service	2.3	2.3
6/17/2011	[PR] [preparation and drafting] eml re GL edits to RFPs and impact re class cert	0.6	0.6
6/16/2011	[PN] [phone conference] call sanchez re homies unidos and lawsuit	0.7	0.7
6/16/2011	[RV] [review materials] rvw GL edits to RFPs	0.9	0.9

6/15/2011	[PN] [phone conference] call KM re lawsuit announcement	1.7	1.7
6/15/2011	[RV] [review materials] eml KM re lawsuit announcement	0.2	0.2
6/15/2011	[RV] [review materials] eml dan re RFP	0.1	0.1
6/15/2011	[RV] [review materials] alonso email re lawsuit and contacts	0.7	0.7
6/15/2011	[PN] [phone conference] AA re injunction lawsuit and contacts in community	2.2	2.2
6/13/2011	[PR] [preparation and drafting] email homeboy ind. re lawsuit	0.4	0.4
6/13/2011	[PN] [phone conference] call homebo ind. re lawsuit	0.2	0.2
6/13/2011	[PR] [preparation and drafting] rvs AS email anncmnt re lawsuit	0.6	0.6
6/13/2011	[PR] [preparation and drafting] rvs AC RFP re gang injunction info	1.2	1.2
6/13/2011	[RS] [research] rvw Tran re gang activity	1.3	1.3
6/13/2011	[PR] [preparation and drafting] rvs online dec form for lawsuit	1.4	1.4
6/13/2011	[PR] [preparation and drafting] AC RFP city	1.7	1.7
6/11/2011	[RV] [review materials] review streetgangs.com posts by neighborhood and post lawsuit announcement	2.8	2.8
6/11/2011	[RV] [review materials] review streetgangs.com posts by neighborhood and post lawsuit announcement	3.7	3.7
6/10/2011	[PN] [phone conference] CCLA expl of gang evid hearing re assoc and conditions	2.6	2.6
6/9/2011	[CN] [conference] Esperanza CCLA re client class member	1.3	1.3
6/9/2011	[PR] [preparation and drafting] eml to comm orgs re lawsuit	1.2	1.2
6/9/2011	[PR] [preparation and drafting] subsequent class claim preclusion memo	2.8	2.8
6/8/2011	[PR] [preparation and drafting] eml LA PubDef attys re class action suit	0.2	0.2

6/8/2011	[PR] [preparation and drafting] eml ICDA attys re class action suit	0.8	0.8
6/8/2011	[RS] [research] rsch re subsequent class claim preclusion	5.2	5.2
6/8/2011	[NC] [other non-court] adj to draft decs	0.4	0.4
6/8/2011	[RV] [review materials] rvw rsch from AR re liability to class members	2.3	2.3
6/8/2011	[NC] [other non-court] service dec accuracy testing	4.6	4.6
6/8/2011	[RV] [review materials] comm AR re draft dec contents for class cert purp	0.3	0.3
6/7/2011	[PR] [preparation and drafting] draft dec page re service	2.6	2.6
6/7/2011	[RS] [research] compile list and info re rec centers in gang inj areas/zones	3.1	3.1
6/6/2011	[RV] [review materials] AS gang inj target list and expl	2.2	2.2
6/6/2011	[RS] [research] gang inj class action reserach	1.8	1.8
6/6/2011	[RS] [research] gang inj class action reserach	3.4	3.4
6/3/2011	[RS] [research] rev colonia cases	2.6	2.6
6/2/2011	[CN] [conference] HS meeting re standing, 5th A, 1st A, classes, prelim inj	2.7	2.7
6/2/2011	[CN] [conference] meet w AS re HS meeting	1.6	1.6
6/2/2011	[RS] [research] rsch issues by Dan re standing, 5th A, 1st A, classes, prelim inj	3.1	3.1
6/2/2011	[RS] [research] shep/rev colonia cases	2.1	2.1
6/2/2011	[RS] [research] rev acuna cases	2.4	2.4
6/1/2011	[PN] [phone conference] conference call with GL	0.5	0.5
6/1/2011	[PR] [preparation and drafting] eml HS re GI chart	0.2	0.2
6/1/2011	[RV] [review materials] AS chart re GI school populations	2.1	2.1
6/1/2011	[PR] [preparation and drafting] prep CCA materials	1.1	1.1

6/1/2011	[PR] [preparation and drafting] prep for meeting at HS tomorrow	4.2	4.2
6/1/2011	[CN] [conference] meet w AS re GI case materials	2.3	2.3
6/1/2011	[RS] [research] shep/rev acuna cases	1.2	1.2
6/1/2011	[PR] [preparation and drafting] chart schools covd by each GI	0.9	0.9
5/31/2011	[CN] [conference] meet w AS re GI case materials	1.4	1.4
5/31/2011	[CN] [conference] meet w AS re GI case objectives	2.1	2.1
5/30/2011	[RS] [research] rsch issues by Dan re standing, 5th A, 1st A, classes, prelim inj	5.7	5.7
5/27/2011	[RS] [research] rvw Clark re gang assistance	2.8	2.8
5/27/2011	[RS] [research] det schools covd by each GI	3.3	3.3
5/25/2011	[RS] [research] rvw Galvez re gang support	2.3	2.3
5/25/2011	[RS] [research] det schools covd by each GI	4.3	4.3
5/23/2011	[RV] [review materials] eml from gladys re inj. chart	0.2	0.2
5/19/2011	[PR] [preparation and drafting] fwd gilliam docs to gladys	0.2	0.2
5/19/2011	[PR] [preparation and drafting] resend docs Dan	0.2	0.2
5/11/2011	[CN] [conference] meeting with AR, GL, and DS re: strategy and next steps in case	0.9	0.9
5/11/2011	[RV] [review materials] rvw aclu gang final order	3.2	3.2
5/10/2011	[RV] [review materials] comm and press release re aclu gang ruling	0.9	0.9
5/3/2011	[CN] [conference] meeting with GL, DS, AR re: general status of case	2.3	2.3
4/19/2011	[PR] [preparation and drafting] eml Dan and AR re return and prelim inj	0.2	0.2
4/14/2011	[RV] [review materials] rvw vasquez/fairbank file - cert	2.1	2.1
4/13/2011	[PR] [preparation and drafting] eml Dan and AR re status of docs	0.2	0.2

4/13/2011	[NC] [other non-court] rvw am compl/smmns/revsed docs	2.7	2.7
4/13/2011	[PR] [preparation and drafting] 1st am compl - edit, file	2.2	2.2
4/13/2011	[NC] [other non-court] proof svc and serve complaints -- city, trutanich, nadir, beck	2.6	2.6
4/13/2011	[RV] [review materials] rvw JG init order	0.7	0.7
4/13/2011	[PR] [preparation and drafting] ntc man filing	0.3	0.3
4/13/2011	[PR] [preparation and drafting] summons 1st A compl	0.2	0.2
4/13/2011	[PR] [preparation and drafting] g92 HS	0.5	0.5
4/13/2011	[PR] [preparation and drafting] adr form	0.2	0.2
4/13/2011	[RV] [review materials] rvw HS revisions	1.3	1.3
4/12/2011	[RV] [review materials] AR rev to compl	0.3	0.3
4/12/2011	[PR] [preparation and drafting] eml AR rev to compl	0.2	0.2
4/12/2011	[RV] [review materials] AR rev to compl	1.2	1.2
4/11/2011	[PR] [preparation and drafting] eml AR re complaint	0.1	0.1
4/11/2011	[PR] [preparation and drafting] eml AR re complaint	0.2	0.2
4/11/2011	[PR] [preparation and drafting] eml Dan re fairbank order and GI class complaint	0.1	0.1
4/11/2011	[PR] [preparation and drafting] rvs class compl	0.8	0.8
4/11/2011	[RV] [review materials] rvw class compl post conv w/ HS	2.3	2.3
4/8/2011	[PN] [phone conference] bibring re class action, martinez	0.8	0.8
4/8/2011	[RV] [review materials] rvw vasquez/fairbank file - cert	1.1	1.1
4/7/2011	[PR] [preparation and drafting] eml Dan materials re class action	0.3	0.3
4/7/2011	[CN] [conference] mt w/ dan and AR re class action	1.6	1.6
4/7/2011	[PR] [preparation and drafting] eml Dan re class action	0.2	0.2

4/6/2011	[RV] [review materials] rvw vasquez/fairbank file - cls cnsl q	0.3	0.3
4/6/2011	[RV] [review materials] rvw vasquez/fairbank file - cls cnsl q	3.1	3.1
4/4/2011	[RV] [review materials] rvw vasquez/fairbank file - cls cnsl q	0.7	0.7
4/4/2011	[RV] [review materials] rvw vasquez/fairbank file - cls cnsl q	1.2	1.2
3/30/2011	[PR] [preparation and drafting] eml bibring re fairbank order and GI class complaint	0.2	0.2
3/30/2011	[PR] [preparation and drafting] pkg for HS review	2.6	2.6
3/25/2011	[PN] [phone conference] disc re Gibson participation	0.8	0.8
3/25/2011	[PR] [preparation and drafting] edited pkg for Gibson pro bono review	1.1	1.1
3/18/2011	[PR] [preparation and drafting] CPRA LA GI Serv. LAPD	0.2	0.2
3/18/2011	[PR] [preparation and drafting] CPRA LA GI Serv. Clerk	0.2	0.2
3/18/2011	[PR] [preparation and drafting] CPRA LA GI Serv. City Atty	1.3	1.3
3/8/2011	[PR] [preparation and drafting] edited pkg for LA PubDef review	1.4	1.4
3/4/2011	[PN] [phone conference] disc w/ Gilliam re LA PubDef participation	0.7	0.7
3/4/2011	[PR] [preparation and drafting] pkg for LA PubDef review	2.6	2.6
3/4/2011	[PR] [preparation and drafting] pkg for Gibson pro bono review	3.8	3.8
2/14/2011	[RV] [review materials] LA T artcl re gang inj	0.6	0.6
2/14/2011	[PR] [preparation and drafting] comm re gang inj case with LA T	0.3	0.3
2/14/2011	[PR] [preparation and drafting] comm re gang inj case with LA T	0.2	0.2
2/9/2011	[PR] [preparation and drafting] comm re gang inj case with LA T	3.1	3.1

2/9/2011	[PN] [phone conference] call re gang inj case with LA T	1.2	1.2
2/8/2011	[CN] [conference] confer w/ clients re filing	2.6	2.6
2/8/2011	[NC] [other non-court] scan filed docs , email	0.2	0.2
2/7/2011	[NC] [other non-court] file docs, req. summons	1.2	1.2
2/5/2011	[PR] [preparation and drafting] summons cv71 and cv30	1.3	1.3
2/5/2011	[PR] [preparation and drafting] finalize class compl	2.7	2.7
1/30/2011	[PR] [preparation and drafting] revise class compl	3.8	3.8
1/13/2011	[RS] [research PR] [preparati] draft rsch class action compl	3.6	3.6
1/12/2011	[PR] [preparation and drafting] draft rsch class act compl	4.3	4.3
12/20/2010	[RV] [review materials] Albillar case re gang membership	2.3	2.3
10/7/2010	[PR] [review materials] May day class action compl	1.8	1.8
8/11/2010	[PR] [review materials] rvw towing motion & decs re class cert	5.8	5.8
8/11/2010	[PR] [review materials] rvw towing complaint re class cert	1.7	1.7
8/11/2010	[PR] [review materials] rvw strip search complaint re class cert	2.1	2.1
7/6/2010	[PR] [preparation and drafting] Letter C and A re lawsuit	0.4	0.4
5/28/2010	[RV] [review materials] Yancy Young brief re injunction constitutionality	4.3	4.3
5/25/2010	[PR] [preparation and drafting] comm re class action filing status	0.3	0.3
5/5/2010	[PR] [preparation and drafting] comm re Totten, Acuna to AP	2.7	2.7
4/9/2010	[CN] [conference] Meet w/ C and A expl retainer w/ craumer	2.9	2.9
4/4/2010	[PR] [preparation and drafting] draft retainer	2.1	2.1
1/11/2010	[PR] [preparation and drafting] CPRA Beck - Markley	1.2	1.2

10/8/2009	[PR] [review materials] Rvw Class materials	2.7	2.7
8/9/2009	[RS] [research] Number of City GI's v. County GI's	3.1	3.1
8/9/2009	[PR] [preparation and drafting] cpra req for all GI's in LA - check whether all have bad lang - potential 40 people served	0.8	0.8
	TOTAL HOURS:	**2178.7**	**2178.7**
	$765 /hr = $1,666,705.50 FEES		

DATE	DESCRIPTION OF COSTS	AMOUNT
9/20/2016	gangcase.net hosting from 4/2/16 through 9/2/16 at $9.95/month	$49.75
4/28/2016	gangcase.net hosting from 6/2/11 through 4/2/16 at $9.95/month	$577.10
3/23/2015	Check to H & S for external costs. Given to Larry Dee	$5,000.00
3/2/2016	RingCentral curfew line for 43 mo's X 5.99/month	$257.57
3/20/2012	scriptcopier 3 sets of defts service recd production	$660.00
2/7/2011	federal case filing fee	$350.00
	TOTAL COSTS:	**$6,894.42**

OLU K. ORANGE, ESQ. -- ATTORNEY

ARPINE SARDARYAN -- LAW CLERK

DATE	DESCRIPTION OF TIME	WORKED	BILLED
3/21/2012	[PR] [review materials] Document Review - service records	1.3	NO BILL
3/21/2012	[PR] [review materials] Doc Review - service records	0.6	NO BILL
3/21/2012	[PR] [review materials] Document Review - service records	1.1	NO BILL
3/20/2012	[NC] [other non-court] Deliver copies of service records for doc review	0.9	NO BILL
3/19/2012	[CN] [conference] Meeting re service doc review	1.4	NO BILL
3/18/2012	[CN] [conference] Meeting with justice squad for doc review	1.2	NO BILL
6/30/2011	[RS] [research] Reaching out to the community in search for clients	3.1	3.1
6/30/2011	[RS] [research] Reaching out to the community in search for clients	2.8	2.8
6/27/2011	[CN] [phone conference] Reached out to community members	2.4	2.4
6/20/2011	[CN] [phone conference] Reached out to community members: Youth Justice Coalition	3.6	3.6
6/20/2011	[CN] [phone conference] Reached out to community members re case	3.5	3.5
6/16/2011	[CN] [phone conference] Publicized gang case in an effort to reach out to the community	2.2	2.2
6/15/2011	[CN] [phone conference] Reached out to community members re case	3.5	3.5
6/15/2011	[CN] [phone conference] Reached out to community members re case	1.1	1.1
6/15/2011	[CN] [conference] Meeting with Alex Alonso	2.1	2.1
6/15/2011	[CN] [phone conference] Reached out to community members re case	2.9	2.9
6/14/2011	[CN] [phone conference] Reached out to community members re case	3.4	3.4
6/14/2011	[CN] [conference] Reached out to community members re impact of injunctions	2.3	2.3

6/14/2011	[CN] [phone conference] Reached out to community members re case	2.5	2.5
6/13/2011	[CN] [phone conference] Reached out to community members re case	0.7	0.7
6/13/2011	[RS] [research] Researched community members/advisors to gang injunction case	1.9	1.9
6/13/2011	[RS] [research] Researched community members/advisors to gang injunction case	3.5	3.5
6/13/2011	[RS] [research] Researched community members/advisors to gang injunction case	1.6	1.6
6/10/2011	[RS] [research] Researched gang interventionists in the community and organized them into an excel sheet.	1.3	1.3
6/10/2011	[PR] [preparation and drafting] Drafted a memo in order to reach out to the community members re: gangcase	2.9	2.9
6/10/2011	[RS] [research] Researched gang interventionists in the community and organized them into an excel sheet.	2.3	2.3
6/10/2011	[PR] [preparation and drafting] Drafted a memo in order to reach out to the community members re: gangcase	1.9	1.9
6/9/2011	[CN] [conference] Meeting with Chris (plaintiff)	1.6	1.6
6/9/2011	[RS] [research] Researched gang interventionists in the community and organized them into an excel sheet.	3.2	3.2
6/9/2011	[RS] [research] Researched gang interventionists in the community and organized them into an excel sheet.	4.2	4.2
6/8/2011	[RS] [research] Researched directions from recreation centers to recreation centers for visitation purposes	3.2	3.2
6/8/2011	[RS] [research] Researched directions from recreation centers to recreation centers for visitation purposes	4.5	4.5
6/7/2011	[RS] [research] researched recreation centers in each and every gang injunction area	2.3	2.3
6/7/2011	[RS] [research] researched recreation centers in each and every gang injunction area	2.7	2.7
6/7/2011	[RS] [research] researched recreation centers in each and every gang injunction area and placed them in excel	3.5	3.5
6/6/2011	[RS] [research] Googled community members in the area to reach out for advisement	1.3	1.3
6/6/2011	[RS] [research] researched recreation centers in each and every gang injunction area	4.8	4.8

6/6/2011	[RS] [research] researched recreation centers in each and every gang injunction area	2.2	2.2
6/2/2011	[RS] [research] Researched contacts at every high school in gang injunction areas	2.4	2.4
6/2/2011	[RS] [research] Researched contacts at every high school in gang injunction areas	3.6	3.6
6/2/2011	[CN] [conference] Meeting with Dan Stormer regarding gang case	2.7	2.7
6/2/2011	[CN] [conference] Meet w DS re upcoming meeting w DS	1.6	1.6
6/1/2011	[PR] [preparation and drafting] Preparing for meeting with Dan Stormer, Reviewing documents and case law.	2.9	2.9
5/31/2011	[RS] [research] researched LAUSD schools (high) in each and every gang injunction area	3.1	3.1
5/31/2011	[RS] [research] researched LAUSD schools (middle) in each and every gang injunction area	3.9	3.9
5/31/2011	[RS] [research] researched LAUSD schools (elementary) in each and every gang injunction area	3.1	3.1
	TOTAL HOURS:	**114.8**	**108.3**
	$150 /hr = $16,245.00 FEES		

ARPINE SARDARYAN -- LAW CLERK

Exhibit C

CD containing audio recording of "Angry Caller"

(lodged under separate cover)

ASSIGNMENT NUMBER: OKC-1
FILE NAME: VOICEMAIL - VERBATIM
DURATION: 0:00:43
TOTAL PAGES: 1

DATE OF VOICEMAIL - WEDNESDAY, MARCH 16, 2016
2:49 P.M.

TRANSCRIPTION DATE: SEPTEMBER 27, 2016

MALE VOICE: How in your right mind can you possibly defend gangbangers, even with a curfew? I know it's all about money because lawyers are pigs in this godforsaken piece of crap country we live in. And with a name like Olu, you probably deserve to be somewhere else other than this piece of crap country. But this country is falling apart because of assholes like you defending gangbangers and getting them $30 million for job training, which is the biggest scam anybody ever knew.

You got your 10 million, your 13 million. You don't really care, do you? But what a piece of shit. KNX and the news is just berating you about what you did for these gangs, you piece of shit. Fuckin' A. Get out of this fuckin' country.

(END OF VOICEMAIL)

STATE OF CALIFONRIA)
) SS.
COUNTY OF ORANGE)

I, DEANNA Z. HAAKER, CERTIFIED SHORTHAND REPORTER, LICENSE NO. 10309, FOR THE STATE OF CALIFORNIA, DO HEREBY CERTIFY;

THAT SAID RECORDING WAS TRANSCRIBED BY ME AND THEREAFTER REDUCED TO COMPUTER-AIDED TRANSCRIPTION UNDER MY DIRECTION;

THAT THE FOREGOING TRANSCRIPT AS TYPED IS A TRUE RECORD OF THE SAID PROCEEDINGS.

I FURTHER CERTIFY THAT I AM NOT INTERESTED IN THE EVENT OF THE ACTION.

WITNESS MY HAND THIS 27TH DAY OF SEPTEMBER, 2016.

DEANNA Z. HAAKER
CSR NO. 10309

DECLARATION OF LETICIA M. KIMBLE

I, Leticia M. Kimble, declare as follows:

1. I am an attorney at law, duly licensed to practice in all of the Courts of the State of California, the United States Court of Appeals for the Ninth Circuit, and the United States District Courts for the Northern, Central and Southern Districts of California. I am over 18 years of age. My business address is 3520 Overland Ave, Suite A148, Los Angeles, CA 90034. If called and sworn as a witness, I could and would competently testify to the following based on personal knowledge:
2. I am familiar with Attorney Olu K. Orange. I have known him since 2001. He was my instructor in the undergraduate trial advocacy program at the University of Southern California ("USC").
3. I graduated from USC in May of 2005. Thereafter, I attended the University of Michigan Law School and graduated in May 2008.
4. Shortly after finishing law school, I began practicing law at Los Angeles, California office of O'Melveny & Myers LLP. After O'Melveny, I practiced with Brownstein, Hyatt, Farber & Schreck LLP, and Gerard Fox Law, P.C. – both firms are also in Los Angeles.
5. In August of 2015, I opened my own law office. That same month, I contacted Mr. Orange to discuss approaches to practice that he considered useful as the owner of a small law office. When I made contact with Mr. Orange, we had an informative discussion about practicing law. However, immediately thereafter, he informed me that he had far too many requests for his services than he could handle and that he would like to have me co-counsel on a few cases that he had, as well as refer me many more cases and clients that he did not have time to assist.
6. A few days after my initial contact with Mr. Orange, he began to refer me

cases – several of them. Soon thereafter, we also signed co-counseling agreements on multiple cases.

7. Since August of 2015, Mr. Orange has referred me a steady stream of cases for which he asks no referral fee – at least a dozen. He very frequently comments to me that he is swamped with work and cannot handle very much new business.

I declare under penalty of perjury of the laws of the State of California and the United States that the foregoing is true of my own knowledge.

Executed this October 11th, 2016 at Los Angeles, California.

LETICIA M. KIMBLE, ESQ.

DECLARATION OF CHRISTOPHER TAYBACK

I, Christopher Tayback, declare as follows:

1. I am an attorney licensed to practice law in the State of California. I have been asked to make this declaration in support of Plaintiffs' Motion for Attorneys' Fees, and I understand that this declaration will be filed in support of that motion. This declaration is based on my own personal knowledge, and if called as a witness, I could and would testify to the following matters.

2. I graduated from Harvard Law School *cum laude* in 1989. I have been a practicing lawyer in California since 1989.

3. I am currently a partner at Quinn, Emanuel, Urquhart & Sullivan LLP, located at 865 S. Figueroa St., 10th Floor, Los Angeles, CA 90017, where I engage in civil and criminal litigation. Prior to joining the firm, I served as a prosecutor for eight years – first as a Deputy District Attorney in Los Angeles County and later as an Assistant United States Attorney. As a prosecutor, I took over 40 cases to jury, tried dozens more cases to the court, and litigated over 40 appeals before the Ninth Circuit.

4. Since joining the firm in 1997, I have continued to try cases in a wide range of subject matters, including patent, class actions, real estate, construction, partnership disputes, professional malpractice, contracts and fraud. All told, I have tried or arbitrated over 100 cases, civil and criminal, in multiple states, representing both plaintiffs and defendants.

5. I have been fortunate to be recognized for my work with several professional honors. These include: Fellowship in the American College of Trial Lawyers; being rated "AV Preeminent" by Martindale Hubbell; membership in the Multi-Million Dollar Advocates Forum; and recognition as one of Southern California's "Super Lawyers" for over 10 years. Further, for the past 15 years I have been invited to be a visiting instructor with the faculty teaching team for Harvard Law School's full credit clinical trial advocacy course, offered each winter.

6. I am familiar with Olu K. Orange, lead counsel on *Rodriguez v. City of Los Angeles*. I have known him since we met at Harvard Law School over a decade ago,

where he is also a member of the trial advocacy faculty teaching team, where we taught together and demonstrated model closing arguments to the students on behalf of the faculty. I find Mr. Orange to be an extraordinarily capable advocate. I have been delighted, and not surprised, to see him at the core of a number of important and well-publicized cases in our legal community, including the *Rodriguez* case.

7. I understand that Mr. Orange, a 1998 graduate of Howard University School of Law, is seeking compensation at a rate of $765 per hour in this case. I also understand that the courts have indicated that attorneys in civil rights cases should command rates on par with those billed for work on antitrust and other complex civil litigation cases. I am familiar with the rates at which my firm currently bills its attorneys for work on such cases in the Los Angeles legal market. Our lowest billed partner with a graduation year of 1998 in this market (Los Angeles) would command a rate of $995 per hour. It is my belief that Mr. Orange's requested rate of $765 per hour is reasonable.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed at Los Angeles, California on October 5th, 2016.

By: FOR PUBLIC RELEASE
Christopher Tayback

DECLARATION OF YESENIA ACOSTA

I, **YESENIA ACOSTA**, declare as follows:

1. I am over 18 years of age. I make this declaration in support of Plaintiffs' Motion for Attorney's Fees. It is based on my own personal knowledge, and if called as a witness, I could and would testify to the following matters.

2. I am an Administrative Assistant in Public Counsel's Finance and Human Resources department. As part of its ordinary course of business, Public Counsel maintains records of costs and expenses for each case in which we are involved. Attached hereto as Exhibit A are true and correct copies of receipts for Public Counsel's costs and expenses in the case *Rodriguez v. City of Los Angeles*, through October 11, 2016. Redactions have been made for items relating to other cases to the extent that a receipt contained items for more than one case.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed at Los Angeles, California on October 13, 2016.

FOR PUBLIC RELEASE

Yesenia Acosta

Public Counsel

EXPENSE FORM

Need Check By (Date): 3/20/15 Return Check To: Anne

Check Payable To: Hadsell Stormer & Renick

Send Check To:

PROJECT CODE	Grant/Prolaw #	DESCRIPTION OF EXPENSE	AMOUNT
		NON- LITIGATION COSTS	
		Out of Town Travel (Attach Detail Report)	
		Employee Welfare	
		Off Premises Parking (Attach Mileage/Parking Log)	
		Mileage (Attach Mileage/Parking Log)	
		Misc. Office Expense & Photocopy	
		Telephone	
		Postage	
		Office & Computer Supplies	
		Dues/Membership	
		Books/Publications/Subscriptions	
		Board Meetings	
		Continuing Education	
		Seminars by Public Counsel	
		Recruitment	
		Other:	
8	[redacted]	LITIGATION COSTS Mediation Fees.	1,731.67
		ProLaw Matter ID #:	
		Total $	1,731.67

Combine Mileage and Off Premises Parking Expenses in the same line, and attach Mileage Log and/or any supporting parking receipts.
All Litigation Costs require a ProLaw Matter ID, make sure to note it.

Each expense requires a specific Project Code: (Please be certain to attach appropriate back-up).

0. General
1. ALP
2. CDP
3. CLP
4. CRP
5. CVA
6. HPLP
7. IRP
8. OUL
9. SEP
10. Dev (Marathon)
11. Dev (Other)
12. Dev (DD)
13. Dev (AF)
14. Lobbying
15. Social Comm

For information regarding Grant Codes and Litigation Cost Codes, see the attached list.

Anne Richardson 3/19/15
Check Requested By Date

Approved by Supervisor Date

Approved by CEO or VP, Finance and Admin. Date

FOR PUBLIC RELEASE

Expense Form E (2/2015)

MILEAGE/PARKING LOG

NAME: Anna Richardson DATE: 2/19/15

DATE	GRANT/ PROLAW#	DESTINATION	PURPOSE/NATURE OF MTG.	MILES (RT)	PARKING
11/20/14	788257	Federal Courthouse	Oral Argument - Class Cert	10	14.00
12/12/14	"	Santa	Oral Arg - Summary Judgment	10	10.00
	(Redirect)				

POSTED

TOTAL FOR GRANT/PROLAW 35.50

OF MILES 20 x .575 = $ 11.50 TOTAL PARKING $ 24.00

TOTAL FOR GRANT/PROLAW _____

OF MILE _____ x .575 = $ _____ TOTAL PARKING $ _____

* Please attach this form to your Check Request form.

** Mileage is reimbursed at the rate of 57.5 cents ($0.575) per mile as of January 1, 2015.

Under CA insurance law, drivers must have auto liability insurance. Public Counsel's auto insurance covers persons driving on Public Counsel Business and is called *secondary* insurance coverage. You must have your own auto insurance for *primary* coverage of any losses. Uninsured employees must not use their vehicles to conduct Public Counsel-related business.

Submitted by: _____

FOR PUBLIC RELEASE

Jan 2015

Mileage Calculator

The Rand McNally mileage calculator will help you determine the mileage between any two destinations.

Enter Starting Point

A 610 S Ardmore Av

Enter Ending Point

B 312 N Spring St, L

Mileage:

5 miles

Time:

8 min

Get Mileage

Get Directions for This Route

EL PUEBLO PARKING CO
125 PASEO DE LA PLAZA
4TH FLOOR
LOS ANGELES, CA 90012
213 485 8248

Merchant ID: 802084[illegible]
Term ID: [illegible]

Sale

XXXXXXXXXXXX
VISA Entry Method: Swiped

Total: $ 14.00

11/21/14 14:54:00
Inv #: 000006 Appr Code: 001209
Apprvd: Online

Customer Copy

THANK YOU!

Rodriguez

EL PUEBLO PARKING
LOT 1 419 N MAIN ST.
LOS ANGELES CA 90012

Fee Computer Number:	[illegible]
Cashier:	[illegible]
Transaction Number:	[illegible]
Entered:	11/21/14 [illegible]
Exited:	11/21/14 [illegible]
Ticket #[illegible]	[illegible]
Rate:	$14.00
Total Fee:	$14.00
Cash:	

Thank you for choosing
[illegible] Cincinnati, Inc.
Have a nice day

EL PUEBLO DE LOS ANGELES
HISTORIC MONUMENT
Time In
Cashier
Amount

Rodriguez-Hern.

Public Counsel

EXPENSE FORM

Need Check By (Date) _____ Return Check To _____

Check Payable To Alex HARTZ

Send Check To _____

ACCOUNT	PROJECT CODE	GRANT NAME	DESCRIPTION OF EXPENSE	AMOUNT
			NON-LITIGATION COSTS	
5900			Out of Town Travel (Attach Detail Report)	
5960			Employee Welfare	
5980			Off Premises Parking	
5980			Mileage (Attach Mileage Reimbursement Log)	
6600			Misc. Office Expense & Photocopy	
6100			Telephone	
6150			Postage	
6200			Office & Computer Supplies	
6400			Dues/Membership	
6450			Books/Publications/Subscriptions	
6500			Board Meetings	
6550			Continuing Education	
6551			Seminars by Public Counsel	
6900			Recruitment	
			Other	
6750			**LITIGATION COSTS**	
			ProLaw Matter ID # 788257	
			Cost Code #	
			Total	1452

Combine Mileage and Off Premises Parking Expenses in the same line, and attach Mileage Log and/or any supporting parking receipts
All Litigation Costs require a ProLaw Matter ID, make sure to note it

Each expense requires a specific Project Code (Please be certain to attach appropriate back-up)

0. General	4. CRP	7. ALP	11. Development (DD)	14. OUL
1. CDP	5. HPLP	8. Development (Marathon)	12. Development (AF)	15. Lobbying
2. CLP	6. IRP	9. Development (Other)	13. CVA	16. Social Com

For information regarding Grant Codes and Litigation Cost Codes, see the attached list

Check [illegible] Date

Approved by CEO or VP, Finance and Admin Date

Expense Form E (1/2013)

MILEAGE REIMBURSEMENT LOG

NAME: DATE:

DATE	DESTINATION	PURPOSE/NATURE OF MEETING	MILES (RT)
3/30/15	915 Wilshire Blvd	mediation	4.5
TOTAL MILES FOR THE MONTH			

* Please attach this form to your Check Request form.

** Mileage is reimbursed at the rate of 56 cents ($0.56) per mile as of January 1, 2014.

Under CA insurance law, drivers must have auto liability insurance. Public Counsel's auto insurance covers persons driving on Public Counsel business and is called *secondary* insurance coverage. You must have your own auto insurance for *primary* coverage of any losses. Uninsured employees must not use their vehicles to conduct Public Counsel-related business.

Submitted by: FOR PUBLIC RELEASE

Jan 2014

UNITED VALET PARKING, INC.

Parking Receipt

Location F-9 tower Date 3/30/15

NOT A TICKET

Cashier _____ Amt. Paid $12

Public Counsel

EXPENSE FORM

Need Check By (Date): next pay check Return Check To: Anne Richardson

Check Payable To:

Send Check To:

PROJECT CODE	Grant/Prolaw #	DESCRIPTION OF EXPENSE	AMOUNT
8	788257 Rodriguez	**LITIGATION COSTS**	
		Out of Town Travel (Attach Detail Report)	
		Employee Welfare	
		Off Premises Parking (Attach Mileage/Parking Log)	6 00
		Mileage (Attach Mileage/Parking Log)	11 79
		Misc. Office Expense & Photocopy	
		Telephone	
		Postage	
		Office & Computer Supplies	
		Dues/Membership	
		Books/Publications/Subscriptions	
		Board Meetings	
		Continuing Education	
		Seminars by Public Counsel	
		Recruitment	
		Other	
		LITIGATION COSTS	
		ProLaw Matter ID #	
		Total $	17 79

Combine Mileage and Off Premises Parking Expenses in the same line, and attach Mileage Log and/or any supporting parking receipts.
All Litigation Costs require a ProLaw Matter ID, make sure to note it.

Each expense requires a specific Project Code (Please be certain to attach appropriate back-up).

0 General	3. CLP	6. HPLP	9. SEP	12. Dev (DD)
1 ALP	4. CRP	7. IRP	10. Dev (Marathon)	13. Dev (AF)
2 CDP	5. CVA	8. OUL	11. Dev (Other)	14. Lobbying
				15. Social Comm

For information regarding Grant Codes and Litigation Cost Codes, see the attached list.

FOR PUBLIC RELEASE

Check Requested By Date: 6/29/15

Approved by Supervisor Date

FOR PUBLIC RELEASE

Approved by CEO or VP Finance and Admin. Date: 6/29/15

FOR PUBLIC RELEASE

Expense Form E (2/2015)

MILEAGE/PARKING LOG

NAME: Anne Richardson DATE: 6/29/15

DATE	GRANT/ PROLAW#	DESTINATION	PURPOSE/NATURE OF MTG.	MILES (RT)	PARKING
6/4/15	788257	128 & Fairbanks	Deposition	20.5	6.00
	Rodriguez				

TOTAL FOR GRANT/PROLAW 788257

OF MILES 20.5 x .575 = $ 11.79 TOTAL PARKING $ 17.79

TOTAL FOR GRANT/PROLAW _____

OF MILE _____ x .575 = $ _____ TOTAL PARKING $ _____

* Please attach this form to your Check Request form.

** Mileage is reimbursed at the rate of 57.5 cents ($0.575) per mile as of January 1, 2015.

Under CA insurance law, drivers must have auto liability insurance. Public Counsel's auto insurance covers persons driving on Public Counsel Business and is called *secondary* insurance coverage. You must have your own auto insurance for *primary* coverage of any losses. Uninsured employees must not use their vehicles to conduct Public Counsel-related business.

FOR PUBLIC RELEASE

Submitted by: _____

Jan 2015

Rodriguez

CITY OF PASADENA
MARRIOTT GARAGE
(626) 577-8866
RECEIPT #2
ENTRY TIME:
06/24/15 08:33
EXIT TIME:
06/24/15 17:54
PARK-DUR.: HRS:MIN
9:09:36
AMOUNT:
US$ 6.00
KIND OF PAYMENT:
CREDITCARD
VISIT

MILEAGE/PARKING LOG

NAME: [illegible] DATE: 2/19/15

DATE	GRANT/ PROLAW#	DESTINATION	PURPOSE/NATURE OF MTG.	MILES (RT)	PARKING
11/21/14	788257	Federal Courthouse	Civil Agreement - class cert	16	14.00
12/12/14	[illegible]	Santa	Civil hrg. Summary judgments	10	10.00
	(Redirect)				

POSTED

TOTAL FOR GRANT/PROLAW 35.50

OF MILES 20 x .575 = $ 11.50 TOTAL PARKING $ 24.00

TOTAL FOR GRANT/PROLAW _____

OF MILE _____ x .575 = $ _____ TOTAL PARKING $ _____

- Please attach this form to your Check Request form.
- ** Mileage is reimbursed at the rate of 57.5 cents ($0.575) per mile as of January 1, 2015.

Under CA insurance law, drivers must have auto liability insurance. Public Counsel's auto insurance covers persons driving on Public Counsel Business and is called *secondary* insurance coverage. You must have your own auto insurance for *primary* coverage of any losses. Uninsured employees must not use their vehicles to conduct Public Counsel-related business.

FOR PUBLIC RELEASE

Submitted by: _____

Jan 2015

Mileage Calculator

The Rand McNally mileage calculator will help you determine the mileage between any two destinations.

Enter Starting Point

A 610 S Ardmore Av

Enter Ending Point

B 312 N Spring St, L

Mileage:

5 miles

Time:

8 min

Get Mileage

Get Directions for This Route

EL PUEBLO PARKING LO
125 PASEO DE LA PLAZA
4TH FLOOR
LOS ANGELES, CA 90012
213 485 8248

Merchant ID: 8828840859
Term ID: 8831948888820894465840

Sale

xxxxxxxxxxx
VISA Entry Method: Swiped

Total: $ 14.00

11/21/14 14:54:00
Inv #: 000006 Appr Code: 001209
Approvd: Online

Customer Copy

THANK YOU

Rodriguez

EL PUEBLO PARKING
LOT 1 419 N MAIN ST.
LOS ANGELES CA 90012

Vee Computer Number:
Cashier:
Transaction Number:
Entered:
Exited:
Ticket #0076
Rate:
Total fee:
Cash:

Terminal ID #11
11/21/14
11/21/14
Dispenser #
DATE
$14.00
$14.00

Thank you for choosing
Secure Cincinnati, Inc.
Have a nice day

EL PUEBLO DE LOS ANGELES
HISTORIC MONUMENT
RECEIVED
Amount
Cashier
Time In
VALIDATED

Public Counsel

EXPENSE FORM

Need Check By (Date): Next paycheck Return Check To:

Check Payable To: Anne Richardson

Send Check To:

PROJECT CODE	Grant/Prolaw #	DESCRIPTION OF EXPENSE	AMOUNT
		NON- LITIGATION COSTS	
		Out of Town Travel (Attach Detail Report)	
		Employee Welfare	
		Off Premises Parking (Attach Mileage/Parking Log)	
		Mileage (Attach Mileage/Parking Log)	
		Misc. Office Expense & Photocopy	
		Telephone	
		Postage	
		Office & Computer Supplies	
		Dues/Membership	
		Books/Publications/Subscriptions	
		Board Meetings	
		Continuing Education	
		Seminars by Public Counsel	
		Recruitment	
		Other	
OUL	788257	**LITIGATION COSTS** parking/mileage for [illegible]	$19.75
		ProLaw Matter ID #	
			Total $

Combine Mileage and Off Premises Parking Expenses in the same line, and attach Mileage Log and/or any supporting parking receipts
All Litigation Costs require a ProLaw Matter ID, make sure to note it

Each expense requires a specific Project Code (Please be certain to attach appropriate back-up)

0 General	3 CLP	6 HPLP	9 SEP	12 Dev (DD)
1 ALP	4 CRP	7 IRP	10 Dev (Marathon)	13 Dev (AF)
2 CDP	5 CVA	8 OUL	11 Dev (Other)	14 Lobbying
				15 Social Comm

For information regarding Grant Codes and Litigation Cost Codes, see the attached list

FOR PUBLIC RELEASE

9/3/15

Check Requested By Date Approved by Supervisor Date

Approved by ED or VP, Finance and Admin Date

Expense Form [illegible] 2015

MILEAGE/PARKING LOG

NAME: Anne Richardson DATE: Sept 3, 2015

DATE	GRANT/ PROLAW#	DESTINATION	PURPOSE/NATURE OF MTG.	MILES (RT)	PARKING
8/31/15	788257/ Rodriguez	US Courthouse (carpool with Alisa Hartz)	Mediation	10	14.00

TOTAL FOR GRANT/PROLAW __788257_____

OF MILES __10_____x .575 = $___5.75___ TOTAL PARKING $____14.00_____

TOTAL FOR GRANT/PROLAW _____

OF MILE _____x .575 = $_____ TOTAL PARKING $_____

- Please attach this form to your Check Request form.
- Mileage is reimbursed at the rate of 57.5 cents ($0.575) per mile as of January 1, 2015.

Under CA insurance law, drivers must have auto liability insurance. Public Counsel's auto insurance covers persons driving on Public Counsel Business and is called *secondary* insurance coverage. You must have your own auto insurance for *primary* coverage of any losses. Uninsured employees must not use their vehicles to conduct Public Counsel related business.

Submitted by: _____ Sept. 3, 2015

EL PUEBLO PARKING
LOT 1 419 N MAIN ST.
LOS ANGELES CA 90012

Pay Computer Number: 3
Cashier: Supervisor ID #176
Transaction Number: 19
Entered: 08/31/15 09:47
Exited: 08/31/15 15:50
Ticket #2645 Discount #1
Rate: DAILY
Total Fee: $14.00
Cash: $14.00

Thank you for choosing
Abaco Cincinnati, Inc.
Have a nice day

EL PUEBLO PARKING LO
175 PASEO DE LA PLAZA
4TH FLOOR
LOS ANGELES, CA 90012
213-485-8244

Merchant ID: 882884865
Term ID: 001[illegible]

Sale

XXXXXXXXXXX
VISA Entry Method: Swiped

Total: $ 14.00

08/31/15 15:51:22
Inv #: 000006 Appr Code: 03668C
Apprvd: Online

Customer Copy
THANK YOU!

Public Counsel

EXPENSE FORM

Need Check By (Date): paycheck is fine Return Check To: _____

Check Payable To: _____

Send Check To: Anne Richardson

PROJECT CODE	Grant/Prolaw #	DESCRIPTION OF EXPENSE	AMOUNT
		NON- LITIGATION COSTS	
		Out of Town Travel (Attach Detail Report)	
		Employee Welfare	
		Off Premises Parking (Attach Mileage/Parking Log)	
8	788257	Mileage (Attach Mileage/Parking Log)	33.25
3		~~Misc. Office Expense & Photocopy~~ # Mileage/Parking	19.75
		Telephone	
		Postage	
		Office & Computer Supplies	
		Dues/Membership	
		Books/Publications/Subscriptions	
		Board Meetings	
		Continuing Education	
		Seminars by Public Counsel	
		Recruitment	
		Other:	
		LITIGATION COSTS	
		ProLaw Matter ID #: _____	
		Total $	53.00

Combine Mileage and Off Premises Parking Expenses in the same line, and attach Mileage Log and/or any supporting parking receipts.
All Litigation Costs require a ProLaw Matter ID, make sure to note it.

Each expense requires a specific Project Code: (Please be certain to attach appropriate back-up).

0. General	3. CLP	6. HPLP	9. SEP	12. Dev (DD)
1. ALP	4. CRP	7. IRP	10. Dev (Marathon)	13. Dev (AF)
2. CDP	5. CVA	8. OUL	11. Dev (Other)	14. Lobbying
				15. Social Comm

For information regarding Grant Codes and Litigation Cost Codes, see the attached list.

FOR PUBLIC RELEASE — 8/24/14 — FOR PUBLIC RELEASE — 8-24-16

Check Requested By — Date — Approved by Supervisor — Date

Approved by CEO or VP, Finance and Admin. — Date

Expense Form E (2/2015)

Rodriguez

CITY OF PASADENA
MARRIOTT GARAGE
(626) 577-8963
RECEIPT A3
ENTRY TIME:
07/27/16 15:18
EXIT TIME:
07/27/16 17:10
PARK-DUR.: HRS:MIN
0:01:52
AMOUNT:
US$ 2.00
KIND OF PAYMENT:
CREDITCARD
VISIT

Rodriguez

LI PUBLIC PARKING
125 PASEO DE LA PLAZA
4TH FLOOR
LOS ANGELES, CA. 90012
213 485 8248

Sale

XXXXXXXXXXXX
VISA Entry Method: Chip

Total: $ 00

07/29/16 12:08:37
Inv #: 000000003 Appr Code: 05145C
Approved: Online

VISA
AID: A0000000031010
TVR: 80 80 00 80 00
TSI: F8 00

Customer Copy
THANK YOU!

LI PUBLIC PARKING
125 PASEO DE LA PLAZA
4TH FLOOR
LOS ANGELES, CA. 90012
213 485 8248

Sale

XXXXXXXXXXXX
VISA Entry Method: S...d

Total: $ 14.00

07/15/16 ...:22
Inv #: 000000002 Appr Code: 05070
Approved: Online

Customer Copy
THANK YOU!

Public Counsel

EXPENSE FORM

Need Check By (Date) _____ Return Check To _____

Check Payable To Alisa HARTZ

Send Check To _____

PROJECT CODE	Grant/Prolaw #	DESCRIPTION OF EXPENSE	AMOUNT
~~788257~~ OUL	788257	**NON- LITIGATION COSTS**	
		Out of Town Travel (Attach Detail Report)	
		Employee Welfare	
		Off Premises Parking (Attach Mileage/Parking Log)	14
		Mileage (Attach Mileage/Parking Log)	3.22
		Misc. Office Expense & Photocopy	
		Telephone	
		Postage	
		Office & Computer Supplies	
		Dues/Membership	
		Books/Publications/Subscriptions	
		Board Meetings	
		Continuing Education	
		Seminars by Public Counsel	
		Recruitment	
		Other	
		LITIGATION COSTS	
		ProLaw Matter ID # 788257	
		Total $	17.22

Combine Mileage and Off Premises Parking Expenses in the same line, and attach Mileage Log and/or any supporting parking receipts.
All Litigation Costs require a ProLaw Matter ID, make sure to note it.

Each expense requires a specific Project Code (Please be certain to attach appropriate back-up)

0 General	3 CLP	6 HPLP	9 SEP	12 Dev (DD)
1 ALP	4 CRP	7 IRP	10 Dev (Marathon)	13 Dev (AF)
2 CDP	5 CVA	8 OUL	11 Dev (Other)	14 Lobbying
				15 Social Comm

For information regarding Grant Codes and Litigation Cost Codes, see the attached list.

FOR PUBLIC RELEASE

9/14/15

Check Requested By _____ Date _____ Approved by Supervisor _____ Date _____

FOR PUBLIC RELEASE

Approved by CEO or VP Finance and Admin _____ Date _____

Expense Form F (2/2015)

MILEAGE/PARKING LOG

NAME: DATE:

DATE	GRANT/ PROLAW#	DESTINATION	PURPOSE/NATURE OF MTG.	MILES (RT)	PARKING
6/23	788257	Fed Courthouse 312 N. Spring St	pretrial conference	5.6	14

TOTAL FOR GRANT/PROLAW _STAR_____

OF MILES 5.6 x .575 = $3.22 TOTAL PARKING $ 14

TOTAL FOR GRANT/PROLAW ____DPH_____

OF MILE _____ x .575 = $_____ TOTAL PARKING $_____

* Please attach this form to your Check Request form.

** Mileage is reimbursed at the rate of 57.5 cents ($0.575) per mile as of January 1, 2015.

Under CA insurance law, drivers must have auto liability insurance. Public Counsel's auto insurance covers persons driving on Public Counsel Business and is called *secondary* insurance coverage. You must have your own auto insurance for *primary* coverage of any losses. Uninsured employees must not use their vehicles to conduct Public Counsel-related business.

Submitted by: _____ FOR PUBLIC RELEASE

Jan 2015

Public Counsel

EXPENSE FORM

Need Check By (Date): next paycheck — Return Check To: _____

Check Payable To: Anne Richardson

Send Check To: _____

PROJECT CODE	Grant/Prolaw #	DESCRIPTION OF EXPENSE	AMOUNT
		NON- LITIGATION COSTS	
8		Out of Town Travel (Attach Detail Report)	
		Employee Welfare	
8	78257-318	Off Premises Parking (Attach Mileage/Parking Log)	Tol 32.00
8	78257 14.58/1	Mileage (Attach Mileage/Parking Log)	19.50
		Misc. Office Expense & Photocopy	
		Telephone	
		Postage	
		Office & Computer Supplies	
		Dues/Membership	
		Books/Publications/Subscriptions	
		Board Meetings	
8		Continuing Education	
		Seminars by Public Counsel	
		Recruitment	
		Other	
		LITIGATION COSTS	
		ProLaw Matter ID #:	
			Total $

Combine Mileage and Off Premises Parking Expenses in the same line, and attach Mileage Log and/or any supporting parking receipts.
All Litigation Costs require a ProLaw Matter ID, make sure to note it.

Each expense requires a specific Project Code. (Please be certain to attach appropriate back-up).

0. General	3. CLP	6. HPLP	9. SEP	12. Dev (DD)
1. ALP	4. CRP	7. IRP	10. Dev (Marathon)	13. Dev (AF)
2. CDP	5. CVA	8. OUL	11. Dev (Other)	14. Lobbying
				15. Social Comm

For information regarding Grant Codes and Litigation Cost Codes, see the attached list.

FOR PUBLIC RELEASE

10/6/15

Check Requested By — Date — Approved by Supervisor — Date

Approved by CFO or VP, Finance and Admin — Date

Expense Form E (2/2015)

MILEAGE/PARKING LOG

NAME: Irene Rodriguez DATE: 10/6/15

DATE	GRANT/ PROLAW#	DESTINATION	PURPOSE/NATURE OF MTG.	MILES (RT)	PARKING
9/12	788257	Hadsell	Rodriguez Meeting w/prosecutor re: bail	16	4.00
9/22	"	Federal Courthouse	Rodriguez Mediation	9	14.00

TOTAL FOR GRANT/PROLAW 788257

OF MILES 25 x .575 = $ 14.38 TOTAL PARKING $ 18.00

TOTAL FOR GRANT/PROLAW _____

OF MILE _____ x .575 = $ _____ TOTAL PARKING $ _____

* Please attach this form to your Check Request form.

** Mileage is reimbursed at the rate of 57.5 cents ($0.575) per mile as of January 1, 2015.

Under CA insurance law, drivers must have auto liability insurance. Public Counsel's auto insurance covers persons driving on Public Counsel Business and is called *secondary* insurance coverage. You must have your own auto insurance for *primary* coverage of any losses. Uninsured employees must not use their vehicles to conduct Public Counsel-related business.

FOR PUBLIC RELEASE

Submitted by: _____

Jan 2015

Friendly Cab
Bay Area Dispatched
536-3000

Master Charge Visa Senior Citizen Scrip Accepted

The Sum of $ 40.00

From _____ To _____

Cab No 090 Driver _____ Date 9/22/15

Sale

Sale

Total: $ 14.00

Total: $ 14.00

Southwest Airlines RECEIPT

DATE 24SEP15 CONFIRMATION NUMBER AGENT e112376 EXPIRATION DATE 21AUG16 TICKET#

From	To	Flt	Date	Dep	Arr	RC
LAX	OAK	1927	24SEP	450P	600P	N
OAK	LAX	4227	26SEP	335P	450P	Y

Customer Name	Base Fare	Fees Taxes	Total	Estimated Earn Points
RICHARDSON/ANNE KENDRI	257 49	47 51	305 00	2333
TICKET TOTAL	257 49	47 51	305 00	

AX ######### 4004 Richardson/Anne $167 00
TP *AX AUTH $167 00 CTKT $138 00

Rapid Rewards points earned are only estimates
Not a Member? Visit southwest.com and sign up today!

Public Counsel

EXPENSE FORM

Need Check By (Date) paycheck Return Check To Anne Richardson

Check Payable To

Send Check To

PROJECT CODE	Grant/Prolaw #	DESCRIPTION OF EXPENSE	AMOUNT
		NON- LITIGATION COSTS	
		Out of Town Travel (Attach Detail Report)	
		Employee Welfare	
OUL/8	788257	Off Premises Parking (Attach Mileage/Parking Log)	19.75
		Mileage (Attach Mileage/Parking Log)	
		Misc. Office Expense & Photocopy	
		Telephone	
		Postage	
		Office & Computer Supplies	
		Dues/Membership	
		Books/Publications/Subscriptions	
		Board Meetings	
		Continuing Education	
		Seminars by Public Counsel	
		Recruitment	
		Other	
		LITIGATION COSTS	19.75
		ProLaw Matter ID # 788257	
			Total $

Combine Mileage and Off Premises Parking Expenses in the same line, and attach Mileage Log and/or any supporting parking receipts.
All Litigation Costs require a ProLaw Matter ID, make sure to note it

Each expense requires a specific Project Code (Please be certain to attach appropriate back-up)

0. General	3. CLP	6. HPLP	9. SEP	12. Dev (DD)
1. ALP	4. CRP	7. IRP	10. Dev (Marathon)	13. Dev (AF)
2. CDP	5. CVA	8. OUL	11. Dev (Other)	14. Lobbying
				15. Social Comm

For information regarding Grant Codes and Litigation Cost Codes, see the attached list

FOR PUBLIC RELEASE

Check Requested By 11/17/15 Date Approved by Supervisor Date

Approved by CEO or VP, Finance and Admin Date

Expense Form E (2/2015)

MILEAGE/PARKING LOG

NAME: Anne Richardson DATE: 11/17/15

DATE	GRANT/ PROLAW#	DESTINATION	PURPOSE/NATURE OF MTG.	MILES (RT)	PARKING
11/12/15	788257	US Courthouse	Mediation	10	14.00

TOTAL FOR GRANT/PROLAW 788257

OF MILES 10 x .575 = $ 5.75 TOTAL PARKING $ 14.00

TOTAL FOR GRANT/PROLAW _____

OF MILE _____ x .575 = $ _____ TOTAL PARKING $ _____

- Please attach this form to your Check Request form.
- ** Mileage is reimbursed at the rate of 57.5 cents ($0.575) per mile as of January 1, 2015.

Under CA insurance law, drivers must have auto liability insurance. Public Counsel's auto insurance covers persons driving on Public Counsel Business and is called *secondary* insurance coverage. You must have your own auto insurance for *primary* coverage of any losses. Uninsured employees must not use their vehicles to conduct Public Counsel-related business.

Submitted by: FOR PUBLIC RELEASE

Jan 2015

MILEAGE/PARKING LOG

NAME: Anne Richardson DATE:

DATE	GRANT/ PROLAW#	DESTINATION	PURPOSE/NATURE OF MTG.	MILES (RT)	PARKING
7/27/16	Rodriguez 788257	Co-counsel Office Pasadena	Prep for Hearing on Preliminary Approval	20	2.00

TOTAL FOR GRANT/PROLAW 788257

OF MILES 30 x .575 = $ 17.25 TOTAL PARKING $ 16.00

TOTAL FOR GRANT/PROLAW _____

OF MILE _____ x .575 = $ _____ TOTAL PARKING $ _____

* Please attach this form to your Check Request form.

** Mileage is reimbursed at the rate of 57.5 cents ($0.575) per mile as of January 1, 2015.

Under CA insurance law, drivers must have auto liability insurance. Public Counsel's auto insurance covers persons driving on Public Counsel Business and is called *secondary* insurance coverage. You must have your own auto insurance for *primary* coverage of any losses. Uninsured employees must not use their vehicles to conduct Public Counsel-related business.

Submitted by: _____ FOR PUBLIC RELEASE

Jan 2015

EL PUEBLO PARKING
LOT 1 419 N MAIN ST.
LOS ANGELES CA 90012

Fee Computer Number:	3
Cashier:	Supervisor ID #126
Transaction Number:	12
Entered:	11/10/15 12:53
Exited:	11/10/15 16:24
Ticket #36779	Dispenser #1
Rate:	DAILY
Total Fee:	$14.00
Cash:	$14.00

Thank you for choosing
Amano Cincinnati, Inc.
Have a nice day

EL PUEBLO PARKING LO
125 PASEO DE LA PLAZA
4TH FLOOR
LOS ANGELES, CA 90012
213 485 8248

Sale

XXXXXXXXXXXX
VISA Entry Method: Ch

Total: $ 14.00

11/10/15 16:25:21
Inv #: 000000006 Appr Code: 056450
Approval: Online

VISA
AID: A0000000031010
TVR: 00 80 08 80 00
TSI: F8 00

Customer Copy
THANK YOU

Public Counsel

EXPENSE FORM

Need Check By (Date) paycheck Return Check To Anne Richardson

Check Payable To

Send Check To

PROJECT CODE	Grant/Prolaw #	DESCRIPTION OF EXPENSE	AMOUNT
		NON- LITIGATION COSTS	
		Out of Town Travel (Attach Detail Report)	
		Employee Welfare	
		Off Premises Parking (Attach Mileage/Parking Log)	
7	788257	Mileage (Attach Mileage/Parking Log)	39.50
		~~Misc. Office Expense & Photocopy~~	
		~~Telephone~~	
		Postage	
		Office & Computer Supplies	
		Dues/Membership	
		Books/Publications/Subscriptions	
		Board Meetings	
		Continuing Education	
		Seminars by Public Counsel	
		Recruitment	
		Other	
		LITIGATION COSTS	
		ProLaw Matter ID #	
		Total:	

Combine Mileage and Off Premises Parking Expenses in the same line, and attach Mileage Log and/or any supporting parking receipts
All Litigation Costs require a ProLaw Matter ID, make sure to note it

Each expense requires a specific Project Code. (Please be certain to attach appropriate back-up)

0. General	3. CLP	6. HPLP	9. SEP	12. Dev (DD)
1. ALP	4. CRP	7. IRP	10. Dev (Marathon)	13. Dev (AF)
2. CDP	5. CVA	8. OUL	11. Dev (Other)	14. Lobbying
				15. Social Comm

For information regarding Grant Codes and Litigation Cost Codes, see the attached list

FOR PUBLIC RELEASE

3/16/16

Check Requested By Date Approved by Supervisor Date

FOR PUBLIC RELEASE

Approved by CEO or VP, Finance and Admin Date

Expense Form E (2/2015)

Public Counsel

EXPENSE FORM

Need Check By (Date): _____ Return Check To: _____

Check Payable To: Alisa HARTZ

Send Check To: _____

PROJECT CODE	Grant/Prolaw #	DESCRIPTION OF EXPENSE	AMOUNT
		NON- LITIGATION COSTS	
		Out of Town Travel (Attach Detail Report)	
		Employee Welfare	
		Off Premises Parking (Attach Mileage/Parking Log)	20 —
		Mileage (Attach Mileage/Parking Log)	MILEAGE 14 69
		Misc. Office Expense & Photocopy	
		Telephone	
		Postage	
		Office & Computer Supplies	
		Dues/Membership	
		Books/Publications/Subscriptions	
		Board Meetings	
		Continuing Education	
		Seminars by Public Counsel	
		Recruitment	
		Other.	
		LITIGATION COSTS	
		ProLaw Matter ID # 788257	
		Total $	34 69

Combine Mileage and Off Premises Parking Expenses in the same line, and attach Mileage Log and/or any supporting parking receipts.
All Litigation Costs require a ProLaw Matter ID, make sure to note it.

Each expense requires a specific Project Code. (Please be certain to attach appropriate back-up).

0. General	3. CLP	6. HPLP	9. SEP	12. Dev (DD)
1. ALP	4. CRP	7. IRP	10. Dev (Marathon)	13. Dev (AF)
2. CDP	5. CVA	8. OUL	11. Dev (Other)	14. Lobbying
				15. Social Comm

For information regarding Grant Codes and Litigation Cost Codes, see the attached list.

FOR PUBLIC RELEASE

8/5/16

Date

Approved by Supervisor

Date

FOR PUBLIC RELEASE

Approved by CEO or VP, Finance and Admin

Date

Expense Form E (2/2015)

MILEAGE/PARKING LOG

NAME: Anne Richards DATE: 3-15-16

DATE	GRANT/ PROLAW#	DESTINATION	PURPOSE/NATURE OF MTG.	MILES (RT)	PARKING
3/4	788257	Courthouse	Settlement Conf	10	14.00
3/11	"	"	"	"	"

TOTAL FOR GRANT/PROLAW 788257

OF MILES 20 x .575 = $ 11.50 TOTAL PARKING $ 28.00

TOTAL FOR GRANT/PROLAW

OF MILE ___ x .575 = $ ___ TOTAL PARKING $ ___

- Please attach this form to your Check Request form.
- Mileage is reimbursed at the rate of 57.5 cents ($0.575) per mile as of January 1, 2015.

Under CA insurance law, drivers must have auto liability insurance. Public Counsel's auto insurance covers persons driving on Public Counsel Business and is called *secondary* insurance coverage. You must have your own auto insurance for *primary* coverage of any losses. Uninsured employees must not use their vehicles to conduct Public Counsel-related business.

Submitted by: _____

Jan 2015

Sale

Total: $ 14.00

Thank you for choosing

Have a nice day

Paseo Colorado

Sale

Total: $ 14.00

CITY NATIONAL PLA

LOS ANGELES

RECEIPT

ENTRY TIME:

03/15/16 13:42

EXIT TIME:

03/15/16 1 :1

PARK DUR.: HRS:MIN

0:01:52

AMOUNT:

37.00

KIND OF PAYMENT:

VISA

XXXXXXXXXXXX.

AUTH. CODE02692C

REF.

41

THANK YOU FOR YOUR

Rodriguez

MILEAGE/PARKING LOG

NAME: Alisa HARTZ DATE: 8/5/16

DATE	GRANT/ PROLAW#	DESTINATION	PURPOSE/NATURE OF MTG.	MILES (RT)	PARKING
7/27/16	788257	Hall of Justice	~~meet~~ hearing preparation	23	6
7/29/16	788257	Spring St Courthouse	hearing	42	14

TOTAL FOR GRANT/PROLAW _____

OF MILES 272 x .54 = $ 146.69 TOTAL PARKING $ 20

TOTAL FOR GRANT/PROLAW _____

OF MILE _____ x .54 = $_____ TOTAL PARKING $_____

* Please attach this form to your Check Request form.

** Mileage is reimbursed at the rate of 54 cents ($0.54) per mile as of January 1, 2016.

Under CA insurance law, drivers must have auto liability insurance. Public Counsel's auto insurance covers persons driving on Public Counsel Business and is called *secondary* insurance coverage. You must have your own auto insurance for *primary* coverage of any losses. Uninsured employees must not use their vehicles to conduct Public Counsel-related business.

FOR PUBLIC RELEASE

Submitted by: _____

Jan 2016

Rodriguez # 788257 Phone Codes and Copies

Dec-15	
Total copies	67
	5093
	5160

Oct-15	
Total copies	5020
	67
	5087

Sep-15	
Total copies	4822
	67
	4889
Total phone codes	**$0.12**

Jul-15	
Total copies	4268
	67
	4335
Total phone codes	**$2.05**

Jun-15	
Total copies	67
	4191
	4258
Total phone codes	**$2.93**

Apr-15	
Total copies	332
Total phone codes	**$0.92**

Mar-15	
Total copies	332
Total phone codes	**$5.15**

Jan-16	
Total copies	6312
	6312

March 2015 - Jan 2016	
Actual Total - Copies	**30705**
Actual Total - Phone Code	**$11.17**

Michael Michner

From: Yesenia Acosta
Sent: Thursday, October 13, 2016 11:27 AM
To: Michael Michner
Subject: RE: Costs for redwells

From: Paul Rouggie
Sent: Friday, March 18, 2016 3:57 PM
To: Anne Richardson
Cc: Michael Michner
Subject: RE: Costs for redwells

1 Box has 10 folders in it @ $19.95 per box.

3 boxes = $59.85
2 Folders = $3.99
Sub = $63.84
Tax = 5.75
Total = $69.59

From: Paul Rouggie
Sent: Friday, March 18, 2016 3:43 PM
To: Anne Richardson
Subject: RE: Costs for redwells

Give me a second to figure it out

From: Anne Richardson
Sent: Friday, March 18, 2016 3:37 PM
To: Paul Rouggie
Cc: Michael Michner
Subject: Costs for redwells

We have used 32 redwells (accordion files) in Rodriguez, mostly the normal letter size.
How much would that be in costs, Roug?
We are going to include it in our total bill to opp counsel.
Anne

Anne Richardson, Esq.
Director
Consumer Law Project

Public Counsel
610 S. Ardmore Avenue, Los Angeles, CA 90005
(213) 385-2977 x146 | (213) 385-9089 fax
arichardson@publiccounsel.org
www.publiccounsel.org

EDWINA BARVOSA, PhD
Associate Professor
University of California, Santa Barbara
5142 Hollister Ave. Box 202
Santa Barbara, CA 93111
Tax ID:

c/o Anne Richardson, Esq.
Associate Director
Opportunity Under Law ~ Public Counsel
610 S. Ardmore Ave
Los Angeles, CA 90005

Statement Date
October 1, 2015

General Business — Statement

Fees for March 4-6, 2015

March 4-6, 2015	Document Review, Research, and Preparation of Report Draft 13.33 hours	$2,000
	Balance Due	$2,000
	Please Remit	$2,000

Thank you for the opportunity to assist you!

This Balance Due is payable upon receipt of Statement. Please remit at your earliest convenience.

EDWINA BARVOSA, PhD
Associate Professor
University of California, Santa Barbara
5142 Hollister Ave. Box 202
Santa Barbara, CA 93111
Tax ID: -

c/o Anne Richardson, Esq.
Associate Director
Opportunity Under Law – Public Counsel
610 S. Ardmore Ave
Los Angeles, CA 90005

Statement Date:
March 9, 2016

General Business — Statement

Fees for March 4-Aug 28, 2015

March 4	Document review and analysis; preparation of preliminary report sketch; partial draft 13.3 hours	$1999.50
March 5-9	Additional analysis and itemization of harms to class, 2.5 hours; telephone meeting 1 hour; revision and further development of report 16 hours; telephone meeting 30 mins (20 hours total)	$3000
May 2	New document review; report analysis for editing 4 hours	$ 600
May 3-5	Polishing and final editing of report 9.5 hours; telephone meeting .5 hours (total 10 hours)	$1500
May 19	Deposition preparation, new document review, compiling of reference materials for counsel, 4 hours	$ 600
May 20	Deposition 3 hours	Paid
June 11	Preparation of potential questions for class members, 30 mins	No charge
June 11-12	Deposition review and correction, 6 hours	No charge
Aug 28	In person meeting 2 hours, travel time 2 hours (4 hours total)	No charge
	Total Services rendered 51.33 hours @ $150/hr	
	Total Balance for Services Rendered	$7,699.50
	Credit for Payment (advanced by Public Counsel 10/2015)	-2,000.00
	Remaining Balance Due	$5699.50
	Please Remit	**$5699.50**

Thank you for the opportunity to assist you!
This Balance Due is payable upon receipt of Statement. Please remit at your earliest convenience.

DECLARATION OF WILLIAM H. HAKE

I, William M. Hake, declare as follows:

1. I am an attorney licensed to practice law in the state of California. I make this declaration in support of Plaintiffs' Motion for Attorney's Fees. It is based on my own personal knowledge, and if called as a witness, I could and would testify to the following matters.

2. I presently serve as regional managing partner of the San Francisco office of Wilson Elser, a firm of nearly 800 attorneys ranked in the Am Law 200 and in the top 50 of the *National Law Journal*. I graduated from University of the Pacific, McGeorge School of Law in 1983 and received my B.S. from San Jose State University in 1977. I am admitted to the California Bar and to the following courts: U.S. Court of Appeals for the Ninth Circuit; U.S. District Court for the Central, Eastern, Northern, and Southern Districts of California, Southern District of Texas, District of Hawaii, and Northern District of Illinois; and California State Supreme Court.

3. I am a litigation attorney with national trial counsel, mediation and litigation management experience. My practice is primarily in litigation, including toxic tort defense, product liability, construction defects, intellectual property, director and officer defense, legal malpractice defense and medical malpractice defense. Prior to founding Hake Law in 2011, I spent 14 years as lead trial counsel at a firm in San Francisco and Los Angeles, and six years as a trial attorney and partner at another San Francisco firm. In addition, I served in the role of prosecutor as an assistant district attorney for the city and county of San Francisco.

4. For more than 25 years, I have taught and lectured at Harvard University School of Law and Stanford University School of Law on trial advocacy for the National Institute of Trial Advocacy. In addition, I have lectured on trial practice, evidence, civil litigation and mediation for the California State Bar Continuing Education Program and for the University of San Francisco School of Law. I also have taught alternative dispute resolution and mediation for the U.S. Department of Justice

and in the federal practice program for the federal court in Northern California. I am rated AV by Martindale-Hubbell. In 2016, I was selected for inclusion in *Northern California Super Lawyers*.

5. I am familiar with Dan Stormer, Anne Richardson and Olu K. Orange, counsel for the plaintiffs in the case of *Rodriguez v. City of Los Angeles*. I have personally worked with both Mr. Stormer and Ms. Richardson, and know the quality of their work to be outstanding. I am also well aware of Ms. Richardson's stellar reputation, and of Mr. Stormer's expertise and skills as one of Los Angeles' most prominent civil rights litigators.

6. I have also worked personally with Mr. Orange. For the past eleven years he and I have taught trial advocacy together as invited faculty for Harvard Law School's full credit clinical trial advocacy course. Mr. Orange and I also co-counseled on a civil rights case involving political speech during public events. I know Mr. Orange to be a phenomenally talented advocate. Moreover, he enjoys an excellent reputation among some of the finest practitioners in the nation.

7. I believe that each of them is of the highest caliber in the Los Angeles civil rights community, and that together they constitute an extraordinary legal team worthy of a multiplier for the reasons set forth herein.

8. I am familiar with this case, *Rodriguez v. City of Los Angeles*. I am aware that Plaintiffs' complaint was styled a putative class action representing a class of alleged gang members who were served with gang injunctions that contained unconstitutional curfew provisions. I am aware that it would be extremely difficult for such highly unpopular individuals to find counsel willing to represent them in such an undertaking on a purely contingency basis.

9. I am also aware of how much more complicated Section 1983 and civil rights cases like this can be than many areas of complex business litigation for which attorneys routinely charge rates comparable to those requested here, and how much skill and effort cases such as *Rodriguez* require. I have reviewed the Orders in this case granting class certification, preliminary injunction, and the Notice to Class Members

regarding the settlement of the case. Based upon my observations, I can say with confidence that counsel in this case did an astounding job in achieving such a result, which provides for both far reaching injunctive relief in setting up a process for individuals who wish to be removed from the gang injunctions, and up to $30 million in job training and education for class members or their assignees, in addition to tattoo removal services and an agreement not to continue serving such unconstitutional curfew provisions.

10. I understand that Plaintiffs' counsel in this case are seeking compensation at the following rates for the following attorneys:

Name	Title/Year Graduation	Rate
Dan Stormer	Attorney, 1974	$1075
Anne Richardson	Attorney, 1989	$825
Olu Orange	Attorney, 1998	$765
Gladys Limon	Attorney, 2003	$625
Reem Salahi	Attorney, 2008	$525
Cindy Pánuco	Attorney, 2009	$500
Alisa Hartz, Acrivi Coromelas, Caitlin McLoon	Attorney, 2012	$375
Brian Olney	Attorney, 2013	$325
Dexter Rappleye	Attorney, 2014	$300

11. As a function of my position with my firm, I am familiar with the rates my firm bills for attorneys who perform work on cases such as anti-trust, securities fraud, and other complex federal civil litigation matters. The rates for Mr. Stormer, Mr. Orange, and Ms. Richardson are lower than the rates my firm would bill for services on complex federal civil litigation cases by skilled attorneys of the same years of graduation.

12. I believe the rates requested by Mr. Stormer, Mr. Orange, and Ms. Richardson are more than appropriate for these experienced civil rights attorneys at the peak of their careers. The rates sought for the other attorneys in their firms are well within the range of appropriate rates for civil rights attorneys in the Los Angeles community, particularly in light of the reputation and experience of their firms. I also understand that Public Counsel is seeking to recover fees for their law students at the rate of $225 an hour, and their paralegals at the rate of $195-$225, and that Hadsell Stormer & Renick is seeking to recover fees for their law students at $220 an hour, and for their paralegals in the range of $175-$250 per hour; and that Mr. Orange is seeking fees for his student legal assistants at the rate of $150. This is well within the range of fees charged for such personnel in the Los Angeles civil rights community. Moreover, I believe that based on the excellence of the result plaintiffs' counsel obtained and the enormous risk they assumed with this representation, they would be eligible for an appropriate multiplier.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed at San Francisco, California on October 11, 2016.

By
William Hake

4852-3606-4312, v. 1

DECLARATION OF BARRETT S. LITT

I, Barrett S. Litt, declare as follows:

1. I am an attorney licensed to practice law in the state of California. I make this declaration in support of Plaintiffs' Motion for Attorney's Fees in the matter of *Rodriguez v. City of Los Angeles*. It is based on my own personal knowledge, and if called as a witness, I could and would testify to the following matters.

2. Since 1984, I have been the principal or senior partner in firms that operate for the specific purpose of developing and maintaining a civil rights and public interest law practice that operates in the private sector on the basis of self-generated fee awards and other recoveries. Since January 1, 2013, I have been a partner in the law firm of Kaye, McLane, Bednarski & Litt. Between September 2010 and December 31, 2012, I was a partner in the law firm of Litt, Estuar, and Kitson (which still operates to some extent as an independent firm to complete certain old cases). From July 2004 to September 2010, I was a partner in the law firm of Litt, Estuar, Harrison, and Kitson. From 1998 to July 2004, I was the principal in the law firm of Litt & Associates, Inc. From September 1, 1991 to May 1, 1997, when my then partner left the law firm to become Deputy General Counsel for Civil Rights at the federal Department of Housing and Urban Development, I was a partner at the firm of Litt & Marquez. For the seven years prior to that, I was a partner in the firm of Litt & Stormer, Inc. Dan Stormer was my law partner in that firm, and Anne Richardson was a Public Interest Fellow there for two years.

3. I graduated from the University of California at Berkeley in 1966 and from UCLA School of Law in 1969. For the first approximately ten years of my practice, I focused primarily in the area of criminal defense at the trial and appellate levels, mostly in the federal courts. In that capacity, I handled hundreds of matters, tried many cases ranging from immigration offenses to murders, and handled numerous appeals. Since 1981, I have focused primarily on complex civil litigation in the areas of constitutional law, civil rights law, class action litigation, and complex

multi-party litigation.

4. My former firm, Litt & Stormer, received the Pro Bono Firm of the Year Award from Public Counsel in 1987 in recognition of its public interest and civil rights work. Litt & Marquez received an award from the NAACP Legal Defense Fund in July, 1992, as civil rights firm of the year in recognition of its civil rights work. I received an award from UCLA School of Law as its public interest alumnus of the year in 1995 and received a CLAY award for my work in Goldstein v. City of Long Beach et al. (along with my co-counsel in the case), described in ¶12 infra.

5. I have both spoken and written on the subject of civil rights training. I published an article entitled "Class Certification in Police/Law Enforcement Cases" in Civil Rights Litigation and Attorney's Fee Annual Handbook, Vol. 18, Ch. 3 (West Publishing 2002) and one for the National Police Accountability Project titled "Select Substantive Issues Regarding Class Action Litigation In The Jail/Prison Setting", National Police Accountability Project, October 2006. I published an article in the Los Angeles Lawyer regarding the use of minimum statutory damages under the Unruh Act, particularly actions brought under Civil Code § 52.1, to enhance the prospects for certifying class actions. See "Rights for Wrongs," Los Angeles Lawyer December 2005. In 2010, I published an article in West's Civil Rights Litigation and Attorney's Fee Annual Handbook entitled, "Obtaining Class Attorney's Fees." I am rated "A/V" by Martindale-Hubbell. I am, and have been for many years, listed in Super Lawyers Southern California in the fields of civil rights and class actions.

6. My curriculum vitae is attached as Exhibit "A" to this declaration.

7. I am considered an expert in, among other things, attorneys' fees in civil rights and class action cases. I have frequently trained attorneys regarding obtaining and properly documenting statutory attorneys' fee awards. I have filed declarations on numerous occasions expressing expert opinions on the appropriate standards for awards of attorneys' fees in civil rights cases, which have been accepted by the courts.

8. In the State Bar proceeding *In re Yagman*, I was qualified as an expert in

attorneys' fees under 42 U.S.C. § 1988 and testified in person on whether or not Mr. Yagman's fee arrangement in a police shooting case was or was not unconscionable, as the State Bar contended in that case. I also recently testified in a State Bar proceeding as an expert on civil rights practice in the context of police and jail litigation.

9. In 2007, I testified as an attorneys' fee expert in a civil rights case on behalf of plaintiffs represented by a major law firm in Los Angeles. The case had a confidential settlement, with the fees to be arbitrated by a former superior court judge now at JAMS. Because the settlement and arbitration were confidential, I do not feel at liberty to identify the issues, parties, firms, or retired judge involved. However, there was a defense fee expert in that case who described me as "a prominent Los Angeles civil rights litigator experienced in fee issues arising from public interest litigation," and the arbitrator described my testimony as "credible and reliable," and described me as having "had a wide exposure to fees at a number of major firms in Los Angeles doing complex civil litigation."

10. I have also on occasion represented other attorneys in their fee litigation seeking statutory attorneys' fees.

11. I litigate a wide range of civil rights cases, including police and jail abuse, wrongful conviction, housing and employment and other discrimination, and violation of a wide range of constitutional rights. My current emphases are civil rights class actions and wrongful convictions cases. I am currently lead or co-lead counsel in pending civil rights class actions in the Los Angeles area and in other jurisdictions, including Washington D.C., Maryland and Georgia.

12. As I mentioned, my full curriculum vitae is attached. To give some sense of my experience, I mention here the largest resolved civil rights cases in which I have been the, or one of the, lead counsel:

a. *Williams v. Block*, Case No. CV97-03826 CW (C.D. Cal.) and related cases (a series of county jail over-detention and strip search

cases, settled for $27 Million and a complete revamp of jail procedure);

b. *McClure v. City of Long Beach* (fair housing case against City of Long Beach for preventing six group homes for the handicapped from opening; jury verdict before remittitur of $22.5 Million (exclusive of attorney's fees) rendered Aug. 4, 2004; case recently settled for $20 Million);

c. *Craft v. County of San Bernardino*, EDCV05-0359 SGL (C.D. Calif.) (reported at 2008 U.S. Dist. LEXIS 27526) (certified class action against the Sheriff of San Bernardino County for blanket strip searches of detainees, arrestees, and persons ordered released from custody; partial summary judgment decided for plaintiffs; $25.5 Million settlement plus injunctive relief in 2008);

d. *MIWON v. City of Los Angeles*, Case No.: CV07-3072 AHM (FMMx) (class action on behalf of demonstrators attacked by LAPD in MacArthur Park on May 1, 2007; settled in 2009 for $12.75 Million plus injunctive relief);

e. *Bynum v. District of Columbia*, Case No. 02-956 (RCL) (D.D.C.) (certified class action against the District of Columbia for overdetentions and strip searches of persons ordered released from custody, settled for $12 Million in 2006);

f. *Gamino v. County of Ventura*, Case No. CV02-9785 CBM (Ex) (C.D. Cal.) (settlement for putative class fund of approximately $12 Million for persons arrested on possession of drugs and strip searched);

g. *Goldstein v. City of Long Beach, et al.*, Case No. CV04-9692 AHM (Ex) (C.D. Cal.) (wrongful conviction case against Long Beach Police Department based on violation of *Brady v. Maryland* for mar

imprisoned for 24 years; $7.95 Million settlement in August 2010);

h. *Lopez v. Youngblood*, 609 F. Supp .2d 1125 (E.D. Cal. 2009) (settlement approved for putative class fund of approximately $7 Million for inmates strip searched after becoming entitled to release, and strip searches in groups);

i. *Barnes v. District of Columbia*, Case 1:06-cv-00315-RCL 02-956 (D.D.C.) (*Bynum* follow-up certified class action against the District of Columbia for over-detentions and strip searches of persons ordered released from custody, settled for $12 Million in 2006).

13. My qualifications have been noted by various courts or opposing experts. Following are a few examples:

a. Central District Judge Consuelo Marshall, in a recent fee decision in *Rodriguez et al. v. County of Los Angeles et al.*, CV 10-6342-CBM (AJWx) (12/27/2014), found that "Barrett S. Litt, who served predominantly in a consulting role on this case, is considered one of the leading civil rights attorneys in the country" and that the requested rate "of $975 per hour for Attorney Litt is supported by his strong reputation and experience." See also Judge Marshall's comments in *Gamino v. County of Ventura*, Case No. CV02-9785 CBM (Ex) ("Mr. Litt is widely known as one of the foremost civil rights attorneys in California, having a particular expertise in civil rights class actions and other complex multi-party civil rights cases, especially law enforcement class actions").

b. Kenneth Moscaret, a well-known defense fee auditor, recently stated in a declaration where he addressed my qualifications that I had "an outstanding background and reputation in civil rights/constitutional litigation in Los Angeles," that I was "one of

the top litigators in [my] field," and that he believed that my "skill, experience, and reputation in his field are deserving of a premium rate" (although he thought a premium rate was lower than I do).

c. Magistrate Judge Carla Woehrle, in awarding attorneys' fees in *Williams v. Block*, *supra*, commented that I am "considered one of the outstanding civil rights litigators in California, with special expertise in class actions, [and] the other attorneys involved in this litigation on behalf of the class are highly regarded, experienced and capable civil rights attorneys...."

d. United States District Judge Stephen Larson, in awarding attorneys' fees in *Craft v. County of San Bernardino*, *supra*, commented that "Plaintiffs' counsel are experienced civil rights litigators who are at the top of their field of expertise – civil rights litigation with special expertise in civil rights class actions."

In a recent case in state Court, where I submitted a declaration in support of a fee motion, Judge Gregory W. Alarcon described another attorney and me as "acknowledged experts in attorney fees in class action cases . . . ." *Molina v. Lexmark International Inc.*, LA Super. Ct. No. BC339177, Order Granting Plaintiff's Motion for Attorney's Fees and Costs in the Amount of $5,772,008.07, filed Oct. 28, 2011 at 4.

14. I have been provided information by Plaintiffs' counsel explaining the novelty and complexity of issues they faced in handling this case, as follows:

a. This case challenged the constitutionality of curfew provisions in 26 gang injunctions in the City of Los Angeles. Gang members, and even alleged gang members, are among the most unpopular members of our society, who are often looked upon as causing many social ills. Accordingly, this was a very challenging case to

bring because popular sentiment in court and in a trial could be very strongly against the plaintiffs. It was a very risky case to bring on a purely contingent basis, and I am informed that many civil rights practitioners declined the opportunity to co-counsel this case with Mr. Orange.

b. The City of Los Angeles vigorously opposed this case at every stage until very recently when settlement discussions finally prevailed. The City and the individual defendants took the following steps regarding motion practice alone: opposed a motion for class certification, opposed a motion for preliminary injunction, appealed the order granting preliminary injunction and hired an appellate law firm for that appeal; opposed discovery requests seeking production of records of service and opposed a motion to compel; brought a motion for decertification of the class; brought three motions for summary judgment; and brought a motion for judgment on the pleadings. In addition, the City required that plaintiffs prepare for trial all the way through the Pretrial Conference, requiring preparation of all the final pretrial documents, exhibit list, motions in limine, and so forth. I am informed the defendants had two experts and the plaintiffs designated four experts, all of whom prepared reports and were deposed in the case. Thus, this case was litigated very extensively by the City and individual defendants. I am informed that the City's appeal of the Order granting Preliminary Injunction was fully briefed and argued before the Ninth Circuit dismissed it as moot (because the City had complied with the relief).

c. I am aware that this case was brought not only for injunctive relief, but also for damages. (Many if not most civil rights practitioners

would likely have brought this case only for injunctive relief because of the complexity of obtaining class damages.) I am aware that plaintiffs' counsel litigated hard over the issue of what damages the class members were entitled to during the motions for summary judgment and the motions in limine and opposed every effort of the defendants to cut off damages. I am aware that some of the City's arguments were successful, such as the argument against the Bane Act claim, which was dismissed, but that other arguments were reserved for trial. I have extensive experience litigating class action damages claims and know that the case law regarding damages in class actions is complex, evolving, and poses particular hurdles in obtaining class wide relief in cases in which there is no formula that can readily be applied to the class. Thus, the final relief that was crafted in the settlement agreement (described below) would likely never have been achieved were it not for the persistent work against long odds and the creative thinking of this legal team.

d. I am aware that, in addition to the traditional injunctive relief that was obtained, ending the enforcement or service of the curfew provisions in this case, plaintiffs also achieved 1) a Jobs and Education program that provides up to $30 million in benefits to members of the class over the course of 4 years, and allows class members to transfer their right to take part in that fund to other family members and with a floor that will also go to *cy pres* organizations if all of the money is not used; 2) a gang removal process that allows class members to seek to be taken off the gang injunctions in an expedited fashion and with a third party decision-maker, Magistrate Patrick Walsh, rather than the City Attorneys'

office, which is the current process; and 3) up to $600,000 in tattoo removal for class members.

e. In my view, this relief is extraordinary, especially since it far exceeds the narrow legal issues in the complaint. Obtaining a process for removal from the gang injunction, with a neutral third party willing to hold the hearings on an expedited basis, along with the offer of pro bono legal counsel for the class members, is an exceptional benefit that the plaintiffs could never have achieved at trial, and the subject of removal from the gang injunction lists was not raised in the complaint. The Jobs and Education Program, likewise, far exceeds anything the plaintiffs could have obtained at trial, includes stipends for class members who complete certain phases, allows for payments for supportive services, and allows a class member to transfer benefits to children, spouses, parents, siblings, and even cousins. Such transferability of benefits is rare in class action settlements. Thus, through the effective use of the mediation process, Plaintiffs obtained relief in many respects superior to what they could have obtained at trial.

15. As my case list demonstrates, I have been involved with, and successful in, a wide range of complex civil rights cases, and have regularly brought fee motions under numerous federal and state fee shifting provisions. I frequently provide fee declarations in support of fee applications by other attorneys in civil rights cases, which have been cited in fee orders in the Central District to support fees that are in line with those that counsel for the Plaintiffs are seeking in this case. See, e.g., *Rauda v. City of Los Angeles*, CV08-3128 CAS (PJW), Fee Order dated Dec. 20, 2010, at 10 ("With respect to the reasonableness of the fees requested, the Court finds that plaintiffs have sufficiently documented the fees requested. It further concludes, and is satisfied based on the declarations of Barrett S. Litt and Carol A. Sobel in support of

plaintiffs' motion that the hourly rates requested by plaintiffs are consistent with those in the relevant legal community for individuals having the stature of plaintiffs' counsel."); *Lauderdale v. City of Long Beach*, No. CV 08-979 ABC (JWJx), Fee Order dated Jan. 11, 2010, at 11 ("Barrett S. Litt, another experienced civil rights litigator, also testified that the rates are in line with the Southern California market, his own experience, and fee awards in similar cases. (Litt Decl. ¶¶ 26–31.)").

16. I regularly review a variety of material to keep abreast of rates charged and awarded for complex litigation in Southern California. I do this in a variety of ways, including contacting firms to provide (on either a public or confidential basis) current rate information; speaking with other attorneys familiar with complex litigation rates; and reviewing court filings regarding attorneys' fees (including both fee applications and fee awards). I have also reviewed rates reported in Court Express for bankruptcy work by California law firms for the year 2009. My review of selected billing rate information has included, at various times, review of rates from various large corporate law firms. In particular, I collect on an ongoing basis a wide variety of civil rights awards (either lodestar awards or lodestar crosschecks in civil rights class action fee awards) and class action awards in consumer cases with lodestar crosschecks, the results of which are described further on in this declaration. This has included review of rates sought and awarded to such boutique civil rights firms as my own firm(s); the ACLU; the Disability Rights Legal Center; Disability Rights Advocates; Hadsell, Stormer et al.; the Law Offices of Carol Sobel; Schonbrun, Seplow, Harris & Hoffman; and awards to various individual practitioners and other firms receiving court awarded attorney's fees. In addition, to the extent I am able, I collect information regarding commercial rates; there are periodically reported decisions addressing fee awards in commercial cases, which I periodically review.

17. The rate information on which I rely is set forth in full in Exhibit B to this Declaration, broken into three tables, described as follows:

a. Table 1: *Civil Rights Lodestar Awards/Lodestar Crosschecks*.

These are taken from reported attorney fee awards, or filed court orders, in civil rights cases where there was either a direct lodestar award or a lodestar crosscheck against a percentage of the settlement or award fee.

b. Table 2: *Consumer/Wage & Hour Class Action Lodestar Crosschecks*. This is self-explanatory, and was taken from reported cases.

c. Table 3: *Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports*. These are a firm's standard rates reported either in a court filing, referred to in a court decision, provided to counsel, or contained in the 2009 Court Express summary of bankruptcy filings referred to previously.

18. Exhibit B contains three cuts of the same information, each containing three tables, organized and designated as follows: 1) organized by case (essentially initially recording cases into an ongoing Excel spreadsheet); 2) organized by years of graduation, most to least; and 3) organized by rates, highest to lowest (based on the adjusted rate for the year 2014, which concept is described below). I draw on this rate information in addressing the reasonableness of the rates requested in the Plaintiffs' motion, and include what I consider the most relevant references in the body of this Declaration.

19. All of the rates sought in this case are well within the rates charged by attorneys of comparable experience in the Southern California area for complex civil rights work. Below I address the rates sought in this case, and compare them to attorneys of comparable or lesser experience, skill and reputation seeking or charging comparable or lesser rates. In the charts that I attach as Exhibit B, and incorporate as relevant into the body of this Declaration, I provide the following information:

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Term	Description
Attorney	The name of the attorney awarded the rate listed or, for the commercial firms, their normal rates (or indicate if the individual identity is unknown)
Firm	The firm listed
Practice Years	The years in practice at the time of the award or, if it could be clearly determined from the opinion or other available information, the years in practice when the fee application was made. In parentheses are the years of law school graduation
Rate	The rate awarded in the case of awards, or normally charged for commercial firms
Year	The year of the award or the year of the fee application if those rates were used.
Adjusted Rate	An adjustment to the fee award to compensate for the passage of time, the basis for which is described in ¶¶ 22-25 below.

20. The name of the case in which the fee was awarded or, for commercial rates (where applicable) filed for, is noted by the use of a superscript number next to the name of the attorney. At the bottom of the charts in Exhibit B (and incorporated as relevant if the reference is used in the body of this Declaration), the name and case number, and/or Westlaw cite of the case is listed if the source is from a public filing. If the source is not from a public filing, the non-public source is identified and/or attached. Cases not in Westlaw, documents from a case file, and non-public documents that are relied upon are (with the exception of Court Express) that are referenced by a superscript number are attached with a designated Exhibit Number (which number matches the superscript number).[1] If the case is in Westlaw, it is not

[1] So, for example, if the superscript uses the number "81" to designate the case, then the exhibit, if attached, will be Exhibit 81.

attached.

21. The "Adjusted Rate" is an inflation adjustment so that what that rate would be in 2016, adjusted for the passage of time, based on the mean (numerical average) of the nation-wide Legal Services Component of the Consumer Price Index produced by the Bureau of Labor Statistics of the United States Department of Labor, which is reproduced by Dr. Michael Kavanaugh in his website for the "Updated Laffey Matrix." The "Updated Laffey Matrix" has been cited, and relied on, by courts in D.C.[1].

22. I used an adjustment factor of 3% per annum. I reached this number by taking the average of the Legal Services CPI for the ten years June 2007 to May 2017, which came to slightly above 1.03 per year, and which I rounded down to 1.03. See http://www.laffeymatrix.com/see.html.

23. Further, other information indicates that the 3% inflation factor is, if anything, an understatement of the increase in rates over the past several years. This is a national figure, and fees in urban large metropolitan areas will likely have risen more rapidly. Thus, for example, the Wall Street Journal reported in April 2013, that, in "the first quarter of 2013, the 50 top-grossing U.S. law firms boosted their partner rates by as much as 5.7%, billing on average between $879 and $882 an hour" and

[1] See *Salazar v. Dist. of Columbia*, 123 F. Supp. 2d 8, 13 (D.D.C. 2000); *Smith v. Dist. of Columbia*, 466 F. Supp. 2d 151, 155 (D.D.C. 2006) (the use of the updated Laffey Matrix is reasonable and consistent with previous precedent from our Court of Appeals, as well as from this Court in Salazar" and is "more accurate in that the calculation was based on increases/decreases in legal services rather than increase/decreases in the entire CPI"); *McDowell v. District of Columbia*, Civ. A. No. 00-594 (RCL), LEXSEE 2001 U.S. Dist. LEXIS 8114 (D.D.C. June 4, 2001) ("Plaintiffs may point to such evidence as an updated version of the Laffey matrix"); *Salazar v. Dist. of Columbia*, 750 F. Supp. 2d 70, 72 (D.D.C. 2011) (affirming use of the adjusted rate based on the national legal services data for monitoring work in the case, and rejecting Defendant's contention that the United States Attorney's matrix should be used instead); *Biery v. United States*,. 2016 WL 1128079 (Fed. Cir. Mar. 23, 2016) (the district court has the discretion to choose between the Adjusted Laffey Matrix and the Kavanaugh Matrix as a starting point to calculate attorneys' fees).

that, in 2012, "legal fees in general rose 4.8% and associate billing rates rose by 7.4%, according to a coming report by TyMetrix Legal Analytics, a unit of Wolters Kluwer, WKL.AE -0.57% and CEB, a research and advisory-services company. Those numbers are based on legal-spending data from more than 17,000 law firms." See "On Sale: the $1,150-Per-Hour- Lawyer", WSJ, April 9, 2013, http://www.wsj.com/articles/ SB10001424127887323820304578412692262899554. A recent 2016 article reported an average billing rate increase of 3.2%. See Deal B%k, Olson, "Higher Fees Increase Law Firm Revenues by 4.1 Percent, www.nytimes.com/2016/08/16/ business/dealbook/higher-fees-increase-law-firm-revenue-by-4-1-percent.html. [1]

24. I have spent the time I have validating the adjustment factor used because, in analyzing the rates, I use the adjusted rate, not the awarded or listed rate, to compare to the requested rates in the fee application. It is not a valid comparison to take a fee from five years ago, for example, for a 20 year lawyer, and compare it to a fee for a 20 year lawyer today because it does not account for the change in rates in today's legal dollars. (Nor, if it is for the same lawyer, does it take account of the fact that the lawyer is now five years more experienced than when the prior rate was awarded.)

25. **To avoid confusion, I want to be clear that the "Adjusted Rate" does not reflect an increase for the same lawyer in additional years of experience.** For example, Shawna Parks (now a 17 year lawyer) is listed twice in the chart on pages

[1] See also, e.g., "Top Law Firms Still Tops in Rates, Billable Hours", Hildebrandt Institute, January 10, 2013, 22. http://hildebrandtblog.com/2013/01/10/top-law-firms-still-tops-in-rates-billable-hours: "A survey from The National Law Journal (NLJ) (registration required) found that median partner rates were up 4.5 percent from 2011 to $517 an hour in 2012, and the median associate rate rose 3.5 percent to $323, with hourly rates ranging from $130 to $1,285 and a median hourly rate of $432. This gibes with the findings of the Major Lindsey & Africa (MLA) "Partner Compensation Survey 2012," which recorded an hourly rate range from $115 to $1,265 and an average partner billing rate of $584 (up from $555 in 2010)."

24-25 reflecting the "Adjusted Rate" for her awards as a 10 and 13 year lawyer; neither "Adjusted Rate" shows what her 17 year rate would be (which I know is higher than either of those figures), only what her awards as a 10 and 13 year attorney would be to account solely for an inflation adjustment using the awarded rates for an attorney of those years of experience

26. The years of practice for an attorney is based on either information directly provided by the source or, where it was not so provided, by checking the attorney's website or the California State Bar Member Search. (In some cases, the year of admission to the Bar may not be completely reliable because there may be reasons that an attorney's years of admission to the California State Bar are less than the years of practice. For example, admission may be delayed by the Bar's check on an attorney, or may have delayed taking the California Bar or have first practiced in a different state. Where the attorney graduated from a California law school, it is likely that s/he graduated the same year as the Bar admission.)

27. The rates being requested are for the lawyers identified in the table below, which includes their year of practice.

Attorney	Practice Years	Rate
HADSELL, STORMER & RENICK LLP		
Dan Stormer	1974 (42 years)	$1075
Anne Richardson	1989 (26 years)	$825
Gladys Límon	2003 (13 years)	$625
Reem Salahi	2008 (8 years)	$525
Cindy Pánuco	2009 (7 years)	$500
Acrivi Coromelas, Caitlin McLoon	2012 (4 years)	$375
Brian Olney	2013 (3 years)	$325

LAW OFFICES OF OLU ORANGE		
Olu Orange	1998 (18 years)	$765
PUBLIC COUNSEL		
Anne Richardson	1989 (26 years)	$825
Alisa Hartz	2012 (4 years)	$375
Dexter Rappleye	2014 (2 years)	$300

28. I address the rates sought by similarly-situated attorneys by turn.

29. I know Dan Stormer, Anne Richardson, and Olu Orange personally. I was law partners with Dan Stormer from 1984 to 1991, and he well deserves the reputation he enjoys as being among the most talented civil rights trial or appellate lawyers in the state, or, for that matter, the country. I also know Anne Richardson from the time she began her career as a Public Interest Fellow at Litt & Stormer and I have co-counselled with her since that time on a number of cases, including currently *Nozzi v. Housing Authority for the City of Los Angeles*, in which Public Counsel is my cocounsel. She is highly skilled and an excellent litigator and appellate counsel with multiple honors. I am also familiar with Olu Orange, with whom I co-counselled on *MIWON v. City of Los Angeles* (CACD Case No. CV07-3072). I know Mr. Orange to be a very talented advocate whose work has earned the highest professional honors, including selection this year as one of the Daily Journal's Top 100 Lawyers in California, a California Lawyer Attorney of the Year ("CLAY") Award last year, and recognition as a SuperLawyer for the past few years.

a. Dan Stormer (1974) – Forty-Two Years' Experience

30. Dan Stormer is a founding partner of Hadsell Stormer & Renick, and he is an attorney of 42 years, NYU class of 1974. An hourly rate of $1075.00 per hour is sought for him. This is within the range of reasonable rates for attorneys of comparable skill and experience. For example, Jose R. Allen, a 1976 lawyer at Skadden Arps, was awarded $930 in 2010 in *Californians for Disability Rights v.*

California Dep't of Transp., C 06-05125 SBA MEJ, 2010 WL 8746910 (N.D. Cal. Dec. 13, 2010) *report and recommendation adopted sub nom. Californians for Disability Rights, Inc. v. California Dep't of Transp.*, C 06-5125 SBA, 2011 WL 8180376 (N.D. Cal. Feb. 2, 2011) (lodestar award in settlement of ADA case), which would amount to an adjusted rate of approximately $1110 per hour. Mr. Allen was also recently awarded $1150 in *Willits v. City of Los Angeles*, Case No.CV 10-5782 CBM (RZx) (ECF No. 418) (C.D. Cal. Aug. 25, 2016). As these awards for Mr. Allen reflect, awards for lawyers from large firms who received civil rights fee awards demonstrate that the rates for such attorneys are significantly higher in adjusted dollars than those sought here when factoring in years of experience. Thus, Mr. Allen has two years less experience than Mr. Stormer and was recently awarded $75 more than Mr. Stormer is requesting.

31. Below I list other awards or rates at similar amounts. While in statutory fee award cases, there are only a few awards at comparable rates, they are common in commercial cases, as the Table 3 rates reflect. As I mentioned above, I rely on the adjusted rate in order to compare apples to apples. I supply these in the different tables previously described – civil rights awards, consumer class actions lodestar crosschecks, and commercial rates, as appropriate.

32. The commercial rates I have collected for complex litigation are taken from Table 3 of Exhibit B. Table 3 shows attorneys in commercial cases of comparable or lesser experience commanding fees (again, based on adjusted dollars), many substantially higher than those requested here. It is well established that civil rights rates were intended by Congress to be comparable to complex commercial litigation such as antitrust. *See, e.g.*, *Craft v. Cnty. of San Bernardino*, 624 F. Supp. 2d 1113, 1122-23 (C.D. Cal. 2008) ("declarations establish that the hourly rates set are similar to those for attorneys of comparable skill and experience at the rates paid for complex federal litigation, which was Congress' intent for civil rights cases. *See City of Riverside v. Rivera*, 477 U.S. 561, 575-576, 106 S.Ct. 2686, 91 L.Ed.2d 466 (1986)

(quoting Senate Report, at 6, U.S. Code Cong. & Admin. News 1976, p. 5913, supra, ("Congress intended civil rights fees to be comparable to that for 'other types of equally complex Federal litigation, such as antitrust cases')"). There is nothing to suggest that the legal work involved in the rates referenced in Table 3 is more complex than a complex civil rights case.

33. Because it would consume an undue amount of space to list the cases, rate sources etc. relied upon in the body of this Declaration, I do not list them in the Declaration for any of the tables. Pages 16-21 of Exhibit B contain the full name of each reference used, and the source referred to, by superscript number. (For example, using the reference from Table 1 to Larry Paradis, superscript #13 refers to the Fee award in *Communities Actively Living Independent and Free v. City of Los Angeles*, 2:090cv-00287 CBM-RZ-Doc # 255 (C.D. Cal. 6/10/13) (lodestar award in settlement of ADA injunctive relief class action), the citation to which may be found at page 17 of Exhibit B.)

Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks

Atty	Firm	Practice Yrs |Grad Yr|	Rate	Year	Adjusted Rate
Ian Herzog[24]	Law Office of Ian Herzog	44 (1967)	$1,000	2011	$1,172.84
Jose R. Allen[35]	Skadden, Arps	31 (1985)	$1150	2016	$1,150
Jose R. Allen[4]	Skadden Arps	34 (1976)	$930	2010	$1,126.08
Barrett S. Litt[34]	Kaye, McLane, Bednarski & Litt	45 (1969	$975	2014	$1,039.20
Unnamed[10]	Rosen Bien & Galvan	48 (1962)	$800	2010	$1,032.46
Sid Wolinsky[4]	DRA*	49 (1961)	$835	2010	$1,011.05
Barrett S. Litt[6]	Litt, Estuar & Kitson	40 (1969)	$800	2009	$1,000.06

Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Paul R. Fine[24]	Daniels, Fine, Israel, Schonbuch & Lebovits	39 (1972)	$850	2011	$996.92
Barrett S. Litt[15]	Litt, Estuar & Kitson	39 (1969)	$750	2008	$967.93
Barrett S. Litt[7]	Litt, Estuar & Kitson	38 (1969)	$725	2007	$965.98

Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Thomas J. Nolan[82]	Skadden Arps	40 (1971)	$1095	2011	$1,284.26
Daniel Perry[93]	Milbank, Tweed	14 (2000)	$1135	2014	$1,209.74
Jason D. Russell[82]	Skadden Arps	18 (1993)	$1030	2011	$1,208.03
Unnamed[92]	Davis, Polk & Wardwell	23 (1986)	$960	2009	$1,200.07
Unnamed[92]	Davis, Polk & Wardwell	19 (1990)	$955	2009	$1,193.82
Marc Becker[81]	Quinn Emanuel	24 (1988)	$1035	2012	$1,175.80
Unnamed[91]	Paul Hastings	36 (1974)	$940	2010	$1,138.19
Wayne Barsky[86]	Gibson Dunn	26 (1983)	$905	2009	$1,131.32
Unnamed[85]	Paul Hastings	33 (1978)	$940	2011	$1,102.47
Gordon Kirscher[90]	O'Melveny &Myers	38 (1971)	$860	2009	$1,075.06
Unnamed[92]	O'Melveny & Myers	34 (1975)	$860	2009	$1,075.06
Katherine J. Galston[89]	Irell & Manella	05 (2003)	$490	2008	$1,075.06
Unnamed[92]	Klee, Tuchin, Bogdanoff, &	19 (1990)	$850	2009	$1,062.56

Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
	Stern				
Daniel Kolkey[86]	Gibson Dunn	32 (1977)	$840	2009	$1,050.06
Arturo Gonzalez[83]	MoFo	28 (1985)	$950	2013	$1,045.36
Unnamed[84]	Lieff Cabraser	42 (1970)	$900	2012	$1,022.43
Unnamed[84]	Lieff Cabraser	38 (1974)	$900	2012	$1,022.43
Unnamed[11]	Arnold & Porter	39 (1974)	$910	2013	$1,001.35
Brian J. Hennigan[89]	Irell & Manella	25 (1983)	$775	2008	$1,000.20

b. Anne Richardson (1989) – Twenty-Six Years' Experience

34. Anne Richardson is Director of the Consumer Law Project at Public Counsel and a former partner at Hadsell Stormer Richardson & Renick. She has 26 years' experience. An hourly rate of $825.00 per hour is being requested for her. Below are fee awards for attorneys of comparable experience.

Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Robert Rubin[20]	LCCR	28 (1978)	$625	2006	$859.73
Larry Paradis[13]	DRA*	27 (1985)	$800	2012	$908.83
Matthew Righetti[19]	Righetti Glugoski	27 (1985)	$750	2012	$852.03
James de Simone[3]	Schoenbrun, de Simon	27 (1985)	$695	2012	$789.54
Ronald O. Kaye[34]	Kaye, McLane, Bednarski & Litt	26 (1988)	$775	2014	$826.03
Laurence Paradis[4]	DRA*	26 (1985)	$730	2010	$883.92

Daniel B. Kohrman[4]	AFL*****	26 (1984)	$740	2010	$896.02
Ron Elsberry[13]	DRA*	25 (1987)	$725	2012	$823.63
Robert Rubin[20]	LCCR	28 (1978)	$625	2006	$859.73
Chritopher Cox[29]	Weill Gotschall	23 (1991)	$850	2014	$905.97

34. Below are additional commercial rates for attorneys with comparable or less experience and adjusted rates significantly higher.

Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports

Atty	Firm	Practice Yrs [Grad Yr]	Rate	Year	Adjusted Rate
Arturo Gonzalez[83]	MoFo	28 (1985)	$950	2013	$1,045.36
Unnamed[92]	Pachulski, Stang	27 (1982)	$750	2009	$937.56
Wayne Barsky[86]	Gibson Dunn	26 (1983)	$905	2009	$1,131.32
Brian J. Hennigan[89]	Irell & Manella	25 (1983)	$775	2008	$1,000.20
Unnamed[92]	Gibson Dunn	25 (1974)	$790	2009	$987.56
Marc Becker[81]	Quinn Emanuel	24 (1988)	$1035	2012	$1,175.80
Unnamed[84]	Lieff Cabraser	24 (1988)	$775	2012	$880.43
Unnamed[85]	Paul Hastings	23 (1998)	$850	2011	$996.92
Christopher Cox[95]	Weil Gotshal	23 (1991)	$850	2014	$905.97
Unnamed[92]	Weil, Gotscahl	23 (1986)	$799	2009	$998.81
Unnamed[92]	Munger, Tolles	22 (1987)	$725	2009	$906.30

Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Unnamed[92]	Pachulski, Stang	22 (1987)	$725	2009	$906.30
Unnamed[84]	Lieff Cabraser	21 (1991)	$700	2012	$795.22
Marcellus McRae[86]	Gibson Dunn	21 (1988)	$785	2009	$981.31
Unnamed[92]	Munger, Tolles	21 (1988)	$600	2009	$750.04
Unnamed[92]	Pachulski, Stang	20 (1989)	$645	2009	$806.30
Mark D. Kemple[88]	Greenberg Traurig	20 (1989)	$675	2009	$871.14
Unnamed[11]	Quinn Emanuel	20	$700	2013	$770.27
Unnamed[92]	Klee, Tuchin	19 (1990)	$850	2009	$1,062.56

c. Olu Orange (1998) – Eighteen Years' Experience

35. Olu Orange is a sole practitioner at Orange Law Offices and a 1998 law graduate (18 years). The rate being requested for Mr. Orange in this matter is $765.00 per hour. As I understand, Mr. Orange was the attorney who formulated the initial theory behind this case and filed the initial complaint despite the widespread skepticism of nearly all the attorneys he consulted about co-counselling with him. While his requested rate is on the high end for attorneys of his years of experience, there are similar civil rights awards for attorneys of comparable (and in some case less) experience, and class action lodestar cross-check and commercial rates at this level are fairly common.

36. Below are tables for awarded civil rights, class action lodestar cross-check and commercial rates, again using adjusted rates for similar years of experience.

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Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Brian Dunn[36]	Cochran Firm	21 (1995)	$750	2016	$750
Michelle Uzeta[13]	DRLC***	20 (1992)	$700	2012	$795.22
Julie Nepveu[4]	AFL*****	19 (1991)	$660	2010	$799.16
Julia Sherwin[27]	Haddad & Sherwin	19 (1995)	$695	2014	$740.77
Melissa Kasnitz[4]	DRA*	18 (1992)	$650	2010	$787.05
Matthew McNicholas[17]	McNicholas & McNicholas	15 (1997)	$700	2012	$795.22
Unnamed[10]	Rosen Bien & Galvan	13 (1997)	$560	2010	$722.72
John Glugoski[19]	Righetti Glugoski	12 (1997)	$650	2012	$738.42

Table 2: Consumer/Wage & Hour Class Action Lodestar Crosschecks					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Patrick N. Keegan[53]	Keegan & Baker LLP	20 (1993)	$695	2013	$764.77
Guy Wallace[51]	Schneider Wallace	17 (1993)	$650	2010	$787.05
Jonathan Selbin[57]	Lieff Cabraser	16 [1993]	$600	2009	$750.04
Eric Gibbs[55]	Girard Gibbs	15 (1995)	$675	2010	$817.32
Eric Gibbs[56]	Girard Gibbs	15 (1995)	$675	2010	$817.32
Josh Konecky[51]	Schneider Wallace	14 (1996)	$625	2010	$756.78

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Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports

Atty	Firm	Practice Yrs [Grad Yr]	Rate	Year	Adjusted Rate
Jason D. Russell[82]	Skadden Arps	18 (1993)	$1030	2011	$1,208.03
Unnamed[92]	Gibson Dunn	18 (1991)	$610	2009	$1,193.82
Unnamed[92]	Klee, Tuchin	18 (1991)	$590	2009	$950.06
Michal H. Strub[89]	Irell & Manella	18 (1990)	$670	2008	$864.69
Unnamed[85]	Paul Hastings	17 (1994)	$725	2011	$850.31
Unnamed[92]	Morrison & Foerster	17 (1992)	$650	2009	$1,062.56
Diane Hutnyan[81]	Quinn Emanuel	15 (1997)	$790	2012	$897.47
Unnamed[85]	Paul Hastings	15 (1996)	$725	2011	$850.31
Unnamed[92]	Gibson Dunn	15 (1994)	$525	2009	$850.05
Danielle Gilmore[87]	Quinn Emanuel	15 (1993)	$685	2008	$884.05
Amy Lalley[94]	Sidley Austin	14 (1998)	$700	2012	$795.22
Unnamed[92]	Pachulski, Stang	14 (1995)	$535	2009	$843.80
Victoria Maroulis[81]	Quinn Emanuel	13 (1999)	$815	2012	$925.87
Delilah Vinzon[93]	Milbank, Tweed	12 (2002)	$900	2014	$929.16
Todd Briggs[81]	Quinn Emanuel	12 (2000)	$735	2012	$834.99
Melissa Dalziel[81]	Quinn Emanuel	12 (2000)	$730	2012	$829.31
Unnamed[85]	Paul Hastings	12 (1999)	$670	2011	$785.80
Unnamed[92]	Gibson Dunn	12 (1997)	$635	2009	$987.56
Hillary A. Hamilton[82]	Skadden Arps	10 (2001)	$710	2011	$832.72
Unnamed[91]	Paul Hastings	10 (2000)	$660	2010	$750.04
Unnamed[85]	Paul Hastings	09 (2002)	$630	2011	$738.89
Unnamed[92]	Morrison & Foerster	09 (2000)	$535	2009	$737.54
Hannah	Milbank,	08 (2006)	$800	2014	$810.05

Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Cannom[93]	Tweed				
Unnamed[85]	Paul Hastings	08 (2003)	$620	2011	$727.16

d. Gladys Limon and Reem Salahi (2003-2008) – Eight to Thirteen Years' Experience

37. Gladys Limon was an associate at Hadsell Stormer Richardson & Renick, and is a 2003 law graduate (13 years). An hourly rate of $625.00 per hour is sought by Ms. Limon. Reem Salahi was an associate at Hadsell Stormer Richardson & Renick and a 2008 law graduate (8 years). An hourly rate of $525 is sought for her.

38. The tables below again reflect civil rights awards and commercial rates. Again, the civil rights awards are comparable to those being sought, and the commercial rates are generally far higher.

Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Angela Padilla[20]	MoFo	15 (1991)	$600	2006	$825.34
Gene J. Stonebarger[31]	Stonebarger Law, APC	14 (2000)	$650	2014	$692.80
Shawna Parks[13]	DRA*	13 (1999)	$665	2012	$755.46
Unnamed[10]	Bingham, McCutcheon	13 (1997)	$655	2010	$845.33
Unnamed[10]	Rosen Bien & Galvan	13 (1997)	$560	2010	$722.72
John Glugoski[19]	Righetti Glugoski	12 (1997)	$650	2012	$738.42

Belinda Escobosa Helzer[1]	ACLU	11 (2000)	$525	2011	$615.74
Kevin LaHue[34]	Kaye, McLane, Bednarski & Litt	10 (2004)	$600	2014	$639.51
Katherine Weed[13]	DRA*	10 (2002)	$600	2012	$681.62
Joseph J. Ybarra[1]	MTO**	10 (2001)	$550	2011	$645.06
Jennifer Bezoza[4]	DRA*	10 (2000)	$570	2010	$690.18
Shawna Parks[14]	DRLC	10 (1999)	$525	2009	$656.29
Jennifer Lee[13]	DRLC***	09 (2003)	$550	2012	$624.82
Roger Heller[4]	DRA*	09 (2001)	$560	2010	$678.07

Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports

Atty	Firm	Practice Yrs [Grad Yr]	Rate	Year	Adjusted Rate
Victoria Maroulis[81]	Quinn Emanuel	13 (1999)	$815	2012	$925.87
Delilah Vinzon[93]	Milbank, Tweed	12 (2002)	$900	2014	$929.16
Todd Briggs[81]	Quinn Emanuel	12 (2000)	$735	2012	$834.99
Melissa Dalziel[81]	Quinn Emanuel	12 (2000)	$730	2012	$829.31
Unnamed[85]	Paul Hastings	12 (1999)	$670	2011	$785.80
Unnamed[92]	Klee, Tuchin,	12 (1997)	$650	2009	$812.55
Unnamed[92]	Gibson Dunn	12 (1997)	$635	2009	$793.80
Unnamed[92]	Munger, Tolles	12 (1997)	$525	2009	$656.29
Unnamed[84]	Lieff Cabraser	11 (2001)	$525	2012	$596.42
Unnamed[91]	Paul Hastings	11 (1999)	$670	2010	$811.27
Erik Swanholt[88]	Greenberg Traurig	11 (1998)	$575	2009	$742.08

Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Hillary A. Hamilton[82]	Skadden Arps	10 (2001)	$710	2011	$832.72
Unnamed[91]	Paul Hastings	10 (2000)	$660	2010	$799.16
Jorge DeNeve[90]	O'Melveny &Myers	10 (1998)	$620	2009	$775.05
Unnamed[11]	Arnold & Porter	09 (2004)	$625	2013	$687.74
Unnamed[85]	Paul Hastings	09 (2002)	$630	2011	$738.89
Unnamed[92]	Morrison & Foerster	09 (2000)	$535	2009	$668.79
Unnamed[92]	Hennigan, Bennett	09 (2000)	$505	2009	$631.29
Hannah Cannom[93]	Milbank, Tweed	08 (2006)	$800	2014	$810.05
Unnamed[85]	Paul Hastings	08 (2003)	$620	2011	$727.16
Unnamed[92]	White & Case	08 (2001)	$655	2009	$818.80

e. Cindy Panuco, Alisa Hartz, Acrivi Coromelas, Caitlin McLoon, Brian Olney, and Dexter Rappleye (2009-2014)- Two to Seven Years' Experience

39. Cindy Panuco is an Associate with Hadsell Stormer & Renick and a 2009 law graduate (7 years). An hourly rate of $500.00 per hour is requested for Ms. Panuco. Alisa Hartz is a Staff Attorney at Public Counsel and a 2012 law graduate (4 years). Acrivi Coromelas and Caitlin McLoon are also Associates at Hadsell Stormer & Renick and are also 2012 law graduates (4 years). An hourly rate of $375.00 per hour is sought for Ms. Hartz, Ms. Coromelas and Ms. McLoon. Brian Olney is an Associate at Hadsell Stormer & Renick, and a 2013 law graduate. An hourly rate of $325 is being sought for Mr. Olney. Dexter Rappleye was a UCI Fellow attorney at Public Counsel and was a 2014 graduate (2 years). An hourly rate of $300.00 per hour is sought for Mr. Rappleye. The requested rates thus range from $300 to $500.

40. The tables below again reflect civil rights awards and commercial rates. Again, the civil rights awards are comparable to those being sought, and the commercial rates are generally far higher

Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks

Atty	Firm	Practice Yrs |Grad Yr|	Rate	Year	Adjusted Rate
Richard D. Lambert[31]	Stonebarger Law	07 (2007)	$500	2014	$532.92
Mary-Lee Smith[13]	DRA*	07 (2005)	$555	2012	$630.50
Kevin Knestrick[4]	DRA*	07 (2003)	$535	2010	$647.80
Peter Bibring[2]	ACLU	07 (2002)	$375	2009	$468.78
Caitlin Weisberg[34]	Kaye, McLane, Bednarski & Litt	06 (2008)	$500	2014	$532.92
Kasey Corbit[4]	DRA*	06 (2004)	$500	2010	$605.42
Genevieve Guertin[27]	Haddad & Sherwin	05 (2009)	$400	2014	$426.34
Debra Patkin[13]	DRLC***	05 (2007)	$450	2012	$511.22
Karla Gilbride[13]	DRA*	05 (2007)	$430	2012	$488.50
Stephanie Biedermann[13]	DRA*	05 (2007)	$430	2012	$488.50
Christine Chuang[13]	DRA*	05 (2007)	$430	2012	$488.50
Laura D. Smolowe[1]	MTO**	05 (2006)	$460	2011	$539.51
Mary–Lee Kimber[4]	DRA*	05 (2005)	$475	2010	$575.15
Sheryl Wu Leung[4]	Skadden Arps	05 (2005)	$395	2010	$478.28
Matthew Strugar[14]	DRLC	05 (2004)	$400	2009	$500.03

Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Bambo Obarro[29]	Weill Gotschall	04 (2010)	$400	2014	$426.34
Gina Altomare[27]	Haddad & Sherwin	04 (2010)	$350	2014	$373.05
Heather McGunigle[22]	DRLC	04 (2009)	$375	2009	$468.78
Bethany Woodard[14]	MTO**	04 (2005)	$395	2009	$493.78
Marina A. Torres[1]	MTO**	03 (2008)	$385	2011	$451.54
Sarala V. Nagala[1]	MTO**	03 (2008)	$385	2011	$451.54
Stephanie Biedermann[4]	DRA*	03 (2007)	$350	2010	$423.80
Kristina Wilson[14]	MTO**	03 (2006)	$350	2009	$437.53
Thomas Kennedy Helm[27]	Haddad & Sherwin	02 (2012)	$325	2014	$346.40
Kara Janssen[13]	DRA*	02 (2010)	$330	2012	$374.89
Nathaniel Fisher[4]	Skadden Arps	02 (2008)	$530	2010	$641.75
Unnamed[10]	Bingham, McCutcheon	02 (2008)	$400	2010	$516.23

Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Suzanna Brickman[83]	MoFo	07 (2006)	$650	2013	$715.25
Unnamed[85]	Paul Hastings	07 (2004)	$590	2011	$691.98
Caitlin Hawks[93]	Milbank, Tweed	06 (2008)	$760	2014	$937.23

Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports

Atty	Firm	Practice Yrs [Grad Yr]	Rate	Year	Adjusted Rate
Revi-Ruth Enriquez[93]	Milbank, Tweed	06 (2008)	$760	2014	$795.22
Alex Doherty[94]	Sidley Austin	06 (2008)	$700	2014	$795.22
Unnamed[84]	Lieff Cabraser	06 (2006)	$435	2012	$494.18
Unnamed[85]	Paul Hastings	06 (2005)	$565	2011	$662.66
Unnamed[92]	Weil, Gotscahl	06 (2003)	$580	2009	$725.04
Unnamed[92]	Gibson Dunn	06 (2003)	$570	2009	$712.54
Unnamed[92]	White & Case	06 (2003)	$600	2009	$750.04
Katherine Eklund[93]	Milbank, Tweed	05 (2009)	$550	2014	$590.74
Unnamed[85]	Paul Hastings	05 (2006)	$530	2011	$621.61
Danielle Katzir[86]	Gibson Dunn	05 (2004)	$525	2009	$656.29
Katherine J. Galston[89]	Irell & Manella	05 (2003)	$490	2008	$1,075.06
Dena G. Kaplan[89]	Irell & Manella	05 (2003)	$475	2008	$613.02
Bambo Obaro[95]	Weil Gotshal	04 (2010)	$400	2014	$426.34
Alex Doherty[94]	Sidley Austin	04 (2008)	$520	2012	$590.74
Unnamed[84]	Lieff Cabraser	04 (2008)	$395	2012	$448.73
Unnamed[85]	Paul Hastings	04 (2007)	$500	2011	$586.42
Unnamed[92]	Davis, Polk	04 (2005)	$680	2009	$850.05
Unnamed[92]	Munger, Tolles	04 (2005)	$435	2009	$543.78
Unnamed[92]	Weil, Gotscahl	04 (2005)	$500	2009	$625.04
Unnamed[92]	Munger, Tolles	04 (2005)	$450	2009	$562.53
Multiple associates[86]	Gibson Dunn	04 (2005)	$495	2009	$618.79
Unnamed[92]	White & Case	04 (2004)	$600	2009	$750.04
Unnamed[92]	Munger, Tolles	04 (2004)	$395	2009	$493.78
Kimberly A.	Irell &	04 (2004)	$410	2008	$529.14

Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Svendsen[89]	Manella				
Unnamed[85]	Paul Hastings	03 (2008)	$450	2011	$527.78
Unnamed[92]	Gibson Dunn	03 (2006)	$470	2009	$587.54
Melissa Barshop[86]	Gibson Dunn	03 (2006)	$470	2009	$587.54
Unnamed[92]	O'Melveny & Myers	03 (2006)	$395	2009	$493.78
Hirad Dadgostar[88]	Greenberg Traurig	03 (2006)	$400	2008	$516.23
Unnamed[92]	Munger, Tolles	03 (2006)	$400	2009	$493.78
Multiple associates[86]	Gibson Dunn	02 (2007)	$400	2009	$500.03
Sara Brenner[87]	Quinn Emanuel	02 (2006)	$340	2008	$438.80
Lauren McCray[94]	Sidley Austin	02 (1998)	$495	2014	$527.60

41. I also understand that Public Counsel is seeking to recover fees for their law students at the rate of $225 an hour, and their paralegals at the rate of $195-$225, that Hadsell Stormer & Renick is seeking to recover fees for their law students at $220 an hour, and for their paralegals in the range of $175-$250 per hour; and that Mr. Orange is seeking fees for his student legal assistants at the rate of $150. This is well within the range of fees charged for such personnel in the Los Angeles civil rights community.

42. Because of my decades of experience and specialization in public interest and civil rights litigation, I am especially familiar with the availability and willingness of attorneys in the Southern California area to take on complex litigation challenging systemic violations of the law, especially against large cities. In fact, in the *McClure* case cited above, I was involved in prolonged litigation against the City

of Long Beach in which my clients were prevented from opening group homes for people with Alzheimer's disease. While we eventually secured a jury verdict, and subsequently settled the case for $20 million, inclusive of attorneys' fees and costs, my firm was required to invest thousands of hours over more than a decade with no assurance we would ever recover fees and costs.

43. Very few lawyers in Southern California are available or willing to undertake matters such as *McClure* or the present litigation involving the constitutionality of gang injunction provisions. I am informed that numerous attorneys declined to work on this case with plaintiffs' counsel, additional evidence of the unavailability of lawyers in the Los Angeles market willing to prosecute such a complex and unpopular case.

44. This is by far one of the most successful cases challenging gang injunction provisions that I am aware of. Many cases involving challenges to gang injunctions have been thrown out on before trial for a variety of reasons. That they prevailed, and that the settlement will provide such significant relief in terms of its Jobs and Education Program and Gang Removal Process is truly due to the innovative and indefatigable efforts of Plaintiffs' counsel.

45. Thus, it is particularly important that in a case such as this, where Plaintiffs' counsel litigated a complex and unpopular class action to a groundbreaking settlement and have advanced all costs and time during the course of the last four years without any compensation, that counsel recover their fees for time spent litigating this case to successful resolution. Indeed, in light of the complexity of the case, the novelty of many of the issues, the skill in prosecuting the case, the unpopularity of the class members, the excellent results obtained, and the uncertainty involved in a contingency matter, that counsel are entitled to a multiplier. In a somewhat comparable case, *Rodriguez v. Cty. of Los Angeles*, 96 F. Supp. 3d 1012 (C.D. Cal. 2014), which was a multi-plaintiff prisoners lawsuit against the Los Angeles County Jail and several Jail guards for brutality, Judge Marshall awarded a

multiplier of two under state law (which provides for such multipliers to reflect market compensation for the risk of loss).

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed at Pasadena, California on October 11, 2016.

Barrett S. Litt

4831-0651-6538, v. 1

Barrett S. Litt
Kaye, McLane, Bednarski & Litt, LLP
234 East Colorado Boulevard, Suite 230
Pasadena, California 91101
Telephone: (626) 844-7660
Facsimile: (626) 844-7670

Education

1966 B.A. University of California at Berkley
1969 J.D. UCLA School of Law

Honors and Awards

1987 Pro Bono Firm of the Year Award from Public Counsel (Litt & Stormer)
1992 Civil Rights Firm of the Year Award from the NAACP Legal Defense Fund (Litt & Marquez)
1995 Public Interest Alumnus of the Year Award from UCLA School of Law
2010 California Lawyer Attorney of the Year Award (CLAY)

Recent Contributions to Professional Publications

"Class Certification in Police/Law Enforcement Cases", *Civil Rights Litigation and Attorney's Fee Annual Handbook*, Vol.18, Ch.3, West Publishing 2002

"Rights for Wrongs", addressing issues under the California Civil Rights statutes, *Los Angeles Lawyer Magazine*, December 2005

"Select Substantive Issues Regarding Class Action Litigation In The Jail/Prison Setting", *National Police Accountability Project*, October 2006

"Obtaining Class Attorney's Fees," *Civil Rights Litigation and Attorney's Fee Annual Handbook*, Vol.26, West Publishing 2010

Professional

1/2013 to the present	Kaye, McLane, Bednarski & Litt, LLP
2004 to 2012	Litt, Estuar & Kitson, LLP
1997 to 2004	Litt & Associates
1991 to 1997	Litt & Marquez
1984 to 1991	Litt & Stormer

Licensed to practice in:

State of California
U.S. District Court, Central District of California
U.S. District Court, Eastern District of California
U.S. District Court, Northern District of California
Ninth Circuit Court of Appeals
Fourth Circuit Court of Appeals
Fifth Circuit Court of Appeals
Eleventh Circuit Court of Appeals
D.C. Circuit Court of Appeals
United States Supreme Court

Admitted Pro Haec Vice in:

U.S. District of Columbia
U.S. District Court, Northern District of Georgia
U.S. District Court, District of Maryland

Rated "AV" by Martindale-Hubbell

Listed in *Southern California Super Lawyers* in the fields of civil rights and class actions for the years 2005-present.

Listed in Best Lawyers in America (Los Angeles area) in the field of civil rights.

Civil Rights Class Actions – Classes Certified:

Roy v. Los Angeles County Sheriff's Department, Case No.: CV 12-9012 RGK (FFMx) (pending class action for injunctive relief and damages;(b)(2) and (b)(3) classes certified in Sept. 2016);

Nozzi v. Housing Authority of the City of Los Angeles, CV 07-00380 GW (C.D. Calif.) (class action against the Housing Authority for violations of due process and federal regulations by failing to provide proper notice of Section 8 rent increase affecting approximately 22,000 tenants; case dismissed on sj for defendants; reversed by Ninth Circuit; dismissed again; reversed second time in *Nozzi v. Hous. Auth. of City of Los Angeles*, 806 F.3d 1178 (9th Cir. 2015), *as amended on denial of reh'g and reh'g en banc* (Jan. 29, 2016; case pending).and summary judgment on liability ordered entered for Plaintiffs; on remand, (b)(2) and (b)(3) classes certified in *Nozzi v. Hous. Auth. of the City of Los Angeles,* No. CV 07-380 PA (FFMX), 2016 WL 2647677, at *1 (C.D. Cal. May 6, 2016));

Amador v. Baca, No.: 10-1649 SVW (RC) (C.D. Calif) (pending class action challenging manner of searches of women inmates in outside bus bay; estimated number of class members is 80,000-100,000; 23 (b)(2) and (b)(3) classes certified), then decertified due to changes in practice with renewed motion pending);

Williams v. Block, Case No.: CV-97-03826-CW (Central District of California) and related cases (a series of county jail overdetention and strip search cases, settled for $27 Million and a complete revamp of jail procedures);

Bynum v. District of Columbia, Case No.: 02-956 (RCL) (D.D.C.)(class action against the District of Columbia for overdetentions and blanket strip searches of persons ordered released from custody; final approval of $12,000,000 settlement occurred January 2006);

Craft v. County of San Bernardino, 468 F.Supp.2d 1172 (C.D.Cal. 2006) (certified class action against the Sheriff of San Bernardino County for blanket strip searches of detainees, arrestees, and persons ordered released from custody; partial summary judgment decided for plaintiffs; $25.5 Million settlement approved April 1, 2008);

MIWON v. City of Los Angeles, Case No.: CV 07-3072 AHM (C.D. Calif.) (class action against City of Los Angeles and others for use of police force and related conduct at MacArthur Park on May 1, 2007; final approval of class settlement for $12,800,000 settlement granted June 24, 2009, the largest class action protest settlement in the U.S.);

Barnes v. District of Columbia, Civil Action No.: 06-315 (RCL) (D.D.C.) (class action against District of Columbia for continuing to both over-detain and strip search post-release inmates despite settlement in *Bynum, supra*; class certification granted; summary judgment granted Plaintiffs on most claims; case ultimately settled for $6 Million);

Lopez v. Youngblood, No.: CV07-00474 LJO (DLBx) (E.D. Calif.) (class action against Kern County, California, for unlawful pre-arraignment and post-release strip searches and strip searches not conducted in private; class certification and summary judgment on liability granted; approximately $7 Million settlement);

Aichele et al. v. City of Los Angeles, et al. Case No.: CV 12-10863 DMG FFM (x) (C.D. Calif.) (class action for injunctive relief and damages for arrests and related actions regarding the shutdown of the use of the City Hall lawn by Occupy LA; estimated class size is 300-400; class certified; $2,675,000 settlement);

Gail Marie Harrington-Wisely, et al. v. State of California, et al., Superior Court Case No.: BC 227373 (a case involving searches of visitors to California prisons utilizing backscatter x-ray methods without reasonable suspicion; injunctive relief class certified; stipulated injunction entered; partial reversal on appeal and case returned to Superior Court for determination of attorney's fees and discrete damages claims; class decertified in light of certain liability determinations on appeal);

Ofoma v. Biggers, Case No.: 715400 (Complex Litigation Panel) (Orange County Superior Court)(family discrimination class action settled in 1996 for damages for the individual plaintiffs and the class of residents, a consent decree and an award of attorney's fees);

Francis, et al. v. California Department of Corrections, et al., Case No.: BC302856 (class action against the CDC(R) for the failure to reimburse inmates assigned to the restitution centers in Los Angeles for their obligations as ordered by the court. Case was successful in bringing about the restructuring of the CDCR's inmate accounting systems, and in the payment of restitution settlement in the amount of $325,000.)

People of the State of California v. Highland Federal Savings and Loan, Case No.: CA 718 828 (Los Angeles Superior Court)(class action filed on

behalf of the People of the State of California and a class of tenants residing in several slum buildings located in Los Angeles for financing practices encouraging and perpetuating slum conditions, settled for $3.165 million after decision in *People v. Highland*, 14 Cal.App.4th 1692, 19 Cal. Rptr. 555 (1993) established potential liability for lenders);

Hernandez v. Lee, No.: BC 084 011 (Los Angeles Superior Court)(a class action on behalf of tenants of numerous buildings for slum conditions settled in 1998 for $1,090,000);

Mould v. Investments Concept, Inc., Case No.: CA 001 201 (Los Angeles Superior Court)(race discrimination class action on behalf of a class of applicants and potential housing applicants, settled in 1992 for a total of $850,000 for the class and a comprehensive consent decree regarding the defendants' discriminatory policies and practices);

California Federation of Daycare Association v. Mission Insurance Co., Case No.: CA 000 945 (Los Angeles Superior Court)(class action on behalf of several thousand family daycare providers whose daycare insurance policies were canceled mid-term or were not renewed by Mission Insurance Company, settled in 1980's for reinstatement of policies and attorney's fees; brought at request of Public Counsel).

Pending/on Appeal Civil Rights Class Actions:

Salazar v. County of Los Angeles, No.: 15-cv-09003 (MWF) (C.D. Calif), and related cases (multiple class actions against five Southern California and four Northern California Counties on claim of illegality of Counties' receipt of "commissions" constituting the substantial portion or majority of excessive phone charges for inmates' calls with family, friends, lawyers, etc.; case in early stages; class certification not yet addressed);

McKibben v. County of San Bernardino, Case No.: EDCV 14-2171 - JGB (SPx) (pending class action for injunctive relief and damages for unequal treatment of Gay, Bisexual and Transgender jail inmates; class certification not yet filed or ruled on);

Brewster v. City of Los Angeles, Case No.: EDCV14-2257- JGB (SPx) (class action for injunctive relief and damages for 30 day impounds of cars without

a warrant; class certification motion and motion for preliminary injunction pending; case dismissed and currently on appeal);

Chua et al. v. City of Los Angeles, et al. Case No.: CV-00237-JAK-GJS(x) (C.D. Calif.) (pending class action for injunctive relief and damages for arrests and related actions regarding Ferguson related protests at 6th & Hope and Beverly & Alvarado; estimated class size is 170);

M.S. v. County of Ventura, No. 2:16-CV-03084-BRO-RAO(x) (C.D. Calif.) (recently filed class action for injunctive relief and damages for failure to provide mental health treatment to criminal defendants held in jail and found incompetent to stand trial until their mental health is restored).

Multi-party Civil Rights Cases:

Hospital and Service Employees Union, SEIU Local 399, AFL-CIO v. City of Los Angeles (Los Angeles Superior Court) (a settlement in 1993 of $2.35 million against the Los Angeles Police Department for injuries to 148 demonstrators at Century City organized by the Justice for Janitors campaign of SEIU);

Rainey v. County of Ventura, Case No.: 96 4492 LGB (C.D. Calif.)(action against County of Ventura for race discrimination on behalf of 12 police officers, settled for damages, structural relief and attorney's fees);

Lawson v. City of Los Angeles, Case No.: BC 031 232 (Los Angeles Superior Court)(lawsuit filed in 1991 on behalf of individuals who had been subjected to what plaintiffs alleged were unlawful use of force practices by the Los Angeles Police Department's Canine Unit, settled in 1995 for $3.6 million and comprehensive structural relief);

Tipton-Whittingham v. City of Los Angeles, Case No.: CV-94-3240 (TH)(C.D. Cal.)(sex discrimination and harassment suit against the Los Angeles Police Department, involving over 25 individual officers, as a result of which the Department has already completely revamped its anti-discrimination policies and procedures; damages claims settled for $4.85 Million in 2004 in addition to separate fee award of nearly $2 Million in 2000 for injunctive relief, resulting in decision in *Tipton-Whittingham v. City of Los Angeles* (2004) 34 Cal.4th 604, in which the California Supreme Court upheld catalyst fees under California law);

Hampton v. NRG (racial harassment in employment claim; jury verdict of $1,000,000 for two former employees, plus award of attorney's fees and costs; settled in mid-'90's while on appeal);

Zuniga v. Los Angeles Housing Authority, 41 Cal.App.4th 2 (1995) (holding that the Housing Authority could be held responsible for injuries to tenants after the Housing Authority was put on notice that tenants were being victimized on the premises and took no reasonable measures to prevent the injury; case settled for $1,040,000);

PIN v. HACLA, Case No.: CV-96-2810 RAP (RNBx)(action against the Housing Authority of the City of Los Angeles on behalf of several hundred present or former tenants for discrimination by failing to provide adequate security for isolated minorities in housing developments, settled in 1998 for $1.3 Million plus a comprehensive structural relief settlement agreement);

Heidy v. United States Customs Serv., 681 F.Supp. 1445 (C.D.Cal. 1988) (injunction against U.S. Customs Service for policies and practices of seizing materials from persons traveling from Nicaragua in violation of the First Amendment);

Castaneda v. Avol (Los Angeles Superior Court) (1985) (action on behalf of approximately 350 slum housing residents, settled in 1988 for a comprehensive injunction and $2.5 Million damages, plus a separate award of attorneys' fees).

Individual Civil Rights Cases: Wrongful Conviction Cases

Frank and Nicholas O'Connell v. County of Los Angeles, et al., Case No.: 13-01905-MWF (PJWx) (C.D. Cal.) (civil rights cases for police failure to turn over exculpatory information and eyewitness manipulation, resulting in murder conviction; plaintiff spent 27 years in prison before his habeas petition was granted, and he was not re-tried; suit on behalf of son as well for denial of relationship with father as result of conviction; defendants' qualified immunity appeal rejected in *Carrillo/O'Connell v. County of Los Angeles*);

Thomas Goldstein v. City of Long Beach et al., Case No.: 04-CV-9692 AHM (Ex) (C.D. Cal.) (civil rights cases for police failure to turn over exculpatory

information regarding jailhouse informant perjury and eyewitness manipulation, resulting in murder conviction; plaintiff spent 24 years in prison before his habeas petition was granted, and he was not re-tried; brought in mid-way through the case to act as lead counsel; final settlement of $7.95 Million approved by the Court; Ninth Circuit recently reversed dismissal of County/DA's Office, and case against DA settled for additional $900,000);

Bruce Lisker v. City of Los Angeles, Case No.: CV 09-9374 AHM (AJW) (C.D. Cal.) (civil rights cases for police fabrication of evidence and failure to turn over exculpatory information, resulting in murder conviction; plaintiff spent 26 years in prison before his habeas petition was granted, and he was not re-tried; 9th Circuit affirmed district court's denial of immunity on 3/20/15; petition for en banc review denied; $7.6 Million settlement).

Consulting counsel in wrongful conviction cases of *Franky Carrillo v. County of Los Angeles*, CV 11-10310-SVW(AGRx) (settled for $10.1 Million), *Obie Anthony v. City of Los Angeles,* CV 12-01332-CBM (AJWx) (settled for $8.3 Million) and *v. County of Los Angeles*, CV 13-07224-CBM (AJWx))(settled for $890,000 and reform of DA practices), and *Harold Hall v. City of Los Angeles*, C.D. Cal. No. CV 05-1977 ABC, 9th Cir. No. 10-55770 (appeal from grant of summary judgment to Defendants affirmed).

Other Individual Civil Rights Cases:

McClure v. City of Los Angeles, No.: CV-92-2776-E (C.D. Cal.)(fair housing and equal protection case against City of Long Beach and its agents for preventing six group homes for Alzheimer's victims from opening; jury verdict of $22.5 Million (reduced on remittitur to $13,826,832) plus approximately $10,000,000 in attorney's fees and costs; settled while on appeal for $20 Million);

U.S. v. Hovsepian, 359 F.3d 1144, 1147 (9th Cir. 2004)(en banc) (successful action to naturalize individuals previously convicted of conspiracy to bomb Turkish consulate in Philadelphia), aff'd en banc after remand, 422 F.3d 883 (9/6/05);

Walker v. City of Lakewood, 263 F.3d 1005 (9th Cir. 2001) (reversing district court decision dismissing fair housing organization's claim against city for

retaliation for supporting tenants suing landlord; case subsequently settled for structural relief, damages and attorneys' fees);

Tavelman v. City of Huntington Park (individual employment discrimination case against the City on behalf of a Jewish police officer who had been subjected to a campaign of religious harassment which was settled in mi-'90's for $350,000);

Ware v. Brotman Medical Center (Los Angeles Superior Court) (1993 $2.5 million jury verdict against hospital for removal of hospital privileges of black doctor; settled for $1.75 million);

Mathis v. PG&E (1991 $2 million verdict against PG&E for barring contract employee from Diablo Canyon Nuclear Power Plant; reversed by the Ninth Circuit);

Macias v. State of California (Los Angeles Superior Court) (action against the State of California and others for blinding of young man as a result of exposure to malathion spray, a portion of which was decided in *Macias v. State of California,* 10 Cal.4th 844 (1994));

Melgar v. Klee (Los Angeles Superior Court) (1988) ($1.5 million jury verdict against Los Angeles Police Department for police shooting; settled for $1.45 million).

Selected Civil Rights Decisions (from 1995 forward):

Aichele v. City of Los Angeles, 2013 WL 2445195 (C.D. Cal. June 5, 2013)

Biggs v. Best, Best & Krieger, 189 F.3d 989 (9th Cir. 1999);

Bynum v. Dist. of Columbia, 384 F.Supp.2d 342 (D.D.C. 2005);

Bynum v. District of Columbia, 412 F.Supp.2d 73 (D.D.C. 2006);

Carrillo v. Cty. of Los Angeles, 798 F.3d 1210 (9th Cir. 2015)

Craft v. Cnty. of San Bernardino, EDCV 05-359 -SGL, 2006 WL 4941829 (C.D. Cal. Mar. 23, 2006);

Craft v. County of San Bernardino, 468 F.Supp.2d 1172 (C.D.Cal. 2006);

Craft v. Cnty. of San Bernardino, 624 F. Supp. 2d 1113 (C.D. Cal. 2008);

Goldstein v. City of Long Beach, 603 F. Supp. 2d 1242 (C.D. Cal. 2009);

Goldstein v. City of Long Beach, CV 04-9692AHM, 2010 WL 3952888 (C.D. Cal. Apr. 9, 2010)

Goldstein v. City of Long Beach, 715 F.3d 750 (9th Cir. 2013)

Haynie v. Superior Court, 26 Cal.4th 1061 (Cal. S. Ct. 2001);

Jones v. Murphy, 256 F.R.D. 519 (D. Md. 2009)

Jones v. Murphy, 470 F.Supp.2d 537 (D.Md. 2007);

Jones v. Murphy, 567 F. Supp. 2d 787 (D. Md. 2008);

West v. Murphy, 771 F.3d 209 (4th Cir. 2014)

Lisker v. City of Los Angeles, CV 09-09374 AHM AJWX, 2011 WL 3420665 (C.D. Cal. Aug. 4, 2011);

Lisker v. City of Los Angeles, CV 09-09374 AHM AJWX, 2012 WL 3588560 (C.D. Cal. Aug. 20, 2012);

Lisker v. City of Los Angeles, 2:09-CV-09374-ODW, 2014 WL 293463 (C.D. Cal. Jan. 27, 2014)

Lisker v. City of Los Angeles, 780 F.3d 1237 (9th Cir. 2015)

Lopez v. Youngblood, 609 F.Supp.2d 1125 (E.D.Cal. 2009);

Lopez v. Youngblood, 2011 WL 10483569 (E.D. Cal. Sept. 2, 2011)

Macias v. State of California, 10 Cal.4th 844 (Cal. S. Ct. 1995).

Mathis v. Pacific Gas and Elec. Co., 75 F.3d 498 (9th Cir. 1996);

Multi-Ethnic Immigrant Workers Org. Network v. City of Los Angeles, 2009 WL 1065072 (C.D. Cal. Mar. 19, 2009)

Nozzi v. Hous. Auth. of City of Los Angeles, 425 F. App'x 539, 540 (9th Cir. 2011)

Nozzi v. Hous. Auth. of City of Los Angeles, 806 F.3d 1178 (9th Cir. 2015), *as amended on denial of reh'g and reh'g en banc* (Jan. 29, 2016)

Powell v. Barrett, 376 F.Supp.2d 1340 (N.D.Ga. 2005);

Powell v. Barrett, 496 F.3d 1288 (11th Cir. 8/23/07)

Powell v. Barrett, 541 F.3D 1298 (11th Cir. 2008) (en banc) [overruling a portion of the preceding panel decision; after remand to the panel, remaining issues remanded to the District Court];

Silva v. Block, 49 Cal.App.4th 345 (1996);

Streit v. County of Los Angeles, 236 F.3d 552 (9th Cir. 2001);

Tipton-Whittingham v. City of Los Angeles, 316 F.3d 1058 (9th Cir. 2003);

Tipton-Whittingham v. City of Los Angeles, 34 Cal.4th 604 (2004);

U.S. v. Hovsepian, 359 F.3d 1144 (9th Cir. 2004) (en banc);

U.S. v. Hovsepian, 422 F.3d 883 (9th Cir. 2005) (en banc);

Walker v. City of Lakewood, 272 F.3d 1114 (9th Cir. 2001);

Zuniga v. Housing Authority, 41 Cal.App.4th 82 (1995);

RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES

I. TABLE OF REPORTED ATTORNEYS' FEES – ORGANIZED BY CASE [SUPERSCRIPT REFERENCES FOUND AT CONCLUSION OF THIS SECTION BEGINNING ON PG. 16] [RATES ROUNDED DOWN TO NEAREST DOLLAR]

Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Hector O. Villagra[1]	ACLU	17 (1994)	$600	2011	$703.71
Belinda Escobosa Helzer[1]	ACLU	11 (2000)	$525	2011	$615.74
Peter Bibring[1]	ACLU	09 (2002)	$490	2011	$574.69
Paralegal[1]	ACLU		$200	2011	$234.57
Joseph J. Ybarra[1]	MTO**	10 (2001)	$550	2011	$645.06
Jacob A. Kreilkamp[1]	MTO**	08 (2003)	$505	2011	$592.29
Laura D. Smolowe[1]	MTO**	05 (2006)	$460	2011	$539.51
Marina A. Torres[1]	MTO**	03 (2008)	$385	2011	$451.54
Sarala V. Nagala[1]	MTO**	03 (2008)	$385	2011	$451.54
Paralegal[1]	MTO**		$210	2011	$246.30
ALS[1]	MTO**		$250	2011	$293.21
Carol Sobel[2]	Law Ofc Carol Sobel	31 (1978)	$710	2009	$887.55
Mark Rosenbaum[2]	ACLU	35 (1974)	$740	2009	$925.06
Peter Eliasberg[2]	ACLU	15 (1994)	$525	2009	$656.29
Peter Bibring[2]	ACLU	07 (2002)	$375	2009	$468.78
James de Simone[3]	Schoenbrun, de Simon	27 (1985)	$695	2012	$789.54

RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES

Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Michael Seplow[3]	Schoenbrun, de Simon	22 (1990)	$630	2012	$715.70
Anna Canning[3]	Schoenbrun, de Simon	06 (2006)	$450	2012	$511.22
Law student interns[3]	Schoenbrun, de Simon		$200	2012	$227.21
Sid Wolinsky[4]	DRA*	49 (1961)	$835	2010	$1,011.05
Laurence Paradis[4]	DRA*	26 (1985)	$730	2010	$883.92
Melissa Kasnitz[4]	DRA*	18 (1992)	$650	2010	$787.05
Jennifer Bezoza[4]	DRA*	10 (2000)	$570	2010	$690.18
Roger Heller[4]	DRA*	09 (2001)	$560	2010	$678.07
Kevin Knestrick[4]	DRA*	07 (2003)	$535	2010	$647.80
Kasey Corbit[4]	DRA*	06 (2004)	$500	2010	$605.42
Mary–Lee Kimber[4]	DRA*	05 (2005)	$475	2010	$575.15
Stephanie Biedermann[4]	DRA*	03 (2007)	$350	2010	$423.80
Becca von Behren[4]	DRA*	02 (2008)	$265	2010	$320.87
Senior paralegals[4]	DRA*		$265	2010	$320.87
Paralegals[4]	DRA*		$225	2010	$272.44
Summer associates[4]	DRA*		$245	2010	$296.66
Law clerks[4]	DRA*		$175	2010	$211.90
Case clerks[4]	DRA*		$165	2010	$199.79
Daniel B. Kohrman[4]	AFL*****	26 (1984)	$740	2010	$896.02
Julie Nepveu[4]	AFL*****	19 (1991)	$660	2010	$799.16
Jose R. Allen[4]	Skadden Arps	34 (1976)	$930	2010	$1,126.08
Sheryl Wu Leung[4]	Skadden Arps	05 (2005)	$395	2010	$478.28
Nathaniel Fisher[4]	Skadden Arps	02 (2008)	$530	2010	$641.75

RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES

Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Legal assistant[4]	Skadden Arps		$285	2010	$345.09
Technology manager[4]	Skadden Arps		$320	2010	$387.47
Ben Schonbrun[5]	Schonbrun, de Simone	25 (1985)	$650	2010	$762.35
Michael Seplow[5]	Schonbrun, de Simone	20 (1990)	$590	2010	$691.98
John Raphling[5]	Schonbrun, de Simone	17 (1993)	$525	2010	$615.74
Barrett S. Litt[6]	Litt, Estuar & Kitson	40 (1969)	$800	2009	$1,000.06
Carol A. Sobel[6]	Law Offices of Carol Sobel	31 (1978)	$710	2009	$887.55
Rebecca Thornton[6]	Law Offices of Carol Sobel	08 (2001)	$425	2009	$531.28
Paul L. Hoffman[6]	Schonbrun, de Simone	33 (1976)	$750	2009	$937.56
Barrett S. Litt[7]	Litt, Estuar & Kitson	38 (1969)	$725	2007	$965.98
Paul Estuar[7]	Litt, Estuar & Kitson	14 (1993)	$485	2007	$646.21
Stacey Brown[7]	Litt, Estuar & Kitson	01 (2006)	$275	2007	$366.41
Senior Paralegals[7]	Litt, Estuar & Kitson		$225	2007	$299.79
Barrett S. Litt[8]	Litt, Estuar & Kitson	43 (1969)	$850	2012	$965.63
Robert M. Kitson[8]	Litt, Estuar & Kitson	17 (1995)	$625	2012	$710.02
Bryan M. Miller[8]	Litt, Estuar & Kitson	18 (1994)	$625	2012	$710.02
Sr. paralegal[8]	Litt, Estuar & Kitson		$250	2012	$284.01
Law student interns[8]	Litt, Estuar & Kitson		$225	2012	$255.61
Dan Stormer[8]	HSKRR****	38 (1974)	$825	2012	$937.23
Michael Bien[9]	Rosen Bien Galvan & Grunfeld	28 (2008)	$640	2008	$825.97
Unnamed[10]	Prison Law Office	01 (2009)	$275	2010	$354.91
Unnamed[10]	Prison Law Office	32 (1978)	$700	2010	$903.40
Unnamed[10]	Rosen Bien & Galvan	48 (1962)	$800	2010	$1,032.46
Unnamed[10]	Rosen Bien & Galvan	13 (1997)	$560	2010	$722.72

RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES

Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Sr. paralegal[10]	Rosen Bien & Galvan		$240	2010	$309.74
Unnamed[10]	Bingham, McCutcheon	32 (1978)	$700	2010	$903.40
Unnamed[10]	Bingham, McCutcheon	02 (2008)	$400	2010	$516.23
Unnamed[10]	Bingham, McCutcheon	13 (1997)	$655	2010	$845.33
John Houston Scott[11]	Scott Law Firm	37 (1976)	$725	2013	$797.78
Thomas P. Greerty[11]	Law Offices of Thomas P. Greerty	34 (1979)	$725	2013	$797.78
Amitai Schwartz[11]	Law Offices of Amitai Schwartz	40 (1973)	$725	2013	$797.78
Moira Duvernay[11]	Law Offices of Amitai Schwartz	09 (2004)	$450	2013	$495.17
Sanford J. Rosen[12]	Rosen Bien & Galvan	46 (1962)	$700	2008	$903.40
Sid Wolinsky[13]	DRA*	51 (1961)	$860	2012	$976.99
Shawna Parks[13]	DRA*	13 (1999)	$665	2012	$755.46
Mary-Lee Smith[13]	DRA*	07 (2005)	$555	2012	$630.50
Karla Gilbride[13]	DRA*	05 (2007)	$430	2012	$488.50
Larry Paradis[13]	DRA*	27 (1985)	$800	2012	$908.83
Ron Elsberry[13]	DRA*	25 (1987)	$725	2012	$823.63
Katherine Weed[13]	DRA*	10 (2002)	$600	2012	$681.62
Stephanie Biedermann[13]	DRA*	05 (2007)	$430	2012	$488.50
Christine Chuang[13]	DRA*	05 (2007)	$430	2012	$488.50
Kara Janssen[13]	DRA*	02 (2010)	$330	2012	$374.89
Paralegal	DRA*		$240	2012	$284.01
Summer Associates[13]	DRA*		$250	2012	$272.65
Michelle Uzeta[13]	DRLC***	20 (1992)	$700	2012	$795.22
Debra Patkin[13]	DRLC***	05 (2007)	$450	2012	$511.22

RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES

Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Jennifer Lee[13]	DRLC***	09 (2003)	$550	2012	$624.82
Matthew Strugar[13]	DRLC***	08 (2004)	$525	2012	$596.42
Law Clerk[13]	DRLC***		$230	2012	$261.29
Litigation Assist[13]	DRLC***		$230	2012	$261.29
Shawna Parks[14]	DRLC	10 (1999)	$525	2009	$656.29
Sage Reeves[14]	DRLC	08 (2001)	$475	2009	$593.79
Matthew Strugar[14]	DRLC	05 (2004)	$400	2009	$500.03
Bethany Woodard[14]	MTO**	04 (2005)	$395	2009	$493.78
Kristina Wilson[14]	MTO**	03 (2006)	$350	2009	$437.53
Robert Dell Angelo[14]	MTO**	17 (1992)	$550	2009	$687.54
Law Clerks[14]	MTO**		$220	2009	$275.02
Barrett S. Litt[15]	Litt, Estuar & Kitson	39 (1969)	$750	2008	$967.93
Earnest Bell[15]	Law Offices of Earnest Bell	20 (1988)	$600	2008	$774.35
Sr. Paralegal[15]	Litt, Estuar & Kitson		$235	2008	$303.29
Dale Galipo[16]	Law Ofc of Dale Galipo	28 (1984)	$700	2012	$795.22
Humberto Guizar[16]		26 (1986)	$500	2012	$568.02
Matthew McNicholas[17]	McNicholas & McNicholas	15 (1997)	$700	2012	$795.22
Douglas D. Winter[17]	McNicholas & McNicholas	22 (1990)	$600	2012	$681.62
Catherine Schmidt[17]	McNicholas & McNicholas	11 (2001)	$500	2012	$568.02
Bill Lann Lee[18]	Lewis, Feinberg, Lee, Renaker, & Jackson	38 (1974)	$825	2012	$937.23
Matthew Righetti[19]	Righetti Glugoski	27 (1985)	$750	2012	$852.03
John Glugoski[19]	Righetti Glugoski	12 (1997)	$650	2012	$738.42

RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES

Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Angela Padilla[20]	MoFo	15 (1991)	$600	2006	$825.34
Mahogany Jenkins[20]	MoFo	02 (2004)	$285	2006	$392.03
Robert Rubin[20]	LCCR	28 (1978)	$625	2006	$859.73
Paralegal[20]	MoFo		$175	2006	$240.72
Carol Sobel[21]	Law Office of Carol Sobel	32 (1978)	$725	2010	$850.31
Rebecca Thornton[21]	Law Office of Carol Sobel	09 (2001)	$450	2010	$527.78
Heather McGunigle[22]	DRLC	04 (2009)	$375	2009	$468.78
Todd Burns[23]	Law Office of Todd Burns	18 (1996)	$650	2014	$692.80
Scott A. Brooks[24]	Daniels, Fine, Israel, Schonbuch & Lebovits	19 (1992)	$650	2011	$762.35
Paul R. Fine[24]	Daniels, Fine, Israel, Schonbuch & Lebovits	39 (1972)	$850	2011	$996.92
Craig Momita[24]	Daniels, Fine, Israel, Schonbuch & Lebovits	18 (1993)	$400	2011	$469.14
Stephen Glick[24]	Law Offices of Stephen Glick	37 (1974)	$800	2011	$938.27
Ian Herzog[24]	Law Office of Ian Herzog	44 (1967)	$1,000	2011	$1,172.84
Susan Abitanta[24]	Law Office of Ian Herzog	28 (1983)	$600	2011	$703.71
Rebecca Grey[25]		16 (1998)	$650	2014	$692.80
Dale Galipo[26]	Law Ofc Dale Galipo	23 (1989)	$675	2013	$719.45
Michael Haddad[27]	Haddad & Sherwin	23 91991)	$725	2014	$772.74
Julia Sherwin[27]	Haddad & Sherwin	19 (1995)	$695	2014	$740.77
Richard Pearl[27]		44 (1970)	$750	2014	$799.39
Genevieve Guertin[27]	Haddad & Sherwin	05 (2009)	$400	2014	$426.34
Gina Altomare[27]	Haddad & Sherwin	04 (2010)	$350	2014	$373.05

RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES

Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Thomas Kennedy Helm[27]	Haddad & Sherwin	02 (2012)	$325	2014	$346.40
Paralegals (not senior)[27]	Haddad & Sherwin		$200	2014	$213.17
Jim DeSimone[28]	Schonbrun, de Simone	28 (1985)	$725	2013	$797.78
Michael Seplow[28]	Schonbrun, de Simone	23 (1990)	$660	2013	$726.25
Douglas Ingraham[28]	Schonbrun, de Simone	15 (1998)	$575	2013	$632.72
Chritopher Cox[29]	Weill Gotschall	23 (1991)	$850	2014	$905.97
Bambo Obarro[29]	Weill Gotschall	04 (2010)	$400	2014	$426.34
Ronald K. Tellis[30]	Baron & Budd	18 (1996)	$775	2014	$826.03
Timothy G. Blood[30]	Blood Hurst and O'Reardon	24 (1990)	$695	2014	$740.77
Gene J. Stonebarger[31]	Stonebarger Law, APC	14 (2000)	$650	2014	$692.80
Richard D. Lambert[31]	Stonebarger Law	07 (2007)	$500	2014	$532.92
Dale Galipo[32]	Law Ofc Dale Galipo	30 (1984)	$800	2014	$852.68
Dale Galipo[33]	Law Ofc Dale Galipo	30 (1984)	$800	2014	$825.92
Barrett S. Litt[34]	Kaye, McLane, Bednarski & Litt	45 (1969	$975	2014	$1,039.20
Ronald O. Kaye[34]	Kaye, McLane, Bednarski & Litt	26 (1988)	$775	2014	$826.03
David M. McLane[34]	Kaye, McLane, Bednarski & Litt	28 (1988)	$775	2014	$826.03
Kevin LaHue[34]	Kaye, McLane, Bednarski & Litt	10 (2004)	$600	2014	$639.51
Caitlin Weisberg[34]	Kaye, McLane, Bednarski & Litt	06 (2008)	$500	2014	$532.92
Julia White[34] [Sr. Paralegal]	Kaye, McLane, Bednarski & Litt		$295	2014	$314.43
Heath White[34] [High Tech Paralegal]	Kaye, McLane, Bednarski & Litt		$235	2014	$250.47

RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES

Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Jose R. Allen[35]	Skadden, Arps	31 (1985)	$1150	2016	$1,150
Guy Wallace[35]	Schneider Wallace	23 (1993)	$750	2016	$750
David Borgen[35]	Goldstein Borgen Dardarian	35 (1981	$795	2016	$795
Linda Dardarian[35]	Goldstein Borgen Dardarian	29 (1987)	$775	2016	$775
Shawna Parks[35]	Law Ofc Shawna Parks	17 (1999)	$695	2016	$695
Brian Dunn[36]	Cochran Firm	21 (1995)	$795	2016	$795

Table 2: Consumer/Wage & Hour Class Action Lodestar Crosschecks					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Guy Wallace[51]	Schneider Wallace	17 (1993)	$650	2010	$787.05
Josh Konecky[51]	Schneider Wallace	14 (1996)	$625	2010	$756.78
Jonathan E. Gertler[52]	Chavez & Gertler	31 (1983)	$725	2013	$797.78
Dan L. Gildor[52]	Chavez & Gertler	12 (2002)	$550	2013	$605.21
Patrick N. Keegan[53]	Keegan & Baker LLP	20 (1993)	$695	2013	$764.77
Todd Schneider[54]	Schneider Wallace	29 (1982)	$675	2011	$791.67
Eric Gibbs[55]	Girard Gibbs	15 (1995)	$675	2010	$817.32
Dylan Hughes[55]	Girard Gibbs	10 (2000)	$545	2010	$659.91
Eric Gibbs[56]	Girard Gibbs	15 (1995)	$675	2010	$817.32
Dylan Hughes[56]	Girard Gibbs	10 (2000)	$545	2010	$787.05
Jonathan Selbin[57]	Lieff Cabraser	16 [1993]	$600	2009	$750.04

Table 2: Consumer/Wage & Hour Class Action Lodestar Crosschecks					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Shawn Khorrami[58]	Khorrami Boucher Sumner Sanguinetti, LLP	19 (1995)	$650	2014	$692.80
Launa Adolph[58]	Khorrami Boucher Sumner Sanguinetti, LLP	11 (2003)	$495	2014	$527.60

Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Unnamed[11]	Arnold & Porter	39 (1974)	$910	2013	$1,001.35
Unnamed[11]	Arnold & Porter	09 (2004)	$625	2013	$687.74
Unnamed[11]	Quinn Emanuel		$821	2013	$903.41
Unnamed[11]	Quinn Emanuel		$448	2013	$492.97
Unnamed[11]	Quinn Emanuel	20	$700	2013	$770.27
Diane Hutnyan[81]	Quinn Emanuel	15 (1997)	$790	2012	$897.47
Victoria Maroulis[81]	Quinn Emanuel	13 (1999)	$815	2012	$925.87
Todd Briggs[81]	Quinn Emanuel	12 (2000)	$735	2012	$834.99
Marc Becker[81]	Quinn Emanuel	24 (1988)	$1035	2012	$1,175.80
Melissa Dalziel[81]	Quinn Emanuel	12 (2000)	$730	2012	$829.31
Thomas J. Nolan[82]	Skadden Arps	40 (1971)	$1095	2011	$1,284.26
Jason D. Russell[82]	Skadden Arps	18 (1993)	$1030	2011	$1,208.03
Hillary A. Hamilton[82]	Skadden Arps	10 (2001)	$710	2011	$832.72
Legal Assistant[82]	Skadden Arps		$295	2011	$345.99

Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Arturo Gonzalez[83]	MoFo	28 (1985)	$950	2013	$1,045.36
Suzanna Brickman[83]	MoFo	07 (2006)	$650	2013	$715.25
Unnamed[84]	Lieff Cabraser	01 (2011)	$325	2012	$369.21
Unnamed[84]	Lieff Cabraser	04 (2008)	$395	2012	$448.73
Unnamed[84]	Lieff Cabraser	06 (2006)	$435	2012	$494.18
Unnamed[84]	Lieff Cabraser	11 (2001)	$525	2012	$596.42
Unnamed[84]	Lieff Cabraser	14 (1998)	$585	2012	$664.58
Unnamed[84]	Lieff Cabraser	17 (1995)	$650	2012	$738.42
Unnamed[84]	Lieff Cabraser	21 (1991)	$700	2012	$795.22
Unnamed[84]	Lieff Cabraser	24 (1988)	$775	2012	$880.43
Unnamed[84]	Lieff Cabraser	29 (1983)	$775	2012	$880.43
Unnamed[84]	Lieff Cabraser	34 (1978)	$800	2012	$908.83
Unnamed[84]	Lieff Cabraser	38 (1974)	$900	2012	$1,022.43
Unnamed[84]	Lieff Cabraser	42 (1970)	$900	2012	$1,022.43
Unnamed[85]	Paul Hastings	01 (2010)	$360	2011	$422.22
Unnamed[85]	Paul Hastings	03 (2008)	$450	2011	$527.78
Unnamed[85]	Paul Hastings	04 (2007)	$500	2011	$586.42
Unnamed[85]	Paul Hastings	05 (2006)	$530	2011	$621.61
Unnamed[85]	Paul Hastings	06 (2005)	$565	2011	$662.66
Unnamed[85]	Paul Hastings	07 (2004)	$590	2011	$691.98
Unnamed[85]	Paul Hastings	08 (2003)	$620	2011	$727.16
Unnamed[85]	Paul Hastings	09 (2002)	$630	2011	$738.89
Unnamed[85]	Paul Hastings	12 (1999)	$670	2011	$785.80

Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Unnamed[85]	Paul Hastings	15 (1996)	$725	2011	$850.31
Unnamed[85]	Paul Hastings	17 (1994)	$725	2011	$850.31
Unnamed[85]	Paul Hastings	23 (1998)	$850	2011	$996.92
Unnamed[85]	Paul Hastings	33 (1978)	$940	2011	$1,102.47
Wayne Barsky[86]	Gibson Dunn	26 (1983)	$905	2009	$1,131.32
Marcellus McRae[86]	Gibson Dunn	21 (1988)	$785	2009	$981.31
Daniel Kolkey[86]	Gibson Dunn	32 (1977)	$840	2009	$1,050.06
Danielle Katzir[86]	Gibson Dunn	05 (2004)	$525	2009	$656.29
Multiple associates[86]	Gibson Dunn	04 (2005)	$495	2009	$618.79
Melissa Barshop[86]	Gibson Dunn	03 (2006)	$470	2009	$587.54
Multiple associates[86]	Gibson Dunn	02 (2007)	$400	2009	$500.03
Multiple associates[86]	Gibson Dunn	01 (2008)	$345	2009	$431.28
Paralegal[86]	Gibson Dunn		$300	2009	$375.02
Paralegal[86]	Gibson Dunn		$295	2009	$368.77
Paralegal[86]	Gibson Dunn		$315	2009	$393.77
Danielle Gilmore[87]	Quinn Emanuel	15 (1993)	$685	2008	$884.05
Sara Brenner[87]	Quinn Emanuel	02 (2006)	$340	2008	$438.80
Paralegal[87]	Quinn Emanuel		$235	2008	$303.29
Mark D. Kemple[88]	Greenberg Traurig	20 (1989)	$675	2009	$871.14
Erik Swanholt[88]	Greenberg Traurig	11 (1998)	$575	2009	$742.08
Hirad Dadgostar[88]	Greenberg Traurig	03 (2006)	$400	2008	$516.23
Brian J. Hennigan[89]	Irell & Manella	25 (1983)	$775	2008	$1,000.20
Michal H. Strub[89]	Irell & Manella	18 (1990)	$670	2008	$864.69

Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Kimberly A. Svendsen[89]	Irell & Manella	04 (2004)	$410	2008	$529.14
Dena G. Kaplan[89]	Irell & Manella	05 (2003)	$475	2008	$613.02
Katherine J. Galston[89]	Irell & Manella	05 (2003)	$490	2008	$1,075.06
Paralegal[89]	Irell & Manella		$220	2008	$962.56
Gordon Kirscher[90]	O'Melveny &Myers	38 (1971)	$860	2009	$1,075.06
Alejandro Mayorkas[90]	O'Melveny &Myers	23 (1986)	$770	2009	$962.56
Thomas M. Riordan[90]	O'Melveny &Myers	14 (1995)	$675	2009	$843.80
Jorge DeNeve[90]	O'Melveny &Myers	10 (1998)	$620	2009	$775.05
Allan Johnson[90]	O'Melveny &Myers	08 (2001)	$565	2009	$706.29
Abby Schwartz[90]	O'Melveny &Myers	03 (2006)	$450	2009	$562.53
Paralegal[90]	O'Melveny &Myers	17 (2004)	$310	2009	$387.52
Paralegal[90]	O'Melveny &Myers	05 (2004)	$225	2009	$281.27
Paralegal[90]	O'Melveny &Myers	12 (1997)	$245	2009	$306.27
Unnamed[91]	Paul Hastings	36 (1974)	$940	2010	$1,138.19
Unnamed[91]	Paul Hastings	16 (1994)	$725	2010	$877.86
Unnamed[91]	Paul Hastings	11 (1999)	$670	2010	$811.27
Unnamed[91]	Paul Hastings	10 (2000)	$660	2010	$799.16
Sr. Paralegal[91]	Paul Hastings		$330	2010	$399.58
Unnamed[92]	White & Case	04 (2004)	$600	2009	$750.04
Unnamed[92]	White & Case	06 (2003)	$600	2009	$750.04
Unnamed[92]	White & Case	08 (2001)	$655	2009	$818.80
Unnamed[92]	White & Case	24 (1985)	$750	2009	$937.56

Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Unnamed[92]	Weil, Gotscahl & Manges	01 (2008)	$355	2009	$443.78
Unnamed[92]	Weil, Gotscahl & Manges	03 (2006)	$465	2009	$581.28
Unnamed[92]	Weil, Gotscahl & Manges	04 (2005)	$500	2009	$625.04
Unnamed[92]	Weil, Gotscahl & Manges	06 (2003)	$580	2009	$725.04
Unnamed[92]	Weil, Gotscahl & Manges	23 (1986)	$799	2009	$998.81
Unnamed[92]	Pachulski, Stang et al.	14 (1995)	$535	2009	$668.79
Unnamed[92]	Pachulski, Stang et al.	20 (1989)	$645	2009	$806.30
Unnamed[92]	Pachulski, Stang et al.	22 (1987)	$725	2009	$906.30
Unnamed[92]	Pachulski, Stang et al.	24 (1985)	$675	2009	$843.80
Unnamed[92]	Pachulski, Stang et al.	27 (1982)	$750	2009	$937.56
Unnamed[92]	Pachulski, Stang et al.	32 (1977)	$650	2009	$812.55
Unnamed[92]	O'Melveny & Myers	03 (2006)	$395	2009	$493.78
Unnamed[92]	O'Melveny & Myers	34 (1975)	$860	2009	$1,075.06
Unnamed[92]	Munger, Tolles & Olson	03 (2006)	$400	2009	$500.03
Unnamed[92]	Munger, Tolles & Olson	04 (2005)	$450	2009	$562.53
Unnamed[92]	Munger, Tolles & Olson	04 (2005)	$435	2009	$543.78
Unnamed[92]	Munger, Tolles & Olson	04 (2004)	$395	2009	$493.78
Unnamed[92]	Munger, Tolles & Olson	12 (1997)	$525	2009	$656.29
Unnamed[92]	Munger, Tolles & Olson	21 (1988)	$600	2009	$750.04
Unnamed[92]	Munger, Tolles & Olson	22 (1987)	$725	2009	$906.30
Unnamed[92]	Munger, Tolles & Olson	25 (1984)	$550	2009	$687.54
Unnamed[92]	Munger, Tolles & Olson	39 (1970)	$625	2009	$781.30
Unnamed[92]	Morrison & Foerster	24 (1985)	$750	2009	$937.56

Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Unnamed[92]	Morrison & Foerster	09 (2000)	$535	2009	$668.79
Unnamed[92]	Morrison & Foerster	17 (1992)	$650	2009	$812.55
Unnamed[92]	Klee, Tuchin, Bogdanoff, & Stern	12 (1997)	$650	2009	$812.55
Unnamed[92]	Klee, Tuchin, Bogdanoff, & Stern	18 (1991)	$590	2009	$737.54
Unnamed[92]	Klee, Tuchin, Bogdanoff, & Stern	19 (1990)	$850	2009	$1,062.56
Unnamed[92]	Hennigan, Bennett & Dorman	09 (2000)	$505	2009	$631.29
Unnamed[92]	Hennigan, Bennett & Dorman	30 (1979)	$760	2009	$950.06
Unnamed[92]	Hennigan, Bennett & Dorman	31 (1978)	$680	2009	$850.05
Unnamed[92]	Gibson Dunn & Crutcher	03 (2006)	$470	2009	$587.54
Unnamed[92]	Gibson Dunn & Crutcher	06 (2003)	$570	2009	$712.54
Unnamed[92]	Gibson Dunn & Crutcher	12 (1997)	$635	2009	$793.80
Unnamed[92]	Gibson Dunn & Crutcher	15 (1994)	$525	2009	$656.29
Unnamed[92]	Gibson Dunn & Crutcher	18 (1991)	$610	2009	$762.55
Unnamed[92]	Gibson Dunn & Crutcher	25 (1974)	$790	2009	$987.56
Unnamed[92]	Davis, Polk & Wardwell	04 (2005)	$680	2009	$850.05
Unnamed[92]	Davis, Polk & Wardwell	19 (1990)	$955	2009	$1,193.82
Unnamed[92]	Davis, Polk & Wardwell	23 (1986)	$960	2009	$1,200.07

Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Daniel Perry[93]	Milbank, Tweed	14 (2000)	$1135	2014	$1,209.74
Delilah Vinzon[93]	Milbank, Tweed	12 (2002)	$900	2014	$959.26
Hannah Cannom[93]	Milbank, Tweed	08 (2006)	$800	2014	$810.05
Revi-Ruth Enriquez[93]	Milbank, Tweed	06 (2008)	$760	2014	$852.68
Caitlin Hawks[93]	Milbank, Tweed	06 (2008)	$760	2014	$810.05
Katherine Eklund[93]	Milbank, Tweed	05 (2009)	$550	2014	$586.22
Amy Lalley[94]	Sidley Austin	14 (1998)	$700	2012	$795.22
Amy Lalley[94]	Sidley Austin	16 (1998)	$825	2014	$937.23
Alex Doherty[94]	Sidley Austin	04 (2008)	$520	2012	$590.74
Alex Doherty[94]	Sidley Austin	06 (2008)	$700	2014	$746.09
Lauren McCray[94]	Sidley Austin	01 (1998)	$340	2012	$386.25
Lauren McCray[94]	Sidley Austin	02 (1998)	$495	2014	$527.60
Christopher Cox[95]	Weil Gotshal	23 (1991)	$850	2014	$905.97
Bambo Obaro[95]	Weil Gotshal	04 (2010)	$400	2014	$426.34
Jessica Mohr[95]	Weil Gotshal	01 (2013)	$300	2014	$319.75
Glenn Peterson[96]	Millstone Peterson & Watts	18 (1996)	$600	2014	$639.51

*DRA stands for Disability Rights Advocates
**MTO stands for Munger, Tolles & Olson
***DRLC stands for Disability Rights Legal Center
****HSKRR stands for Hadsell, Stormer, Keeny, Richardson & Renick
*****AFL stands for AARP Foundation Litigation

CIVIL RIGHTS LODESTAR AWARD SOURCES

[1] – *Vasquez v. Rackauckas*, SACV 09-1090 VBF, 2011 WL 1791091 (C.D. Cal. May 10, 2011) *aff'd in part, rev'd in part and remanded,* 734 F.3d 1025 (9th Cir. 2013) (lodestar award in civil rights injunctive relief class action regarding modification of state gang injunctions) (remand did not affect fee award)

[2] – *Fitzgerald v. City of Los Angeles*, CV 03-01876DDP(RZX), 2009 WL 960825 (C.D. Cal. Apr. 7, 2009) (lodestar award in civil rights Skid Row litigation)

[3] – *Charlebois v. Angels Baseball LP*, SACV 10-0853 DOC ANX, 2012 WL 2449849 (C.D. Cal. May 30, 2012) (lodestar award in settlement of ADA case)

[4] – *Californians for Disability Rights v. California Dep't of Transp.,* C 06-05125 SBA MEJ, 2010 WL 8746910 (N.D. Cal. Dec. 13, 2010) *report and recommendation adopted sub nom. Californians for Disability Rights, Inc. v. California Dep't of Transp.*, C 06-5125 SBA, 2011 WL 8180376 (N.D. Cal. Feb. 2, 2011) (lodestar award in settlement of ADA case)

[5] – *Rauda v. City of Los Angeles,* CV08-3128-CAS PJW, 2010 WL 5375958 (C.D. Cal. Dec. 20, 2010) (lodestar award in civil rights police misconduct case)

[6] – *Multi-Ethnic Immigrant Workers Org. Network v. City of Los Angeles,* CV 07-3072 AHM FMMX, 2009 WL 9100391 (C.D. Cal. June 24, 2009)) (lodestar cross-check in protest excessive force civil rights class action)

[7] – *Craft v. Cnty. Of San Bernardino,* 624 F. Supp. 2d 1113, 1122-23 (C.D. Cal. 2008) (lodestar cross-check in jail civil rights class action)

[8] – *Pierce v. Cnty. Of Orange,* 905 F. Supp. 2d 1017, 1035-39, 1049 (C.D. Cal. 2012) (lodestar award in jail ADA class action)

[9] – *L.H. v. Schwarzenegger,* 645 F. Supp. 2d 888, 893-96 (E.D. Cal. 2009) (lodestar award in settlement of prison injunctive relief class action)

[10] – *Armstrong v. Brown,* 805 F. Supp. 2d 918, 920-21 (N.D. Cal. 2011)) (lodestar award in prison class action for monitoring work)

[11] – *A.D. v. State of California Highway Patrol,* C 07-5483 SI, 2013 WL 6199577 (N.D. Cal. Nov. 27, 2013) (civil rights lodestar award for police killing) [Arnold & Porter and Quinn Emmanuel rates were described in opinion as support for awarded rates, and are contained in the commercial rates table with the attorney as)"Unnamed"]

[12] – *Prison Legal News v. Schwarzenegger,* 608 F.3d 446, 455 (9th Cir. 2010), *upholding award in Prison Legal News v. Schwarzenegger,* 561 F. Supp. 2d 1095, 1106 (N.D. Cal. 2008) (post –settlement lodestar award in prisoner First Amendment injunctive relief case)

[13] – *Communities Actively Living Independent and Free v. City of Los Angeles,* 2:090cv-00287 CBM-RZ-Doc # 255 (C.D. Cal. 6/10/13) (lodestar award in settlement of ADA injunctive relief class action) **[ATTACHED AS EXHIBIT 13]**

[14] – *Lauderdale v. City of Long Beach,* CV 08-979 ABC (JWJx) (C.D.Cal. 1/11/10) (lodestar award after settlement of ADA injunctive relief class action against jail) **[ATTACHED AS EXHIBIT 14]**

[15] – *Gamino v. County of Ventura,* CV 02-9785-CBM (Ex), Doc # 185 (C.D.Cal. 2/5/09) (lodestar cross-check in jail civil rights class action) **[ATTACHED AS EXHIBIT 15]**

[16] – *P.C. v. City of Los Angeles,* 2:090cv-06495-PLA Doc # 77 (C.D. Cal. 9/4/12) (lodestar award in civil rights suit against police for excessive force resulting in death) **[ATTACHED AS EXHIBIT 16]**

[17] – *Avila v. LAPD*, No. CV 11-01326 sjo (FMOX) (C.D.Cal. 8/2/12) (lodestar award for retaliatory termination for testifying for FLSA plaintiff) **[ATTACHED AS EXHIBIT 17]**

[18] – *Vallabhapurapu v. Burger King Corp.*, Case No. C11-00667 WHA (JSC) (N.D.Cal. 10/26/2012) (lodestar award with multiplier of 1.29 in ADA accessibility class action; opinion refers to rates used to calculate the lodestar of up to $825; Lee Dec dated 8/27/2012 sets forth the rates used to calculate the lodestar, including a rate of $825 for him) **[ATTACHED AS EXHIBIT 18]**

[19] – *Rutti v. Lojack Corp., Inc.*, SACV 06-350 DOC JCX, 2012 WL 3151077 (C.D. Cal. July 31, 2012) (FLSA lodestar crosscheck)

[20] – Fee award in *Comite De Jornaleros De Redondo Beach v. City of Redondo Beach*, CV 04-9396 CBMJTLX, 2006 WL 4081215 (C.D. Cal. Dec. 12, 2006) rev'd, 607 F.3d 1178 (9th Cir. 2010) on reh'g en banc, 657 F.3d 936 (9th Cir. 2011) and aff'd, 657 F.3d 936 (9th Cir. 2011) (civil rights case successfully challenging day laborer ordinance on First Amendment grounds)

[21] – Fee award in *Long Beach Area Peace Network v. City of Long Beach,* No. CV 04-08510 JSO (SSx) (C.D.Calif.) (Doc # 64) (civil rights case successfully challenging parade ordinance on First Amendment grounds) (rates based on personal knowledge from fee declaration filed by Mr. Litt in the case) **[ATTACHED AS EXHIBIT 21]**

[22] – 2/22/10 Fee Order in *Riverside County Dept. of Mental Health v. A.S.*, No. CV 08-00511 ABC (C.D.Calif.) (IDEA fee award) (2009 used because it is clear from the timing of the order that 2009 rates were used) **[ATTACHED AS EXHIBIT 22]**

[23] – Fee order in *Dugan v. County of Los Angeles*, 2:11-cv-08145-CAS-SHx (C.D.Cal. 3/3/14) (4th Amendment, malicious prosecution § 1983 action; background as criminal defense lawyer; no evidence of prior experience litigating civil rights cases, but knowledge of 4th Amendment law and trial experience should be reflected in the rate) **[ATTACHED AS EXHIBIT 23]**

[24] – Fee order in *Heyen v. Safeway Inc.*, B243610, 2014 WL 2154676 (Cal. Ct. App. May 23, 2014) upheld (individual wage and hour case after denial of class certification, with damages award of approximately $26,000; full hourly rate awarded to determine lodestar, then reduced due to limited success because received only 25% of overtime sought; fee award was in 2012, based on 2011 rates [since fee application was filed in 2011]).

[25] – Lodestar fee award in *Echague v. Metro. Life Ins.* Co., No. 12-CV-00640-WHO, 2014 WL 4746115, at *2 (N.D. Cal. Sept. 24, 2014) – ERISA case.

[26] – Fee award in *Contreras v. City of Los Angeles*, 2:11-CV-1480-SVW-SH, 2013 WL 1296763 (C.D. Cal. Mar. 28, 2013) – individual police case

[27] – Fee order in *Dixon v. City of Oakland*, No. C-12-05207 DMR, 2014 WL 6951260, at *8 (N.D. Cal. Dec. 8, 2014) – individual police case (1.1 multiplier awarded under Civil Code § 52.1).

[28] – Fee order in *Xue Lu v. United States*, No. CV 01-01758 CBM EX, 2014 WL 2468826, at *5 (C.D. Cal. May 23, 2014) – EAJA market rate award (available due to government's bad faith).

[29] – Fee order in *Xu v. Yamanaka*, No. 13-CV-3240 YGR, 2014 WL 3840105 (N.D. Cal. Aug. 1, 2014); award was for successful Anti-SLAPP motion; defendants voluntarily reduced rate sought by 10%

[30] – Fee order in *Aarons v. BMW of N. Am., LLC*, No. CV 11-7667 PSG CWX, 2014 WL 4090564 (C.D. Cal. Apr. 29, 2014) objections overruled, No. CV 11-7667 PSG CWX, 2014 WL 4090512 (C.D. Cal. June 20, 2014) – consumer class action in which award was court determined lodestar, not percentage of fund.

[31] – Fee order in *Morey v. Louis Vuitton N. Am., Inc., No. 11CV1517 WQH BLM,* 2014 WL 109194, at *10 (S.D. Cal. Jan. 9, 2014) – consumer class action in which award was court determined lodestar, not percentage of fund; 1.51 multiplier..

[32] – Fee order in *Sanchez v. County of San Bernardino*, 10-09384 MMM (Opx) [3/1/14] – individual police case [**ATTACHED AS EXHIBIT 32**]

[33] – Fee order in *Howard v. County of Riverside,* EDCV 12-00700 VAP (Opx) [8/27/14] – individual police case [**ATTACHED AS EXHIBIT 33**].

[34] – Fee order in *Rodriguez v. Cty. of Los Angeles*, 96 F. Supp. 3d 1012 (C.D. Cal. 2014) [12/29/2014] – multi-plaintiff prisoners for guard brutality; award primarily under California state law for Civil Code 52.1 claim, with part of award on exclusively federal claims under PLRA; multiplier of two for state fee award .

[35] – Fee Order in *Willits v. City of Los Angeles*, CV 10-5782 CBM (RZx) (8/25/16) – class action injunctive relief case under ADA, RA [**ATTACHED AS EXHIBIT 35**].

[36] – *Woods v. Fagan*, CV 14-8374-VAP (SPx) (C.D. Cal.) (9/21/16 Fee Order) [**ATTACHED AS EXHIBIT 36**].

OF THE 36 CIVIL RIGHTS CASES, 25 ARE FROM THE CENTRAL DISTRICT, 8 FROM THE NORTHERN DISTRICT, 1 FROM THE EASTERN DISTRICT, 1 FROM THE SOUTHERN DISTRICT AND 1 FROM LOS ANGELES COUNTY SUPERIOR COURT. AT LEAST THE CENTRAL AND NORTHERN DISTRICT RATES ARE COMPARABLE, AND MANY FIRMS PRACTICE IN BOTH. (FOR THIS PURPOSE, ERISA AND ANTI-SLAPP ARE INCLUDED]

CLASS ACTION LODESTAR CROSS CHECK SOURCES

[51] – *Wren v. RGIS Inventory Specialists,* C-06-05778 JCS, 2011 WL 1230826 (N.D. Cal. Apr. 1, 2011) *supplemented,* C-06-05778 JCS, 2011 WL 1838562 (N.D. Cal. May 13, 2011)

[52]– *Bolton v. U.S. Nursing Corp.*, C 12-4466 LB, 2013 WL 5700403 (N.D. Cal. Oct. 18, 2013)

[53]– *Johansson-Dohrmann v. Cbr Sys., Inc.*, 12-CV-1115-MMA BGS, 2013 WL 3864341 (S.D. Cal. July 24, 2013)

[54]– *Thieriot v. Celtic Ins. Co.*, C-10-04462-LB, 2011 WL 1522385 (N.D. Cal. Apr. 21, 2011)

[55]– *Browne v. Am. Honda Motor Co., Inc.*, CV 09-06750 MMM DTBX, 2010 WL 9499073 (C.D. Cal. Oct. 5, 2010)

[56]– *Parkinson v. Hyundai Motor Am.*, 796 F. Supp. 2d 1160, 1164-66, 1170-73 (C.D. Cal. 2010)

[57]– *Pelletz v. Weyerhaeuser Co.*, 592 F. Supp. 2d 1322, 1326-27 (W.D. Wash. 2009)

[58]– *Gonzalez v. S. Wine & Spirits of Am. Inc.*, No. 2:11-CV-05849-ODW, 2014 WL 1630674, at *2 (C.D. Cal. Apr. 24, 2014))

[58] – *G. F. v. Contra Costa Cty.*, 2015 WL 7571789, at *13 (N.D. Cal. Nov. 25, 2015)

COMMERCIAL LITIGATION SOURCES

[81] – *Apple, Inc. v. Samsung Electronics Co., Ltd.*, C 11-1846 LHK PSG, 2012 WL 5451411 (N.D. Cal. Nov. 7, 2012)). The rates listed reflect what Quinn Emmanuel indicated were its standard rates for the attorneys being billed; the court award was lower as follows: Marc Becker - $800; Diane Hutnyan - $700; Victoria Maroulis - $700; Todd Briggs - $700; Melissa Dalziel - $681. Because Mr. Becker is based in London he was marked for whether he was designated as a SuperLawyer.

[82] – Skadden Arps bill Bill to MGA Entertainment Inc. in *Mattel v. MGA Entertainment*, Case No. 04 CV 09049-DOC (C.D.Cal.), filed 7/11/1, Doc 10684-50; rates accepted without objection and ordered in Doc. 10703 (8/4/11) **[ATTACHED AS EXHIBIT 82]**

[83] – Declaration of Arturo Gonzalez in *Bullis Charter School v. Los Altos School District et al.* , Case No. 109 CV144569 (Santa Clara Sup. Ct., filed 10/19/13). Although *Bullis* is arguably a public interest case, we are presenting this as a reflection of Mr. Gonzalez's and Ms. Brickman's normal rates, which is what Mr. Gonzalez explains in his declaration. **[ATTACHED AS EXHIBIT 83]**

[84] – The Lieff Cabraser rates were provided in a 3/21/2012 email from firm partner as their standard rates for 2012; Lieff Cabraser is a contingent fee firm specializing in class actions.

[85] – Email from ACLU to Barry Litt of 7/26/11 with Paul Hastings rate information provided to ACLU by former Paul Hastings associate.

[86] – 4/9/09 Gibson Dunn partner Wayne Barsky Declaration in *Rogel v. Development Agency of City of Lynwood*, Case No. BS106592 (reflecting Gibson Dunn standard rates) **[ATTACHED AS EXHIBIT 86]**

[87] – 11/27/08 Dec. of Quinn Emmanuel partner Danielle Gilmore in *Monrovia Nursing Co. v. Rosedale*, Case No. BC 351140 (LA Sup. Ct.) (reflecting Gibson Dunn standard rates) **[ATTACHED AS EXHIBIT 87]**

[88] – 10/16/09 Fee Order for Greenberg Taurig attorneys in *Santa Fe Pointe, L.P. v. Greystone Servicing Corp.*, C-07-5454 MMC, 2009 WL 3353449 (N.D. Cal. 10/16/09) (reflecting rates billed to client)

[89] – 11/21/08 Dec. of O'Irell & Manella partner Brian Hennigan in *Monrovia Nursery Co. v. Rosedale*, No. BC351140 (Los Angeles Superior Court) (reflecting customary rates, which were billed to client in the case) (rates rounded down to the closest $5) **[ATTACHED AS EXHIBIT 89]**

[90] – 1/09/09 Bankruptcy Fee Application in *In re Three A's Holdings, L.L.C.*, No CV-04-07131- SVW (D. Del.) [bankruptcy fee application; only adversarial (litigation) rates relied on] **[ATTACHED AS EXHIBIT 90]**

[91] – 11/17/10 Declaration of James Gillian in support of fee application in *La Asociacion De Trabajadores De Lake Forest v. City of Lake Forest*, CA 9 Case #09-55215 (Dkt. # 43-7) **[ATTACHED AS EXHIBIT 91]**

[92] – Selected rates compiled from 2009 Westlaw Court Express

[93] – Milbank Tweed rates being sought for DRLC co-counsel in *LAUSD v. Michael Garcia*, Case No. 10-55879 (9th Cir.); listed in email from DRLC counsel Anna Rivera on 2/24/14 [not yet in other tables as of 2/24]

[94] – Sidley Austin rates listed in Declaration of Amy Lalley for fee motion in Jones v. Upland Housing Authority, NO.: EDCV 12-2074 VAP (Opx) (Dkt. # 46 2/24/14) **[ATTACHED AS EXHIBIT 94]**

[95] – Fee award in anti-SLAPP motion in *Xu v. Yamanaka*, 2014 WL 3840105 (N.D. Cal. Aug. 1, 2014)

[96] – *Altavion, Inc. v. Konica Minolta Sys. Lab. Inc.*, 226 Cal. App. 4th 26, 71, 171 Cal. Rptr. 3d 714, 750 (2014), review denied (Aug. 20, 2014) [Trade secrets litigation; lodestar award]

II. RATES FROM SECTION I ORGANIZED BY YEARS OF PRACTICE

Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Sid Wolinsky[13]	DRA*	51 (1961)	$860	2012	$976.99
Sid Wolinsky[4]	DRA*	49 (1961)	$835	2010	$1,011.05
Unnamed[10]	Rosen Bien & Galvan	48 (1962)	$800	2010	$1,032.46
Sanford J. Rosen[12]	Rosen Bien & Galvan	46 (1962)	$700	2008	$903.40
Barrett S. Litt[34]	Kaye, McLane, Bednarski & Litt	45 (1969	$975	2014	$1,039.20
Richard Pearl[27]		44 (1970)	$750	2014	$799.39
Ian Herzog[24]	Law Office of Ian Herzog	44 (1967)	$1,000	2011	$1,172.84
Barrett S. Litt[8]	Litt, Estuar & Kitson	43 (1969)	$850	2012	$965.63
Amitai Schwartz[11]	Law Offices of Amitai Schwartz	40 (1973)	$725	2013	$797.78
Barrett S. Litt[6]	Litt, Estuar & Kitson	40 (1969)	$800	2009	$1,000.06
Paul R. Fine[24]	Daniels, Fine, Israel, Schonbuch & Lebovits	39 (1972)	$850	2011	$996.92
Barrett S. Litt[15]	Litt, Estuar & Kitson	39 (1969)	$750	2008	$967.93
Dan Stormer[8]	HSKRR****	38 (1974)	$825	2012	$937.23
Bill Lann Lee[18]	Lewis, Feinberg, Lee, Renaker, & Jackson	38 (1974)	$825	2012	$937.23
Barrett S. Litt[7]	Litt, Estuar & Kitson	38 (1969)	$725	2007	$965.98
John Houston Scott[11]	Scott Law Firm	37 (1976)	$725	2013	$797.78
Stephen Glick[24]	Law Offices of Stephen Glick	37 (1974)	$800	2011	$938.27
David Borgen[35]	Goldstein Borgen Dardarian	35 (1981	$795	2016	$795
Mark Rosenbaum[2]	ACLU	35 (1974)	$740	2009	$925.06

RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES

Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Thomas P. Greerty[11]	Law Offices of Thomas P. Greerty	34 (1979)	$725	2013	$797.78
Jose R. Allen[4]	Skadden Arps	34 (1976)	$930	2010	$1,126.08
Paul L. Hoffman[6]	Schonbrun, de Simone	33 (1976)	$750	2009	$937.56
Unnamed[10]	Prison Law Office	32 (1978)	$700	2010	$903.40
Unnamed[10]	Bingham, McCutcheon	32 (1978)	$700	2010	$903.40
Carol Sobel[21]	Law Office of Carol Sobel	32 (1978)	$725	2010	$850.31
Jose R. Allen[35]	Skadden, Arps	31 (1985)	$1150	2016	$1,150
Carol Sobel[2]	Law Ofc Carol Sobel	31 (1978)	$710	2009	$887.55
Carol A. Sobel[6]	Law Offices of Carol Sobel	31 (1978)	$710	2009	$887.55
Dale Galipo[32]	Law Ofc Dale Galipo	30 (1984)	$800	2014	$852.68
Dale Galipo[33]	Law Ofc Dale Galipo	30 (1984)	$800	2014	$825.92
Linda Dardarian[35]	Goldstein Borgen Dardarian	29 (1987)	$775	2016	$775
Michael Bien[9]	Rosen Bien Galvan & Grunfeld	28 (2008)	$640	2008	$825.97
David M. McLane[34]	Kaye, McLane, Bednarski & Litt	28 (1988)	$775	2014	$826.03
Jim DeSimone[28]	Schonbrun, de Simone	28 (1985)	$725	2013	$797.78
Dale Galipo[16]	Law Ofc of Dale Galipo	28 (1984)	$700	2012	$795.22
Susan Abitanta[24]	Law Office of Ian Herzog	28 (1983)	$600	2011	$703.71
Robert Rubin[20]	LCCR	28 (1978)	$625	2006	$859.73
Larry Paradis[13]	DRA*	27 (1985)	$800	2012	$908.83
Matthew Righetti[19]	Righetti Glugoski	27 (1985)	$750	2012	$852.03
James de Simone[3]	Schoenbrun, de Simon	27 (1985)	$695	2012	$789.54
Ronald O. Kaye[34]	Kaye, McLane, Bednarski & Litt	26 (1988)	$775	2014	$826.03
Humberto Guizar[16]		26 (1986)	$500	2012	$568.02
Laurence Paradis[4]	DRA*	26 (1985)	$730	2010	$883.92

RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES

Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Daniel B. Kohrman[4]	AFL*****	26 (1984)	$740	2010	$896.02
Ron Elsberry[13]	DRA*	25 (1987)	$725	2012	$823.63
Ben Schonbrun[5]	Schonbrun, de Simone	25 (1985)	$650	2010	$762.35
Timothy G. Blood[30]	Blood Hurst and O'Reardon	24 (1990)	$695	2014	$740.77
Michael Haddad[27]	Haddad & Sherwin	23 91991)	$725	2014	$772.74
Guy Wallace[35]	Schneider Wallace	23 (1993)	$750	2016	$750
Chritopher Cox[29]	Weill Gotschall	23 (1991)	$850	2014	$905.97
Michael Seplow[28]	Schonbrun, de Simone	23 (1990)	$660	2013	$726.25
Dale Galipo[26]	Law Ofc Dale Galipo	23 (1989)	$675	2013	$719.45
Michael Seplow[3]	Schoenbrun, de Simon	22 (1990)	$630	2012	$715.70
Douglas D. Winter[17]	McNicholas & McNicholas	22 (1990)	$600	2012	$681.62
Brian Dunn[36]	Cochran Firm	21 (1995)	$795	2016	$795
Michelle Uzeta[13]	DRLC***	20 (1992)	$700	2012	$795.22
Michael Seplow[5]	Schonbrun, de Simone	20 (1990)	$590	2010	$691.98
Earnest Bell[15]	Law Offices of Earnest Bell	20 (1988)	$600	2008	$774.35
Julia Sherwin[27]	Haddad & Sherwin	19 (1995)	$695	2014	$740.77
Scott A. Brooks[24]	Daniels, Fine, Israel, Schonbuch & Lebovits	19 (1992)	$650	2011	$762.35
Julie Nepveu[4]	AFL*****	19 (1991)	$660	2010	$799.16
Ronald K. Tellis[30]	Baron & Budd	18 (1996)	$775	2014	$826.03
Todd Burns[23]	Law Office of Todd Burns	18 (1996)	$650	2014	$692.80
Bryan M. Miller[8]	Litt, Estuar & Kitson	18 (1994)	$625	2012	$710.02
Craig Momita[24]	Daniels, Fine, Israel, Schonbuch & Lebovits	18 (1993)	$400	2011	$469.14

RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES

Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Melissa Kasnitz[4]	DRA*	18 (1992)	$650	2010	$787.05
Shawna Parks[35]	Law Ofc Shawna Parks	17 (1999)	$695	2016	$695
Robert M. Kitson[8]	Litt, Estuar & Kitson	17 (1995)	$625	2012	$710.02
Hector O. Villagra[1]	ACLU	17 (1994)	$600	2011	$703.71
John Raphling[5]	Schonbrun, de Simone	17 (1993)	$525	2010	$615.74
Robert Dell Angelo[14]	MTO**	17 (1992)	$550	2009	$687.54
Rebecca Grey[25]		16 (1998)	$650	2014	$692.80
Douglas Ingraham[28]	Schonbrun, de Simone	15 (1998)	$575	2013	$632.72
Matthew McNicholas[17]	McNicholas & McNicholas	15 (1997)	$700	2012	$795.22
Peter Eliasberg[2]	ACLU	15 (1994)	$525	2009	$656.29
Angela Padilla[20]	MoFo	15 (1991)	$600	2006	$825.34
Gene J. Stonebarger[31]	Stonebarger Law, APC	14 (2000)	$650	2014	$692.80
Paul Estuar[7]	Litt, Estuar & Kitson	14 (1993)	$485	2007	$646.21
Shawna Parks[13]	DRA*	13 (1999)	$665	2012	$755.46
Unnamed[10]	Bingham, McCutcheon	13 (1997)	$655	2010	$845.33
Unnamed[10]	Rosen Bien & Galvan	13 (1997)	$560	2010	$722.72
John Glugoski[19]	Righetti Glugoski	12 (1997)	$650	2012	$738.42
Catherine Schmidt[17]	McNicholas & McNicholas	11 (2001)	$500	2012	$568.02
Belinda Escobosa Helzer[1]	ACLU	11 (2000)	$525	2011	$615.74
Kevin LaHue[34]	Kaye, McLane, Bednarski & Litt	10 (2004)	$600	2014	$639.51
Katherine Weed[13]	DRA*	10 (2002)	$600	2012	$681.62
Joseph J. Ybarra[1]	MTO**	10 (2001)	$550	2011	$645.06

RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES

Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Jennifer Bezoza[4]	DRA*	10 (2000)	$570	2010	$690.18
Shawna Parks[14]	DRLC	10 (1999)	$525	2009	$656.29
Moira Duvernay[11]	Law Offices of Amitai Schwartz	09 (2004)	$450	2013	$495.17
Jennifer Lee[13]	DRLC***	09 (2003)	$550	2012	$624.82
Peter Bibring[1]	ACLU	09 (2002)	$490	2011	$574.69
Roger Heller[4]	DRA*	09 (2001)	$560	2010	$678.07
Rebecca Thornton[21]	Law Office of Carol Sobel	09 (2001)	$450	2010	$527.78
Matthew Strugar[13]	DRLC***	08 (2004)	$525	2012	$596.42
Jacob A. Kreilkamp[1]	MTO**	08 (2003)	$505	2011	$592.29
Sage Reeves[14]	DRLC	08 (2001)	$475	2009	$593.79
Rebecca Thornton[6]	Law Offices of Carol Sobel	08 (2001)	$425	2009	$531.28
Richard D. Lambert[31]	Stonebarger Law	07 (2007)	$500	2014	$532.92
Mary-Lee Smith[13]	DRA*	07 (2005)	$555	2012	$630.50
Kevin Knestrick[4]	DRA*	07 (2003)	$535	2010	$647.80
Peter Bibring[2]	ACLU	07 (2002)	$375	2009	$468.78
Caitlin Weisberg[34]	Kaye, McLane, Bednarski & Litt	06 (2008)	$500	2014	$532.92
Anna Canning[3]	Schoenbrun, de Simon	06 (2006)	$450	2012	$511.22
Kasey Corbit[4]	DRA*	06 (2004)	$500	2010	$605.42
Genevieve Guertin[27]	Haddad & Sherwin	05 (2009)	$400	2014	$426.34
Debra Patkin[13]	DRLC***	05 (2007)	$450	2012	$511.22
Karla Gilbride[13]	DRA*	05 (2007)	$430	2012	$488.50
Stephanie Biedermann[13]	DRA*	05 (2007)	$430	2012	$488.50
Christine Chuang[13]	DRA*	05 (2007)	$430	2012	$488.50

RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES

Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Laura D. Smolowe[1]	MTO**	05 (2006)	$460	2011	$539.51
Mary–Lee Kimber[4]	DRA*	05 (2005)	$475	2010	$575.15
Sheryl Wu Leung[4]	Skadden Arps	05 (2005)	$395	2010	$478.28
Matthew Strugar[14]	DRLC	05 (2004)	$400	2009	$500.03
Bambo Obarro[29]	Weill Gotschall	04 (2010)	$400	2014	$426.34
Gina Altomare[27]	Haddad & Sherwin	04 (2010)	$350	2014	$373.05
Heather McGunigle[22]	DRLC	04 (2009)	$375	2009	$468.78
Bethany Woodard[14]	MTO**	04 (2005)	$395	2009	$493.78
Marina A. Torres[1]	MTO**	03 (2008)	$385	2011	$451.54
Sarala V. Nagala[1]	MTO**	03 (2008)	$385	2011	$451.54
Stephanie Biedermann[4]	DRA*	03 (2007)	$350	2010	$423.80
Kristina Wilson[14]	MTO**	03 (2006)	$350	2009	$437.53
Thomas Kennedy Helm[27]	Haddad & Sherwin	02 (2012)	$325	2014	$346.40
Kara Janssen[13]	DRA*	02 (2010)	$330	2012	$374.89
Nathaniel Fisher[4]	Skadden Arps	02 (2008)	$530	2010	$641.75
Unnamed[10]	Bingham, McCutcheon	02 (2008)	$400	2010	$516.23
Becca von Behren[4]	DRA*	02 (2008)	$265	2010	$320.87
Mahogany Jenkins[20]	MoFo	02 (2004)	$285	2006	$392.03
Unnamed[10]	Prison Law Office	01 (2009)	$275	2010	$354.91
Stacey Brown[7]	Litt, Estuar & Kitson	01 (2006)	$275	2007	$366.41
Technology manager[4]	Skadden Arps		$320	2010	$387.47
Legal assistant[4]	Skadden Arps		$285	2010	$345.09

RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES

Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Senior paralegals[4]	DRA*		$265	2010	$320.87
Julia White[34] [Sr. Paralegal]	Kaye, McLane, Bednarski & Litt		$295	2014	$314.43
Sr. paralegal[10]	Rosen Bien & Galvan		$240	2010	$309.74
Sr. Paralegal[15]	Litt, Estuar & Kitson		$235	2008	$303.29
Senior Paralegals[7]	Litt, Estuar & Kitson		$225	2007	$299.79
Summer associates[4]	DRA*		$245	2010	$296.66
ALS[1]	MTO**		$250	2011	$293.21
Sr. paralegal[8]	Litt, Estuar & Kitson		$250	2012	$284.01
Paralegal	DRA*		$240	2012	$284.01
Law Clerks[14]	MTO**		$220	2009	$275.02
Summer Associates[13]	DRA*		$250	2012	$272.65
Paralegals[4]	DRA*		$225	2010	$272.44
Law Clerk[13]	DRLC***		$230	2012	$261.29
Litigation Assist[13]	DRLC***		$230	2012	$261.29
Law student interns[8]	Litt, Estuar & Kitson		$225	2012	$255.61
Heath White[34] [High Tech Paralegal]	Kaye, McLane, Bednarski & Litt		$235	2014	$250.47
Paralegal[1]	MTO**		$210	2011	$246.30
Paralegal[20]	MoFo		$175	2006	$240.72
Paralegal[1]	ACLU		$200	2011	$234.57
Law student interns[3]	Schoenbrun, de Simon		$200	2012	$227.21
Paralegals (not senior)[27]	Haddad & Sherwin		$200	2014	$213.17

RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES

Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Law clerks[4]	DRA*		$175	2010	$211.90
Case clerks[4]	DRA*		$165	2010	$199.79

Table 2: Consumer/Wage & Hour Class Action Lodestar Crosschecks					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Jonathan E. Gertler[52]	Chavez & Gertler	31 (1983)	$725	2013	$797.78
Todd Schneider[54]	Schneider Wallace	29 (1982)	$675	2011	$791.67
Patrick N. Keegan[53]	Keegan & Baker LLP	20 (1993)	$695	2013	$764.77
Shawn Khorrami[58]	Khorrami Boucher Sumner Sanguinetti, LLP	19 (1995)	$650	2014	$692.80
Guy Wallace[51]	Schneider Wallace	17 (1993)	$650	2010	$787.05
Jonathan Selbin[57]	Lieff Cabraser	16 [1993]	$600	2009	$750.04
Eric Gibbs[55]	Girard Gibbs	15 (1995)	$675	2010	$817.32
Eric Gibbs[56]	Girard Gibbs	15 (1995)	$675	2010	$817.32
Josh Konecky[51]	Schneider Wallace	14 (1996)	$625	2010	$756.78
Dan L. Gildor[52]	Chavez & Gertler	12 (2002)	$550	2013	$605.21
Launa Adolph[58]	Khorrami Boucher Sumner Sanguinetti, LLP	11 (2003)	$495	2014	$527.60
Dylan Hughes[56]	Girard Gibbs	10 (2000)	$545	2010	$787.05
Dylan Hughes[55]	Girard Gibbs	10 (2000)	$545	2010	$659.91

Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Unnamed[84]	Lieff Cabraser	42 (1970)	$900	2012	$1,022.43
Thomas J. Nolan[82]	Skadden Arps	40 (1971)	$1095	2011	$1,284.26
Unnamed[11]	Arnold & Porter	39 (1974)	$910	2013	$1,001.35
Unnamed[92]	Munger, Tolles & Olson	39 (1970)	$625	2009	$781.30
Unnamed[84]	Lieff Cabraser	38 (1974)	$900	2012	$1,022.43
Gordon Kirscher[90]	O'Melveny &Myers	38 (1971)	$860	2009	$1,075.06
Unnamed[91]	Paul Hastings	36 (1974)	$940	2010	$1,138.19
Unnamed[84]	Lieff Cabraser	34 (1978)	$800	2012	$908.83
Unnamed[92]	O'Melveny & Myers	34 (1975)	$860	2009	$1,075.06
Unnamed[85]	Paul Hastings	33 (1978)	$940	2011	$1,102.47
Daniel Kolkey[86]	Gibson Dunn	32 (1977)	$840	2009	$1,050.06
Unnamed[92]	Pachulski, Stang et al.	32 (1977)	$650	2009	$812.55
Unnamed[92]	Hennigan, Bennett & Dorman	31 (1978)	$680	2009	$850.05
Unnamed[92]	Hennigan, Bennett & Dorman	30 (1979)	$760	2009	$950.06
Unnamed[84]	Lieff Cabraser	29 (1983)	$775	2012	$880.43
Arturo Gonzalez[83]	MoFo	28 (1985)	$950	2013	$1,045.36
Unnamed[92]	Pachulski, Stang et al.	27 (1982)	$750	2009	$937.56
Wayne Barsky[86]	Gibson Dunn	26 (1983)	$905	2009	$1,131.32
Unnamed[92]	Munger, Tolles & Olson	25 (1984)	$550	2009	$687.54

Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Brian J. Hennigan[89]	Irell & Manella	25 (1983)	$775	2008	$1,000.20
Unnamed[92]	Gibson Dunn & Crutcher	25 (1974)	$790	2009	$987.56
Marc Becker[81]	Quinn Emanuel	24 (1988)	$1035	2012	$1,175.80
Unnamed[84]	Lieff Cabraser	24 (1988)	$775	2012	$880.43
Unnamed[92]	White & Case	24 (1985)	$750	2009	$937.56
Unnamed[92]	Morrison & Foerster	24 (1985)	$750	2009	$937.56
Unnamed[92]	Pachulski, Stang et al.	24 (1985)	$675	2009	$843.80
Unnamed[85]	Paul Hastings	23 (1998)	$850	2011	$996.92
Christopher Cox[95]	Weil Gotshal	23 (1991)	$850	2014	$905.97
Unnamed[92]	Davis, Polk & Wardwell	23 (1986)	$960	2009	$1,200.07
Unnamed[92]	Weil, Gotscahl & Manges	23 (1986)	$799	2009	$998.81
Alejandro Mayorkas[90]	O'Melveny &Myers	23 (1986)	$770	2009	$962.56
Unnamed[92]	Pachulski, Stang et al.	22 (1987)	$725	2009	$906.30
Unnamed[92]	Munger, Tolles & Olson	22 (1987)	$725	2009	$906.30
Unnamed[84]	Lieff Cabraser	21 (1991)	$700	2012	$795.22
Marcellus McRae[86]	Gibson Dunn	21 (1988)	$785	2009	$981.31
Unnamed[92]	Munger, Tolles & Olson	21 (1988)	$600	2009	$750.04
Mark D. Kemple[88]	Greenberg Traurig	20 (1989)	$675	2009	$871.14
Unnamed[92]	Pachulski, Stang et al.	20 (1989)	$645	2009	$806.30
Unnamed[11]	Quinn Emanuel	20	$700	2013	$770.27
Unnamed[92]	Davis, Polk & Wardwell	19 (1990)	$955	2009	$1,193.82
Unnamed[92]	Klee, Tuchin, Bogdanoff, & Stern	19 (1990)	$850	2009	$1,062.56

Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Glenn Peterson[96]	Millstone Peterson & Watts	18 (1996)	$600	2014	$639.51
Jason D. Russell[82]	Skadden Arps	18 (1993)	$1030	2011	$1,208.03
Unnamed[92]	Gibson Dunn & Crutcher	18 (1991)	$610	2009	$762.55
Unnamed[92]	Klee, Tuchin, Bogdanoff, & Stern	18 (1991)	$590	2009	$737.54
Michal H. Strub[89]	Irell & Manella	18 (1990)	$670	2008	$864.69
Paralegal[90]	O'Melveny &Myers	17 (2004)	$310	2009	$387.52
Unnamed[84]	Lieff Cabraser	17 (1995)	$650	2012	$738.42
Unnamed[85]	Paul Hastings	17 (1994)	$725	2011	$850.31
Unnamed[92]	Morrison & Foerster	17 (1992)	$650	2009	$812.55
Amy Lalley[94]	Sidley Austin	16 (1998)	$825	2014	$937.23
Unnamed[91]	Paul Hastings	16 (1994)	$725	2010	$877.86
Diane Hutnyan[81]	Quinn Emanuel	15 (1997)	$790	2012	$897.47
Unnamed[85]	Paul Hastings	15 (1996)	$725	2011	$850.31
Unnamed[92]	Gibson Dunn & Crutcher	15 (1994)	$525	2009	$656.29
Danielle Gilmore[87]	Quinn Emanuel	15 (1993)	$685	2008	$884.05
Daniel Perry[93]	Milbank, Tweed	14 (2000)	$1135	2014	$1,209.74
Amy Lalley[94]	Sidley Austin	14 (1998)	$700	2012	$795.22
Unnamed[84]	Lieff Cabraser	14 (1998)	$585	2012	$664.58
Thomas M. Riordan[90]	O'Melveny &Myers	14 (1995)	$675	2009	$843.80
Unnamed[92]	Pachulski, Stang et al.	14 (1995)	$535	2009	$668.79
Victoria Maroulis[81]	Quinn Emanuel	13 (1999)	$815	2012	$925.87

Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Delilah Vinzon[93]	Milbank, Tweed	12 (2002)	$900	2014	$959.26
Todd Briggs[81]	Quinn Emanuel	12 (2000)	$735	2012	$834.99
Melissa Dalziel[81]	Quinn Emanuel	12 (2000)	$730	2012	$829.31
Unnamed[85]	Paul Hastings	12 (1999)	$670	2011	$785.80
Unnamed[92]	Klee, Tuchin, Bogdanoff, & Stern	12 (1997)	$650	2009	$812.55
Unnamed[92]	Gibson Dunn & Crutcher	12 (1997)	$635	2009	$793.80
Unnamed[92]	Munger, Tolles & Olson	12 (1997)	$525	2009	$656.29
Unnamed[84]	Lieff Cabraser	11 (2001)	$525	2012	$596.42
Unnamed[91]	Paul Hastings	11 (1999)	$670	2010	$811.27
Erik Swanholt[88]	Greenberg Traurig	11 (1998)	$575	2009	$742.08
Hillary A. Hamilton[82]	Skadden Arps	10 (2001)	$710	2011	$832.72
Unnamed[91]	Paul Hastings	10 (2000)	$660	2010	$799.16
Jorge DeNeve[90]	O'Melveny &Myers	10 (1998)	$620	2009	$775.05
Unnamed[11]	Arnold & Porter	09 (2004)	$625	2013	$687.74
Unnamed[85]	Paul Hastings	09 (2002)	$630	2011	$738.89
Unnamed[92]	Morrison & Foerster	09 (2000)	$535	2009	$668.79
Unnamed[92]	Hennigan, Bennett & Dorman	09 (2000)	$505	2009	$631.29
Hannah Cannom[93]	Milbank, Tweed	08 (2006)	$800	2014	$810.05
Unnamed[85]	Paul Hastings	08 (2003)	$620	2011	$727.16
Unnamed[92]	White & Case	08 (2001)	$655	2009	$818.80
Allan Johnson[90]	O'Melveny &Myers	08 (2001)	$565	2009	$706.29

Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Suzanna Brickman[83]	MoFo	07 (2006)	$650	2013	$715.25
Unnamed[85]	Paul Hastings	07 (2004)	$590	2011	$691.98
Revi-Ruth Enriquez[93]	Milbank, Tweed	06 (2008)	$760	2014	$852.68
Caitlin Hawks[93]	Milbank, Tweed	06 (2008)	$760	2014	$810.05
Alex Doherty[94]	Sidley Austin	06 (2008)	$700	2014	$746.09
Unnamed[84]	Lieff Cabraser	06 (2006)	$435	2012	$494.18
Unnamed[85]	Paul Hastings	06 (2005)	$565	2011	$662.66
Unnamed[92]	White & Case	06 (2003)	$600	2009	$750.04
Unnamed[92]	Weil, Gotscahl & Manges	06 (2003)	$580	2009	$725.04
Unnamed[92]	Gibson Dunn & Crutcher	06 (2003)	$570	2009	$712.54
Katherine Eklund[93]	Milbank, Tweed	05 (2009)	$550	2014	$586.22
Unnamed[85]	Paul Hastings	05 (2006)	$530	2011	$621.61
Danielle Katzir[86]	Gibson Dunn	05 (2004)	$525	2009	$656.29
Paralegal[90]	O'Melveny &Myers	05 (2004)	$225	2009	$281.27
Katherine J. Galston[89]	Irell & Manella	05 (2003)	$490	2008	$1,075.06
Dena G. Kaplan[89]	Irell & Manella	05 (2003)	$475	2008	$613.02
Bambo Obaro[95]	Weil Gotshal	04 (2010)	$400	2014	$426.34
Alex Doherty[94]	Sidley Austin	04 (2008)	$520	2012	$590.74
Unnamed[84]	Lieff Cabraser	04 (2008)	$395	2012	$448.73
Unnamed[85]	Paul Hastings	04 (2007)	$500	2011	$586.42
Unnamed[92]	Davis, Polk & Wardwell	04 (2005)	$680	2009	$850.05
Unnamed[92]	Weil, Gotscahl & Manges	04 (2005)	$500	2009	$625.04
Multiple associates[86]	Gibson Dunn	04 (2005)	$495	2009	$618.79

Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Unnamed[92]	Munger, Tolles & Olson	04 (2005)	$450	2009	$562.53
Unnamed[92]	Munger, Tolles & Olson	04 (2005)	$435	2009	$543.78
Unnamed[92]	White & Case	04 (2004)	$600	2009	$750.04
Kimberly A. Svendsen[89]	Irell & Manella	04 (2004)	$410	2008	$529.14
Unnamed[92]	Munger, Tolles & Olson	04 (2004)	$395	2009	$493.78
Unnamed[85]	Paul Hastings	03 (2008)	$450	2011	$527.78
Melissa Barshop[86]	Gibson Dunn	03 (2006)	$470	2009	$587.54
Unnamed[92]	Gibson Dunn & Crutcher	03 (2006)	$470	2009	$587.54
Unnamed[92]	Weil, Gotscahl & Manges	03 (2006)	$465	2009	$581.28
Abby Schwartz[90]	O'Melveny &Myers	03 (2006)	$450	2009	$562.53
Hirad Dadgostar[88]	Greenberg Traurig	03 (2006)	$400	2008	$516.23
Unnamed[92]	Munger, Tolles & Olson	03 (2006)	$400	2009	$500.03
Unnamed[92]	O'Melveny & Myers	03 (2006)	$395	2009	$493.78
Multiple associates[86]	Gibson Dunn	02 (2007)	$400	2009	$500.03
Sara Brenner[87]	Quinn Emanuel	02 (2006)	$340	2008	$438.80
Lauren McCray[94]	Sidley Austin	02 (1998)	$495	2014	$527.60
Unnamed[84]	Lieff Cabraser	01 (2011)	$325	2012	$369.21
Jessica Mohr[95]	Weil Gotshal	01 (2013)	$300	2014	$319.75
Unnamed[85]	Paul Hastings	01 (2010)	$360	2011	$422.22
Unnamed[92]	Weil, Gotscahl & Manges	01 (2008)	$355	2009	$443.78
Multiple associates[86]	Gibson Dunn	01 (2008)	$345	2009	$431.28
Lauren McCray[94]	Sidley Austin	01 (1998)	$340	2012	$386.25

Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Paralegal[89]	Irell & Manella		$220	2008	$962.56
Unnamed[11]	Quinn Emanuel		$821	2013	$903.41
Unnamed[11]	Quinn Emanuel		$448	2013	$492.97
Sr. Paralegal[91]	Paul Hastings		$330	2010	$399.58
Paralegal[86]	Gibson Dunn		$315	2009	$393.77
Paralegal[86]	Gibson Dunn		$300	2009	$375.02
Paralegal[86]	Gibson Dunn		$295	2009	$368.77
Legal Assistant[82]	Skadden Arps		$295	2011	$345.99
Paralegal[87]	Quinn Emanuel		$235	2008	$303.29

III. RATES FROM SECTION I ORGANIZED FROM HIGH TO LOW

Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Ian Herzog[24]	Law Office of Ian Herzog	44 (1967)	$1,000	2011	$1,172.84
Jose R. Allen[35]	Skadden, Arps	31 (1985)	$1150	2016	$1,150
Jose R. Allen[4]	Skadden Arps	34 (1976)	$930	2010	$1,126.08
Barrett S. Litt[34]	Kaye, McLane, Bednarski & Litt	45 (1969	$975	2014	$1,039.20
Unnamed[10]	Rosen Bien & Galvan	48 (1962)	$800	2010	$1,032.46

RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES

Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Sid Wolinsky[4]	DRA*	49 (1961)	$835	2010	$1,011.05
Barrett S. Litt[6]	Litt, Estuar & Kitson	40 (1969)	$800	2009	$1,000.06
Paul R. Fine[24]	Daniels, Fine, Israel, Schonbuch & Lebovits	39 (1972)	$850	2011	$996.92
Sid Wolinsky[13]	DRA*	51 (1961)	$860	2012	$976.99
Barrett S. Litt[15]	Litt, Estuar & Kitson	39 (1969)	$750	2008	$967.93
Barrett S. Litt[7]	Litt, Estuar & Kitson	38 (1969)	$725	2007	$965.98
Barrett S. Litt[8]	Litt, Estuar & Kitson	43 (1969)	$850	2012	$965.63
Stephen Glick[24]	Law Offices of Stephen Glick	37 (1974)	$800	2011	$938.27
Paul L. Hoffman[6]	Schonbrun, de Simone	33 (1976)	$750	2009	$937.56
Dan Stormer[8]	HSKRR****	38 (1974)	$825	2012	$937.23
Bill Lann Lee[18]	Lewis, Feinberg, Lee, Renaker, & Jackson	38 (1974)	$825	2012	$937.23
Mark Rosenbaum[2]	ACLU	35 (1974)	$740	2009	$925.06
Larry Paradis[13]	DRA*	27 (1985)	$800	2012	$908.83
Chritopher Cox[29]	Weill Gotschall	23 (1991)	$850	2014	$905.97
Sanford J. Rosen[12]	Rosen Bien & Galvan	46 (1962)	$700	2008	$903.40
Unnamed[10]	Prison Law Office	32 (1978)	$700	2010	$903.40
Unnamed[10]	Bingham, McCutcheon	32 (1978)	$700	2010	$903.40
Daniel B. Kohrman[4]	AFL*****	26 (1984)	$740	2010	$896.02
Carol Sobel[2]	Law Ofc Carol Sobel	31 (1978)	$710	2009	$887.55
Carol A. Sobel[6]	Law Offices of Carol Sobel	31 (1978)	$710	2009	$887.55
Laurence Paradis[4]	DRA*	26 (1985)	$730	2010	$883.92
Robert Rubin[20]	LCCR	28 (1978)	$625	2006	$859.73

RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES

Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Dale Galipo[32]	Law Ofc Dale Galipo	30 (1984)	$800	2014	$852.68
Matthew Righetti[19]	Righetti Glugoski	27 (1985)	$750	2012	$852.03
Carol Sobel[21]	Law Office of Carol Sobel	32 (1978)	$725	2010	$850.31
Unnamed[10]	Bingham, McCutcheon	13 (1997)	$655	2010	$845.33
David M. McLane[34]	Kaye, McLane, Bednarski & Litt	28 (1988)	$775	2014	$826.03
Ronald O. Kaye[34]	Kaye, McLane, Bednarski & Litt	26 (1988)	$775	2014	$826.03
Ronald K. Tellis[30]	Baron & Budd	18 (1996)	$775	2014	$826.03
Michael Bien[9]	Rosen Bien Galvan & Grunfeld	28 (2008)	$640	2008	$825.97
Dale Galipo[33]	Law Ofc Dale Galipo	30 (1984)	$800	2014	$825.92
Angela Padilla[20]	MoFo	15 (1991)	$600	2006	$825.34
Ron Elsberry[13]	DRA*	25 (1987)	$725	2012	$823.63
Richard Pearl[27]		44 (1970)	$750	2014	$799.39
Julie Nepveu[4]	AFL*****	19 (1991)	$660	2010	$799.16
Amitai Schwartz[11]	Law Offices of Amitai Schwartz	40 (1973)	$725	2013	$797.78
John Houston Scott[11]	Scott Law Firm	37 (1976)	$725	2013	$797.78
Thomas P. Greerty[11]	Law Offices of Thomas P. Greerty	34 (1979)	$725	2013	$797.78
Jim DeSimone[28]	Schonbrun, de Simone	28 (1985)	$725	2013	$797.78
Dale Galipo[16]	Law Ofc of Dale Galipo	28 (1984)	$700	2012	$795.22
Michelle Uzeta[13]	DRLC***	20 (1992)	$700	2012	$795.22
Matthew McNicholas[17]	McNicholas & McNicholas	15 (1997)	$700	2012	$795.22
David Borgen[35]	Goldstein Borgen Dardarian	35 (1981	$795	2016	$795
Brian Dunn[36]	Cochran Firm	21 (1995)	$795	2016	$795
James de Simone[3]	Schoenbrun, de Simon	27 (1985)	$695	2012	$789.54

RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES

Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Melissa Kasnitz[4]	DRA*	18 (1992)	$650	2010	$787.05
Linda Dardarian[35]	Goldstein Borgen Dardarian	29 (1987)	$775	2016	$775
Earnest Bell[15]	Law Offices of Earnest Bell	20 (1988)	$600	2008	$774.35
Michael Haddad[27]	Haddad & Sherwin	23 91991)	$725	2014	$772.74
Ben Schonbrun[5]	Schonbrun, de Simone	25 (1985)	$650	2010	$762.35
Scott A. Brooks[24]	Daniels, Fine, Israel, Schonbuch & Lebovits	19 (1992)	$650	2011	$762.35
Shawna Parks[13]	DRA*	13 (1999)	$665	2012	$755.46
Guy Wallace[35]	Schneider Wallace	23 (1993)	$750	2016	$750
Timothy G. Blood[30]	Blood Hurst and O'Reardon	24 (1990)	$695	2014	$740.77
Julia Sherwin[27]	Haddad & Sherwin	19 (1995)	$695	2014	$740.77
John Glugoski[19]	Righetti Glugoski	12 (1997)	$650	2012	$738.42
Michael Seplow[28]	Schonbrun, de Simone	23 (1990)	$660	2013	$726.25
Unnamed[10]	Rosen Bien & Galvan	13 (1997)	$560	2010	$722.72
Dale Galipo[26]	Law Ofc Dale Galipo	23 (1989)	$675	2013	$719.45
Michael Seplow[3]	Schoenbrun, de Simon	22 (1990)	$630	2012	$715.70
Bryan M. Miller[8]	Litt, Estuar & Kitson	18 (1994)	$625	2012	$710.02
Robert M. Kitson[8]	Litt, Estuar & Kitson	17 (1995)	$625	2012	$710.02
Susan Abitanta[24]	Law Office of Ian Herzog	28 (1983)	$600	2011	$703.71
Hector O. Villagra[1]	ACLU	17 (1994)	$600	2011	$703.71
Shawna Parks[35]	Law Ofc Shawna Parks	17 (1999)	$695	2016	$695
Todd Burns[23]	Law Office of Todd Burns	18 (1996)	$650	2014	$692.80
Rebecca Grey[25]		16 (1998)	$650	2014	$692.80
Gene J. Stonebarger[31]	Stonebarger Law, APC	14 (2000)	$650	2014	$692.80

RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES

Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Michael Seplow[5]	Schonbrun, de Simone	20 (1990)	$590	2010	$691.98
Jennifer Bezoza[4]	DRA*	10 (2000)	$570	2010	$690.18
Robert Dell Angelo[14]	MTO**	17 (1992)	$550	2009	$687.54
Douglas D. Winter[17]	McNicholas & McNicholas	22 (1990)	$600	2012	$681.62
Katherine Weed[13]	DRA*	10 (2002)	$600	2012	$681.62
Roger Heller[4]	DRA*	09 (2001)	$560	2010	$678.07
Peter Eliasberg[2]	ACLU	15 (1994)	$525	2009	$656.29
Shawna Parks[14]	DRLC	10 (1999)	$525	2009	$656.29
Kevin Knestrick[4]	DRA*	07 (2003)	$535	2010	$647.80
Paul Estuar[7]	Litt, Estuar & Kitson	14 (1993)	$485	2007	$646.21
Joseph J. Ybarra[1]	MTO**	10 (2001)	$550	2011	$645.06
Nathaniel Fisher[4]	Skadden Arps	02 (2008)	$530	2010	$641.75
Kevin LaHue[34]	Kaye, McLane, Bednarski & Litt	10 (2004)	$600	2014	$639.51
Douglas Ingraham[28]	Schonbrun, de Simone	15 (1998)	$575	2013	$632.72
Mary-Lee Smith[13]	DRA*	07 (2005)	$555	2012	$630.50
Jennifer Lee[13]	DRLC***	09 (2003)	$550	2012	$624.82
John Raphling[5]	Schonbrun, de Simone	17 (1993)	$525	2010	$615.74
Belinda Escobosa Helzer[1]	ACLU	11 (2000)	$525	2011	$615.74
Kasey Corbit[4]	DRA*	06 (2004)	$500	2010	$605.42
Matthew Strugar[13]	DRLC***	08 (2004)	$525	2012	$596.42
Sage Reeves[14]	DRLC	08 (2001)	$475	2009	$593.79
Jacob A. Kreilkamp[1]	MTO**	08 (2003)	$505	2011	$592.29
Mary–Lee Kimber[4]	DRA*	05 (2005)	$475	2010	$575.15

RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES

Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Peter Bibring[1]	ACLU	09 (2002)	$490	2011	$574.69
Humberto Guizar[16]		26 (1986)	$500	2012	$568.02
Catherine Schmidt[17]	McNicholas & McNicholas	11 (2001)	$500	2012	$568.02
Laura D. Smolowe[1]	MTO**	05 (2006)	$460	2011	$539.51
Richard D. Lambert[31]	Stonebarger Law	07 (2007)	$500	2014	$532.92
Caitlin Weisberg[34]	Kaye, McLane, Bednarski & Litt	06 (2008)	$500	2014	$532.92
Rebecca Thornton[6]	Law Offices of Carol Sobel	08 (2001)	$425	2009	$531.28
Rebecca Thornton[21]	Law Office of Carol Sobel	09 (2001)	$450	2010	$527.78
Unnamed[10]	Bingham, McCutcheon	02 (2008)	$400	2010	$516.23
Anna Canning[3]	Schoenbrun, de Simon	06 (2006)	$450	2012	$511.22
Debra Patkin[13]	DRLC***	05 (2007)	$450	2012	$511.22
Matthew Strugar[14]	DRLC	05 (2004)	$400	2009	$500.03
Moira Duvernay[11]	Law Offices of Amitai Schwartz	09 (2004)	$450	2013	$495.17
Bethany Woodard[14]	MTO**	04 (2005)	$395	2009	$493.78
Karla Gilbride[13]	DRA*	05 (2007)	$430	2012	$488.50
Stephanie Biedermann[13]	DRA*	05 (2007)	$430	2012	$488.50
Christine Chuang[13]	DRA*	05 (2007)	$430	2012	$488.50
Sheryl Wu Leung[4]	Skadden Arps	05 (2005)	$395	2010	$478.28
Craig Momita[24]	Daniels, Fine, Israel, Schonbuch & Lebovits	18 (1993)	$400	2011	$469.14
Peter Bibring[2]	ACLU	07 (2002)	$375	2009	$468.78
Heather McGunigle[22]	DRLC	04 (2009)	$375	2009	$468.78
Marina A. Torres[1]	MTO**	03 (2008)	$385	2011	$451.54

RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES

Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Sarala V. Nagala[1]	MTO**	03 (2008)	$385	2011	$451.54
Kristina Wilson[14]	MTO**	03 (2006)	$350	2009	$437.53
Genevieve Guertin[27]	Haddad & Sherwin	05 (2009)	$400	2014	$426.34
Bambo Obarro[29]	Weill Gotschall	04 (2010)	$400	2014	$426.34
Stephanie Biedermann[4]	DRA*	03 (2007)	$350	2010	$423.80
Mahogany Jenkins[20]	MoFo	02 (2004)	$285	2006	$392.03
Technology manager[4]	Skadden Arps		$320	2010	$387.47
Kara Janssen[13]	DRA*	02 (2010)	$330	2012	$374.89
Gina Altomare[27]	Haddad & Sherwin	04 (2010)	$350	2014	$373.05
Stacey Brown[7]	Litt, Estuar & Kitson	01 (2006)	$275	2007	$366.41
Unnamed[10]	Prison Law Office	01 (2009)	$275	2010	$354.91
Thomas Kennedy Helm[27]	Haddad & Sherwin	02 (2012)	$325	2014	$346.40
Legal assistant[4]	Skadden Arps		$285	2010	$345.09
Becca von Behren[4]	DRA*	02 (2008)	$265	2010	$320.87
Senior paralegals[4]	DRA*		$265	2010	$320.87
Julia White[34] [Sr. Paralegal]	Kaye, McLane, Bednarski & Litt		$295	2014	$314.43
Sr. paralegal[10]	Rosen Bien & Galvan		$240	2010	$309.74
Sr. Paralegal[15]	Litt, Estuar & Kitson		$235	2008	$303.29
Senior Paralegals[7]	Litt, Estuar & Kitson		$225	2007	$299.79
Summer associates[4]	DRA*		$245	2010	$296.66
ALS[1]	MTO**		$250	2011	$293.21

RATE TABLES: TABLE 1 – CIVIL RIGHTS LITIGATION AWARDS; TABLE 2 – CONSUMER CLASS ACTION AWARDS; TABLE 3 – COMMERCIAL LITIGATION AWARDS AND RATES

Table 1: Civil Rights Lodestar Awards/Lodestar Crosschecks					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Sr. paralegal[8]	Litt, Estuar & Kitson		$250	2012	$284.01
Paralegal	DRA*		$240	2012	$284.01
Law Clerks[14]	MTO**		$220	2009	$275.02
Summer Associates[13]	DRA*		$250	2012	$272.65
Paralegals[4]	DRA*		$225	2010	$272.44
Law Clerk[13]	DRLC***		$230	2012	$261.29
Litigation Assist[13]	DRLC***		$230	2012	$261.29
Law student interns[8]	Litt, Estuar & Kitson		$225	2012	$255.61
Heath White[34] [High Tech Paralegal]	Kaye, McLane, Bednarski & Litt		$235	2014	$250.47
Paralegal[1]	MTO**		$210	2011	$246.30
Paralegal[20]	MoFo		$175	2006	$240.72
Paralegal[1]	ACLU		$200	2011	$234.57
Law student interns[3]	Schoenbrun, de Simon		$200	2012	$227.21
Paralegals (not senior)[27]	Haddad & Sherwin		$200	2014	$213.17
Law clerks[4]	DRA*		$175	2010	$211.90
Case clerks[4]	DRA*		$165	2010	$199.79

Table 2: Consumer/Wage & Hour Class Action Lodestar Crosschecks					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Eric Gibbs[55]	Girard Gibbs	15 (1995)	$675	2010	$817.32
Eric Gibbs[56]	Girard Gibbs	15 (1995)	$675	2010	$817.32
Jonathan E. Gertler[52]	Chavez & Gertler	31 (1983)	$725	2013	$797.78
Todd Schneider[54]	Schneider Wallace	29 (1982)	$675	2011	$791.67
Guy Wallace[51]	Schneider Wallace	17 (1993)	$650	2010	$787.05
Dylan Hughes[56]	Girard Gibbs	10 (2000)	$545	2010	$787.05
Patrick N. Keegan[53]	Keegan & Baker LLP	20 (1993)	$695	2013	$764.77
Josh Konecky[51]	Schneider Wallace	14 (1996)	$625	2010	$756.78
Jonathan Selbin[57]	Lieff Cabraser	16 [1993]	$600	2009	$750.04
Shawn Khorrami[58]	Khorrami Boucher Sumner Sanguinetti, LLP	19 (1995)	$650	2014	$692.80
Dylan Hughes[55]	Girard Gibbs	10 (2000)	$545	2010	$659.91
Dan L. Gildor[52]	Chavez & Gertler	12 (2002)	$550	2013	$605.21
Launa Adolph[58]	Khorrami Boucher Sumner Sanguinetti, LLP	11 (2003)	$495	2014	$527.60

Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Thomas J. Nolan[82]	Skadden Arps	40 (1971)	$1095	2011	$1,284.26
Daniel Perry[93]	Milbank, Tweed	14 (2000)	$1135	2014	$1,209.74

Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Jason D. Russell[82]	Skadden Arps	18 (1993)	$1030	2011	$1,208.03
Unnamed[92]	Davis, Polk & Wardwell	23 (1986)	$960	2009	$1,200.07
Unnamed[92]	Davis, Polk & Wardwell	19 (1990)	$955	2009	$1,193.82
Marc Becker[81]	Quinn Emanuel	24 (1988)	$1035	2012	$1,175.80
Unnamed[91]	Paul Hastings	36 (1974)	$940	2010	$1,138.19
Wayne Barsky[86]	Gibson Dunn	26 (1983)	$905	2009	$1,131.32
Unnamed[85]	Paul Hastings	33 (1978)	$940	2011	$1,102.47
Gordon Kirscher[90]	O'Melveny &Myers	38 (1971)	$860	2009	$1,075.06
Unnamed[92]	O'Melveny & Myers	34 (1975)	$860	2009	$1,075.06
Katherine J. Galston[89]	Irell & Manella	05 (2003)	$490	2008	$1,075.06
Unnamed[92]	Klee, Tuchin, Bogdanoff, & Stern	19 (1990)	$850	2009	$1,062.56
Daniel Kolkey[86]	Gibson Dunn	32 (1977)	$840	2009	$1,050.06
Arturo Gonzalez[83]	MoFo	28 (1985)	$950	2013	$1,045.36
Unnamed[84]	Lieff Cabraser	42 (1970)	$900	2012	$1,022.43
Unnamed[84]	Lieff Cabraser	38 (1974)	$900	2012	$1,022.43
Unnamed[11]	Arnold & Porter	39 (1974)	$910	2013	$1,001.35
Brian J. Hennigan[89]	Irell & Manella	25 (1983)	$775	2008	$1,000.20
Unnamed[92]	Weil, Gotscahl & Manges	23 (1986)	$799	2009	$998.81
Unnamed[85]	Paul Hastings	23 (1998)	$850	2011	$996.92
Unnamed[92]	Gibson Dunn & Crutcher	25 (1974)	$790	2009	$987.56
Marcellus McRae[86]	Gibson Dunn	21 (1988)	$785	2009	$981.31
Alejandro Mayorkas[90]	O'Melveny &Myers	23 (1986)	$770	2009	$962.56

Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Paralegal[89]	Irell & Manella		$220	2008	$962.56
Delilah Vinzon[93]	Milbank, Tweed	12 (2002)	$900	2014	$959.26
Unnamed[92]	Hennigan, Bennett & Dorman	30 (1979)	$760	2009	$950.06
Unnamed[92]	Pachulski, Stang et al.	27 (1982)	$750	2009	$937.56
Unnamed[92]	White & Case	24 (1985)	$750	2009	$937.56
Unnamed[92]	Morrison & Foerster	24 (1985)	$750	2009	$937.56
Amy Lalley[94]	Sidley Austin	16 (1998)	$825	2014	$937.23
Victoria Maroulis[81]	Quinn Emanuel	13 (1999)	$815	2012	$925.87
Unnamed[84]	Lieff Cabraser	34 (1978)	$800	2012	$908.83
Unnamed[92]	Pachulski, Stang et al.	22 (1987)	$725	2009	$906.30
Unnamed[92]	Munger, Tolles & Olson	22 (1987)	$725	2009	$906.30
Christopher Cox[95]	Weil Gotshal	23 (1991)	$850	2014	$905.97
Unnamed[11]	Quinn Emanuel		$821	2013	$903.41
Diane Hutnyan[81]	Quinn Emanuel	15 (1997)	$790	2012	$897.47
Danielle Gilmore[87]	Quinn Emanuel	15 (1993)	$685	2008	$884.05
Unnamed[84]	Lieff Cabraser	29 (1983)	$775	2012	$880.43
Unnamed[84]	Lieff Cabraser	24 (1988)	$775	2012	$880.43
Unnamed[91]	Paul Hastings	16 (1994)	$725	2010	$877.86
Mark D. Kemple[88]	Greenberg Traurig	20 (1989)	$675	2009	$871.14
Michal H. Strub[89]	Irell & Manella	18 (1990)	$670	2008	$864.69
Revi-Ruth Enriquez[93]	Milbank, Tweed	06 (2008)	$760	2014	$852.68
Unnamed[85]	Paul Hastings	17 (1994)	$725	2011	$850.31

Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Unnamed[85]	Paul Hastings	15 (1996)	$725	2011	$850.31
Unnamed[92]	Hennigan, Bennett & Dorman	31 (1978)	$680	2009	$850.05
Unnamed[92]	Davis, Polk & Wardwell	04 (2005)	$680	2009	$850.05
Unnamed[92]	Pachulski, Stang et al.	24 (1985)	$675	2009	$843.80
Thomas M. Riordan[90]	O'Melveny &Myers	14 (1995)	$675	2009	$843.80
Todd Briggs[81]	Quinn Emanuel	12 (2000)	$735	2012	$834.99
Hillary A. Hamilton[82]	Skadden Arps	10 (2001)	$710	2011	$832.72
Melissa Dalziel[81]	Quinn Emanuel	12 (2000)	$730	2012	$829.31
Unnamed[92]	White & Case	08 (2001)	$655	2009	$818.80
Unnamed[92]	Pachulski, Stang et al.	32 (1977)	$650	2009	$812.55
Unnamed[92]	Morrison & Foerster	17 (1992)	$650	2009	$812.55
Unnamed[92]	Klee, Tuchin, Bogdanoff, & Stern	12 (1997)	$650	2009	$812.55
Unnamed[91]	Paul Hastings	11 (1999)	$670	2010	$811.27
Hannah Cannom[93]	Milbank, Tweed	08 (2006)	$800	2014	$810.05
Caitlin Hawks[93]	Milbank, Tweed	06 (2008)	$760	2014	$810.05
Unnamed[92]	Pachulski, Stang et al.	20 (1989)	$645	2009	$806.30
Unnamed[91]	Paul Hastings	10 (2000)	$660	2010	$799.16
Unnamed[84]	Lieff Cabraser	21 (1991)	$700	2012	$795.22
Amy Lalley[94]	Sidley Austin	14 (1998)	$700	2012	$795.22
Unnamed[92]	Gibson Dunn & Crutcher	12 (1997)	$635	2009	$793.80
Unnamed[85]	Paul Hastings	12 (1999)	$670	2011	$785.80

Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Unnamed[92]	Munger, Tolles & Olson	39 (1970)	$625	2009	$781.30
Jorge DeNeve[90]	O'Melveny &Myers	10 (1998)	$620	2009	$775.05
Unnamed[11]	Quinn Emanuel	20	$700	2013	$770.27
Unnamed[92]	Gibson Dunn & Crutcher	18 (1991)	$610	2009	$762.55
Unnamed[92]	Munger, Tolles & Olson	21 (1988)	$600	2009	$750.04
Unnamed[92]	White & Case	06 (2003)	$600	2009	$750.04
Unnamed[92]	White & Case	04 (2004)	$600	2009	$750.04
Alex Doherty[94]	Sidley Austin	06 (2008)	$700	2014	$746.09
Erik Swanholt[88]	Greenberg Traurig	11 (1998)	$575	2009	$742.08
Unnamed[85]	Paul Hastings	09 (2002)	$630	2011	$738.89
Unnamed[84]	Lieff Cabraser	17 (1995)	$650	2012	$738.42
Unnamed[92]	Klee, Tuchin, Bogdanoff, & Stern	18 (1991)	$590	2009	$737.54
Unnamed[85]	Paul Hastings	08 (2003)	$620	2011	$727.16
Unnamed[92]	Weil, Gotscahl & Manges	06 (2003)	$580	2009	$725.04
Suzanna Brickman[83]	MoFo	07 (2006)	$650	2013	$715.25
Unnamed[92]	Gibson Dunn & Crutcher	06 (2003)	$570	2009	$712.54
Allan Johnson[90]	O'Melveny &Myers	08 (2001)	$565	2009	$706.29
Unnamed[85]	Paul Hastings	07 (2004)	$590	2011	$691.98
Unnamed[11]	Arnold & Porter	09 (2004)	$625	2013	$687.74
Unnamed[92]	Munger, Tolles & Olson	25 (1984)	$550	2009	$687.54
Unnamed[92]	Pachulski, Stang et al.	14 (1995)	$535	2009	$668.79
Unnamed[92]	Morrison & Foerster	09 (2000)	$535	2009	$668.79

Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Unnamed[84]	Lieff Cabraser	14 (1998)	$585	2012	$664.58
Unnamed[85]	Paul Hastings	06 (2005)	$565	2011	$662.66
Unnamed[92]	Gibson Dunn & Crutcher	15 (1994)	$525	2009	$656.29
Unnamed[92]	Munger, Tolles & Olson	12 (1997)	$525	2009	$656.29
Danielle Katzir[86]	Gibson Dunn	05 (2004)	$525	2009	$656.29
Glenn Peterson[96]	Millstone Peterson & Watts	18 (1996)	$600	2014	$639.51
Unnamed[92]	Hennigan, Bennett & Dorman	09 (2000)	$505	2009	$631.29
Unnamed[92]	Weil, Gotscahl & Manges	04 (2005)	$500	2009	$625.04
Unnamed[85]	Paul Hastings	05 (2006)	$530	2011	$621.61
Multiple associates[86]	Gibson Dunn	04 (2005)	$495	2009	$618.79
Dena G. Kaplan[89]	Irell & Manella	05 (2003)	$475	2008	$613.02
Unnamed[84]	Lieff Cabraser	11 (2001)	$525	2012	$596.42
Alex Doherty[94]	Sidley Austin	04 (2008)	$520	2012	$590.74
Melissa Barshop[86]	Gibson Dunn	03 (2006)	$470	2009	$587.54
Unnamed[92]	Gibson Dunn & Crutcher	03 (2006)	$470	2009	$587.54
Unnamed[85]	Paul Hastings	04 (2007)	$500	2011	$586.42
Katherine Eklund[93]	Milbank, Tweed	05 (2009)	$550	2014	$586.22
Unnamed[92]	Weil, Gotscahl & Manges	03 (2006)	$465	2009	$581.28
Unnamed[92]	Munger, Tolles & Olson	04 (2005)	$450	2009	$562.53
Abby Schwartz[90]	O'Melveny &Myers	03 (2006)	$450	2009	$562.53
Unnamed[92]	Munger, Tolles & Olson	04 (2005)	$435	2009	$543.78
Kimberly A.	Irell & Manella	04 (2004)	$410	2008	$529.14

Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Svendsen[89]					
Unnamed[85]	Paul Hastings	03 (2008)	$450	2011	$527.78
Lauren McCray[94]	Sidley Austin	02 (1998)	$495	2014	$527.60
Hirad Dadgostar[88]	Greenberg Traurig	03 (2006)	$400	2008	$516.23
Unnamed[92]	Munger, Tolles & Olson	03 (2006)	$400	2009	$500.03
Multiple associates[86]	Gibson Dunn	02 (2007)	$400	2009	$500.03
Unnamed[84]	Lieff Cabraser	06 (2006)	$435	2012	$494.18
Unnamed[92]	Munger, Tolles & Olson	04 (2004)	$395	2009	$493.78
Unnamed[92]	O'Melveny & Myers	03 (2006)	$395	2009	$493.78
Unnamed[11]	Quinn Emanuel		$448	2013	$492.97
Unnamed[84]	Lieff Cabraser	04 (2008)	$395	2012	$448.73
Unnamed[92]	Weil, Gotscahl & Manges	01 (2008)	$355	2009	$443.78
Sara Brenner[87]	Quinn Emanuel	02 (2006)	$340	2008	$438.80
Multiple associates[86]	Gibson Dunn	01 (2008)	$345	2009	$431.28
Bambo Obaro[95]	Weil Gotshal	04 (2010)	$400	2014	$426.34
Unnamed[85]	Paul Hastings	01 (2010)	$360	2011	$422.22
Sr. Paralegal[91]	Paul Hastings		$330	2010	$399.58
Paralegal[86]	Gibson Dunn		$315	2009	$393.77
Paralegal[90]	O'Melveny &Myers	17 (2004)	$310	2009	$387.52
Lauren McCray[94]	Sidley Austin	01 (1998)	$340	2012	$386.25
Paralegal[86]	Gibson Dunn		$300	2009	$375.02
Unnamed[84]	Lieff Cabraser	01 (2011)	$325	2012	$369.21
Paralegal[86]	Gibson Dunn		$295	2009	$368.77

Table 3: Commercial or Reported Standardized Rates Reflected in Select Attorney Fee Awards, Declarations or Reports					
Atty	**Firm**	**Practice Yrs [Grad Yr]**	**Rate**	**Year**	**Adjusted Rate**
Legal Assistant[82]	Skadden Arps		$295	2011	$345.99
Jessica Mohr[95]	Weil Gotshal	01 (2013)	$300	2014	$319.75
Paralegal[90]	O'Melveny &Myers	12 (1997)	$245	2009	$306.27
Paralegal[87]	Quinn Emanuel		$235	2008	$303.29
Paralegal[90]	O'Melveny &Myers	05 (2004)	$225	2009	$281.27

Attachments

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

COMMUNITIES ACTIVELY LIVING INDEPENDENT AND FREE, a nonprofit corporation, and AUDREY HARTHORN, an individual, on behalf of themselves and ALL OTHERS SIMILARLY SITUATED

Plaintiffs,

vs.

CITY OF LOS ANGELES, a public entity, and COUNTY OF LOS ANGELES, a public entity,

Defendants.

CASE NO. CV 09-0287 CBM (RZx)

CLASS ACTION

ORDER GRANTING PLAINTIFFS' APPLICATION FOR REASONABLE ATTORNEYS' FEES AND COSTS

Before the court is Plaintiffs' Application for Reasonable Attorneys' Fees and Costs. [Docket No. 234.] Plaintiffs have applied to the Court for an order approving attorneys' fees and reimbursement of litigation costs to Class Counsel in the amount of $1,225,000, and up to $75,000 in attorneys' fees and costs for

monitoring the Settlement Agreement ("Agreement"). Defendant County of Los Angeles does not oppose the motion, and these are the amounts contained in the proposed class settlement agreement between the Plaintiffs and the County. Having read the papers submitted and carefully considered the arguments and relevant legal authority, and good cause appearing, the Court GRANTS Plaintiffs' Motion for Reasonable Attorneys' Fees and Costs and finds and rules as follows:

NOW, THEREFORE, IT IS HEREBY ORDERED:

1. The Court finds that Plaintiffs have submitted sufficient evidence supporting their claim for reasonable attorneys' fees and costs, and hereby approves the settlement of attorneys' fees and costs in the amount of $1,225,000 for work performed on this matter, as stated in Section VII of the Agreement. The Court also approves the availability of fees and costs for monitoring the Agreement after Final Approval, in an amount up to $75,000, as stated in Section VI.G of the Agreement.

2. The Court finds that Plaintiffs have provided sufficient evidence, including time records detailing the tasks performed on this matter and declarations from practitioners in the field, supporting the reasonableness of their 2012 requested hourly rates. The Court finds that the requested hourly rates correspond to the prevailing market rate in the relevant community, considering the experience, skill, and reputation of the attorneys in question.

3. Class counsel stated that no other litigation in the country has sought to determine the nature and extent of a municipality's obligation to include persons with disabilities in its emergency preparedness and planning efforts. Therefore, counsel had to conduct considerable research, familiarize themselves with the fact intensive literature on the subject of emergency planning, and explore untested legal theories. The active litigation included extensive, voluminous discovery, numerous depositions, and thousands of pages of

documents. The negotiations were thorough, involving many teleconferences, in-person meetings, and conferences and mediation sessions before two judges. Additionally, after a joint request to stay the litigation, the Court approved a process where Plaintiffs and the Defendant County would coordinate to draft a "Persons with Disabilities and Access and Functional Needs Annex," ("Annex") for which the experts conferred and resolved many issues, and any disputes were referred to counsel. Resolving the issues involved many settlement conferences on the phone and in person, and multiple proposals and drafts by both parties. After the Annex was sent out for public comment in late 2011, the U.S. Department of Justice detailed its concerns, after which a second draft was developed and Defendant County of Los Angeles developed a work plan. Negotiations continued for five months regarding the scope of the Annex and workplan. Parties then attended two mediation sessions in February and July 2012 and were able to resolve all outstanding substantive issues. After the July mediation session, parties continued to work together to finalize the Agreement and other matters, including attorneys' fees and costs. The proposed settlement was approved by the Los Angeles County Board of Supervisors on October 15, 2012.

4. The Court finds that Class Counsel was efficient in allocating work. Counsel states that only four attorneys performed the majority of the work required, that discrete tasks were given to other attorneys as needed, and that a small group of attorneys litigated the entire case. Counsel also states that Attorneys Wolinsky, Smith, and Gilbride from Disability Rights Advocates ("DRA"), and Attorney Parks from Disability Rights Legal Center ("DRLC"), did a majority of the work.

5. In support of the hourly rates quoted by lead attorneys in this case, Attorney Wolinsky is a graduate of Yale Law School in 1961 and has been

practicing law and trying cases for over 50 years. He has been the lead and trial attorney in well over 150 class action and high-impact cases, and has tried and argued cases before the California and New York Federal Courts, the California and Hawaii Supreme Courts, and many other appellate courts. He is the Director of Litigation at DRA and is considered one of the foremost experts nationally on civil rights and disability law, and is requesting an hourly rate of $860. Attorney Parks is a 1999 graduate of University of California at Berkeley, Boalt Hall, and is nationally recognized as a leading disability rights attorney and has been co-director of litigation at DRA since April 2012. From 2005 to March 2012, she was at the DRLC, where she was a litigation attorney, and later the legal director from 2009 to 2012, and is requesting an hourly rate of $665. Attorney Smith is managing attorney at DRA, and graduated from U.C. Berkeley, Boalt Hall Law School in 2005. She received the 2013 California Lawyer Magazine Attorney of the Year Award in the area of Disability Law for her work on this litigation and the 2010 California Lawyer Attorney of the Year Award in the area of Disability Law for her work on the above referenced Caltrans case, and is requesting an hourly rate of $555. Attorney Gilbride is a 2007 graduate of Georgetown Law School and worked on this case as part of DRA. Attorney Gilbride served as a law clerk to Judge Ronald Gould on the U.S. Court of Appeals for the Ninth Circuit in Seattle. She conducted much of the written discovery and took and defended several depositions. She was also responsible for all expert discovery, and is knowledgeable in the requirements for emergency preparedness under the law, and is requesting an hourly rate of $430.

6. In support of the hourly rates quoted by other attorneys in this case, Attorney Uzeta is a 1992 graduate of University of California at Davis, King Hall School of Law, with a Certification in Public Interest Law. She has practiced exclusively in the area of civil rights law, in particular disability rights, since

1993. From February 1995 to August 2008, she worked as an attorney at Disability Rights California ("DRC"), the largest disability rights organization in the nation, where she represented individuals and classes with disabilities in federal and state litigation. From August 2008 to December 2010, she was employed as the Litigation Director of the Southern California Housing Rights Center, a Los Angeles based nonprofit whose mission is to combat housing discrimination, where she engaged mostly in disability discrimination cases, and is requesting an hourly rate of $700. Attorney Paradis is the Executive Director and Co-Director of Litigation at DRA. He graduated from Harvard Law School in 1985 and has extensive experience with disability rights litigation, and has received several awards for his work on precedent setting disability rights cases, including the California Lawyer Magazine Attorney of the Year Award in 2003 and 2011 and the Trial Lawyer of the Year Award from the San Francisco Trial Lawyers Association. Mr. Paradis assisted with advising the litigation team on settlement strategy and potential experts, and is requesting an hourly rate of $800. Attorney Elsberry is a 1987 graduate of University of California, Hastings College of Law. He was a Managing Attorney at DRA from 2009 to 2012, and is currently a Senior Staff Attorney at DRLC. He assisted with certain tasks relating to class certification, and is requesting an hourly rate of $725. Attorney Weed is a 2002 graduate of the University of Michigan Law School. She was involved in the preliminary investigation and review of the voluminous public records, and is requesting an hourly rate of $600. Attorney Biedermann is a 2007 graduate of Yale Law School and was an Arthur Liman Fellow at DRA from 2007 to 2009. She assisted with the review of many public records and drafting the complaint, and is requesting an hourly rate of $430. Attorney Chuang is a 2007 graduate of University of Pennsylvania Law School and has been a Staff Attorney at DRA since 2011. Previously, she was a Litigation Associate at Latham & Watkins LLP.

She primarily worked on finalizing the settlement agreement, providing notice to the class, and drafting the motions for preliminary and final approval, as well as the motion for reasonable attorneys' fees and costs, and is requesting an hourly rate of $430. Attorney Janssen is currently a Staff Attorney at DRA and graduated from New York University School of Law in 2010. She assisted with discrete tasks relating to the negotiation of the County's Work Plan and draft Annex, and is requesting an hourly rate of $330. Attorneys Patkin, Lee, and Strugar worked on the case in their capacity as attorneys at DRLC. Former DRLC staff attorney Patkin is a 2007 graduate of UCLA School of Law, and is requesting an hourly rate of $450. Former DRLC staff attorney Strugar is a 2004 graduate of USC Gould School of Law, and is requesting an hourly rate of $525. Former DRLC staff attorney Lee is a 2003 graduate of Loyola Law School, and is requesting an hourly rate of $550. The Fee Experts cited by Attorneys indicate that the hourly rates requested by all of these attorneys is reasonable.

7. The Court finds that the rate of $240 for DRA's paralegals and $250 for its summer associates is reasonable. DRA's paralegals are college graduates that have worked under attorney supervision for over a year. DRA's summer associates generally have two full years of law school experience before working at DRA for their second-year summer. The Court further finds that the hourly rate of $230 for DRLC's law clerks and litigation assistants is reasonable.

8. The Court hereby approves the following 2012 hourly rates and hours expended:

DRA	Rate	Hours	Fees
Sid Wolinsky	$860.00	700.00	$602,000.00
Shawna Parks	$665.00	81.40	$54,131.00
Mary-Lee Smith	$555.00	139.50	$77,422.50
Karla Gilbride	$430.00	494.40	$212,592.00

DRA	Rate	Hours	Fees
Larry Paradis	$800.00	15.80	$12,640.00
Ron Elsberry	$725.00	18.30	$13,267.50
Katherine Weed	$600.00	20.50	$12,300.00
Stephanie Biedermann	$430.00	184.00	$79,120.00
Christine Chuang	$430.00	125.00	$53,750.00
Kara Janssen	$330.00	36.40	$12,012.00
Summer Associates	$250.00	26.70	$6,675.00
Paralegals	$240.00	260.90	$62,616.00

DRLC	Rate	Hours	Fees
Michelle Uzeta	$700.00	35.50	$24,850.00
Shawna Parks	$665.00	285.60	$189,924.00
Debra Patkin	$450.00	143.50	$64,575.00
Jennifer Lee	$550.00	16.00	$8,800.00
Matthew Strugar	$525.00	20.20	$10,605.00
Law Clerk	$230.00	122.90	$28,267.00
Steve Cueller (Litigation Assist.)	$230.00	4.70	$1,081.00

9. The Court finds that the hourly rates and hours expended are reasonable under established Ninth Circuit law. *See Fischer v. SJB-P.D. Inc.*, 214 F.3d 1115, 1119 (9th Cir. 2000) (citing the lodestar figure and the requirement to consider factors outlined in *Kerr v. Screen Extras Guild, Inc.*, 526 F.2d 67, 70 (9th Cir. 1975)).[1]

[1] The requested Attorneys' Fees and Costs stem from negotiations between Class Counsel and the County of Los Angeles, and are much lower than the fees calculated under the lodestar method. The calculated fees, without any multiplier, are $1,526,628.00 and the costs expended are $47,903.05, for a total of $1,574,531.05, which is $349,531.05 greater than the amount negotiated by the Settlement. Since this case involved injunctive and declaratory relief, the Fee award will not result in an "inequity" between Counsel and Class Members. *See In re HP Inkjet Printer Litig.*, 11-16097, --- F.3d ----, 2013 WL 1986396, *1, *5 (9th Cir. May 15, 2013) (reasoning that "coupon" settlements may create inequity where Class Counsel request fees and

10. The Court further finds that Counsel has submitted sufficient evidence of the time and effort undertaken by Class Counsel in prosecuting and settling the claims, and that this time and effort was reasonable and necessary in light of the needs of the litigation.

In accordance with the terms of the Agreement, the County of Los Angeles shall pay attorneys' fees and reimbursement of litigation costs to Class Counsel in the amount of $1,225,000 within ninety (90) days of this Order (September 9, 2013) and up to $75,000 for monitoring the Agreement within six (6) years of this Order.

IT IS SO ORDERED.

DATED: June 10, 2013

FOR PUBLIC RELEASE

CONSUELO B. MARSHALL
UNITED STATES DISTRICT JUDGE

costs).

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

CESSY LAUDERDALE, CORNELIO VERA, and BERTHA DAVIS, individually and on behalf of the class of similarly situated individuals, Plaintiffs, v. CITY OF LONG BEACH, a public entity, LONG BEACH POLICE DEPARTMENT, a public entity, Defendants.	CASE NO.: CV 08-979 ABC (JWJx) ORDER RE: ATTORNEY FEES AND COSTS

Plaintiffs Cessy Lauderdale, Cornelio Vera, and Bertha Davis, on their behalf and on behalf of similarly situated individuals, filed a motion on November 23, 2009, for reasonable attorney's fees and costs following the parties' settlement of this class action lawsuit. Defendants City of Long Beach and the Long Beach Police Department (the "City") opposed on December 14, 2009 and Plaintiffs replied on December 22, 2009. The Court found this matter appropriate for resolution without oral argument and vacated the January 11, 2010 hearing date. Fed. R. Civ. P. 78; Local Rule 7-15. Upon

consideration of the parties' papers and the case file, the Court rules as follows.

I. **BACKGROUND**

On February 13, 2008, Plaintiffs filed this class action lawsuit against the City, alleging that the City had violated the rights of people who are deaf or hard of hearing who have interacted, currently interact, or will interact with the Long Beach Police Department ("LBPD"), by failing to take appropriate steps to effectively communicate with these individuals. The Complaint sought declaratory and injunctive relief compelling the City to ensure effective communication with individuals who are deaf or hard of hearing through the provision of auxiliary aids and services and proper training of LBPD officers on how to effectively communicate during official interactions.

The Complaint and the motion for preliminary approval of the class action settlement set forth the underlying facts in this matter, and the Court need not summarize them here.

The parties ultimately entered a Settlement Agreement resolving Plaintiffs' claims under Title II of the Americans with Disabilities Act ("ADA"), Section 504 of the Rehabilitation Act, the Unruh Civil Rights Act (Cal. Civ. Code §§ 51 et seq.), and the Blind and Other Physically Disabled Persons Act (Cal. Civ. Code §§ 54 et seq.). The Agreement provides that, among other relief: (1) the LBPD will take appropriate steps to ensure effective communication with the class through the provision of auxiliary aids and services; (2) the LBPD will implement and follow a policy entitled "Communication with People who are Deaf or Hard of Hearing"; (3) the LBPD will make available Video Relay Service/Video Interpreting equipment at the main LBPD

station within one year after final approval of the agreement for a minimum one-year period; and (4) the LBPD will train personnel on the Settlement Agreement and policy. In the Agreement, the City conceded that Plaintiffs were prevailing parties for the purpose of attorney's fees. The parties agreed that Plaintiffs would apply to the Court for a determination of the amount of fees.

Although the parties ultimately reached a settlement, Plaintiffs portray the negotiations as unnecessarily drawn out by the City, while the City claims the negotiations were protracted by Plaintiffs, especially because the City knew that prolonging the matter could expose it to more in fees. In reality, the negotiations fell somewhere in the middle.

Before Plaintiffs filed suit, they sent a tort claims letter to the City in early 2007, which the City rejected. (Parks Decl. ¶ 20.) Plaintiffs sent another detailed letter to the City in January 2008, which was again rejected by the City. (Id. ¶ 20, Exs. H, I.) Plaintiffs then filed suit in February 2008.

The Court suggested settlement of the case at a June 16, 2008, conference with the parties and the first step to that settlement was to negotiate the policy that the City would eventually adopt. The City began the process with the first of three attorneys, Principle Deputy City Attorney Belinda Mayes. (Parks Decl. ¶ 21; Fudge Decl. ¶ 4.) But Ms. Mayes left the City Attorney's Office in October 2008 and this matter was reassigned to Principal Deputy City Attorney Monte Machit, who met with Plaintiffs' counsel on December 15, 2008. Machit informed Plaintiffs' counsel that the matter would be transferred again to Deputy City Attorney Randall C. Fudge, who worked on the matter from that time to the present. (Parks Decl. ¶ 22; Fudge Decl.

¶ 8.) Plaintiffs claim that, during these transitional periods, progress on settlement slowed.

Nevertheless, progress was made on the policy by January 2009 (which the LBPD began implementing), so the parties turned their attention to the Settlement Agreement itself, setting up a series of four meetings at the City Attorney's office in Long Beach. (Parks Decl. ¶ 23.) The preliminary drafts of the agreement exceeded twenty pages and the City objected to several terms, as did Plaintiffs, so "a significant amount of time was expended in re-drafting portions of the Settlement Agreement." (Fudge Decl. ¶ 8; Parks Decl. ¶ 24, Ex. L (letter from Attorney Fudge noting that the negotiations were "a laborious process involving multiple revisions of a 20-some page agreement."). Nevertheless, the parties eventually agreed on most of the issues. (Fudge Decl. ¶ 9.) The remaining issues were submitted to a five-hour mediation on June 4, 2009, and an agreement on injunctive and declaratory relief was reached in principle and the amount of damages settled on. (Parks Decl. ¶ 25.) From October 2008 through July 2009, the parties exchanged at least ten drafts of the proposed Settlement Agreement. (Parks Decl. ¶ 27.)

But a final agreement was not immediately forthcoming. Each side claims that the other sought to change, amend, or renegotiate some of the terms agreed to after the mediation, including aspects of the policy the LBPD had already implemented. (Compare Parks Decl. ¶ 26 ("Although Plaintiffs' counsel believed they had an agreement in principle on the few remaining issues regarding injunctive and declaratory relief at the parties' mediation, Defendants' counsel sought to renegotiate a number of issues that were previously negotiated and agreed upon by the parties.") with Fudge Decl. ¶ 10

("Subsequently, in or about July 2009, Plaintiffs sought to amend the Policy by adding terms to the Policy contained in the Settlement Agreement.").) After much negotiation, the parties finally agreed that the City would issue a supplemental Training Bulletin to LBPD personnel. (Fudge Decl. ¶ 11.)

During the course of negotiations up to February 2009, the parties did not engage in discovery, other than a public records request by Plaintiffs before filing the Complaint. (Parks Decl. ¶ 28.) With discovery cut-off and class certification deadlines looming and no settlement reached, however, Plaintiffs moved forward with some discovery, which they hoped would reveal the extent of the LBPD's policies, procedures, and training, and, as a result, nudge the case closer to settlement. (Parks Decl. ¶ 29.) They served on the LBPD three sets of requests for production, two sets of requests for admissions and interrogatories, and served on the City two sets of requests for production, requests for admissions and interrogatories, and Plaintiffs deposed representatives from the LBPD and the City. (Parks Decl. ¶ 29.) The parties also exchanged correspondence in setting the deposition dates, which were moved several times. (Parks Decl. ¶ 30.) Ultimately, because deadlines were still approaching, Plaintiffs drafted a class certification brief and supporting declarations, although those documents were never filed with the Court. (Parks Decl. ¶ 31.)

Having executed the Settlement Agreement and presented it to the Court for approval, Plaintiffs now seek attorney's fees and costs for the work performed. Plaintiffs claim reasonable fees in the amount of $429,282.50 as calculated under the lodestar method, multiplied by 1.5 to reflect the inherent risk in the case and the results achieved, for

a total of $643,923.75. They also seek $10,378.95 in costs and $51,024.50 for the hours expended on the fees motion. The City, on the other hand, claims that Plaintiffs are entitled to no more than $167,340 in attorney's fees and $7,439.79 in costs, but does not dispute that Plaintiffs are entitled to $51,024.50 for the fees motions.

II. DISCUSSION

Plaintiffs' counsel, the Disability Rights Legal Center (the "DRLC") and the private law firm of Munger, Tolles & Olsen LLP ("MTO"), seek fees and costs under several statutes as the prevailing parties: the ADA, 42 U.S.C. § 12205; the Rehabilitation Act, 29 U.S.C. § 794a(b); the California Disabled Persons Act, Cal. Civ. Code § 55; and Cal. Civ. Code § 1021.5. The lodestar fees they seek (not including fees for the fees motion and costs) are as follows:

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Attorney	Year of Graduation	Rate	Hours	Amount
DRLC				
Shawna L. Parks	1999	$525	99.00	$51,975.00
Sage Reeves	2001	$475	263.40	$125,115.00
Tiffany Green	2005	$375	225.40	$84,525.00
Matthew Strugar	2004	$400	9.60	$3,840.00
Law Clerks		$165	81.80	$13,497.00
Subtotal DRLC			679.20	$278,952.00
MTO				
Kristina Wilson	2006	$350	263.60	$92,260.00
Bethany Woodard	2005	$395	118.70	$46,886.50
Robert Dell Angelo	1992	$550	9.90	$5,445.00
Law Clerks/Support Staff		$65 to $220	30.60	$5,739.00
Subtotal MTO			422.80	$150,330.50
Total Lodestar			1102.00	$429,282.50
with 1.5 Multiplier				$643,923.75

Generally, a prevailing party "'should ordinarily recover an attorney's fee unless special circumstances would render such an award unjust.'" Barrios v. Cal. Interscholastic Fed'n, 277 F.3d 1128, 1134 (9th Cir. 2002) (quoting and applying standards from Hensley v. Eckerhart, 461 U.S. 424, 429, 103 S. Ct. 1933, 1937, 76 L. Ed. 2d 40 (1983) to ADA claim); see also Armstrong v. Davis, 318 F.3d 965, 970-71 (9th Cir. 2003) (applying standard to ADA and Rehabilitation Act claims); Molski v. Arciero Wine Group, 164 Cal. App. 4th 786, 790, 79 Cal. Rptr. 3d 574, 577-78 (Ct. App. 2008) (interpreting Cal. Civ.

Code § 55). The City agreed in the Settlement Agreement that Plaintiffs were "prevailing parties" here, which is consistent with controlling authority See Barrios, 277 F.3d at 1134 ("Under applicable Ninth Circuit law, a plaintiff 'prevails' when he or she enters into a legally enforceable settlement agreement against the defendant[.]"); see also Estrada v. FedEx Ground Package Sys., Inc., 154 Cal. App. 4th 1, 16-17, 64 Cal. Rptr. 3d 327, 340-41 (Ct. App. 2007) (finding that disability class action obtaining awards for 209 drivers satisfied the "significant benefit," "public interest," and "large class of persons" requirements of section 1021.5).

Once a party is considered "prevailing," the Court must determine the reasonable amount of fees by calculating the "lodestar," which is the number of hours reasonably spent multiplied by a reasonable hourly rate. Hensley, 461 U.S. at 433, 103 S. Ct. at 1939; Moreno v. City of Sacramento, 534 F.3d 1106, 1111 (9th Cir. 2008); Camacho v. Bridgeport Fin., Inc., 523 F.3d 973, 978 (9th Cir. 2008). The lodestar amount is also the touchstone for reasonable fees under California law. See Graham v. DaimlerChrysler Corp., 34 Cal. 4th 553, 579, 21 Cal. Rptr. 3d 331, 157 (2004). The lodestar is presumed to provide reasonable fees, but "the district court may, if circumstances warrant, adjust the lodestar amount to account for other factors which are not subsumed within it." Camacho, 523 F.3d at 978 (quoting Ferland v. Conrad Credit Corp., 244 F.3d 1145, 1149 n.4 (9th Cir. 2001)). To make adjustments following calculation of the lodestar, the Court considers the following factors:

> (1) the time and labor required, (2) the novelty and difficulty of the questions involved, (3) the skill requisite to perform the legal service properly, (4) the preclusion of other employment by the attorney due to acceptance of the case, (5)

> the customary fee, (6) whether the fee is fixed or contingent, (7) time limitations imposed by the client or the circumstances, (8) the amount involved and the results obtained, (9) the experience, reputation, and ability of the attorneys, (10) the "undesirability" of the case, (11) the nature and length of the professional relationship with the client, and (12) awards in similar cases.

Morales v. City of San Rafael, 96 F.3d 359, 363-64 & n.8 (9th Cir. 1996) (quoting Kerr v. Screen Guild Extras, Inc., 526 F.2d 67, 70 (9th Cir. 1975)), amended by 108 F.3d 981, 981 (9th Cir. 1997). The Court must explain how it reached the ultimate amount of fees awarded, although that explanation can vary somewhat in its level of detail depending on the magnitude of the variation from the amount requested and the amount awarded. See Moreno, 534 F.3d at 1111 (noting that "the district court can impose a small reduction, no greater than 10 percent - a 'haircut' - based on its exercise of discretion and without a more specific explanation.").

A. Lodestar Amount

Before applying any multiplier requested by Plaintiffs (which the Court will discuss below), Plaintiffs claim a lodestar of $429,282.50. (See Parks Reply Decl., Ex. A.)

1. Reasonable Hourly Rates

Reasonable hourly rates are based upon the "prevailing market rates in the relevant community, regardless of whether plaintiff is represented by private or nonprofit counsel." Blum v. Stenson, 465 U.S. 886, 895, 104 S. Ct. 1541, 1547, 79 L. Ed. 2d 891 (1984). The relevant community is the "forum in which the district court sits." Barjon v. Dalton, 132 F.3d 496, 500 (9th Cir. 1997). And the prevailing rate is the "'rate prevailing in the community for similar work performed by attorneys of comparable skill, experience, and

reputation.'" Id. at 502 (citation omitted). "Affidavits of the plaintiffs' attorney and other attorneys regarding prevailing fees in the community, and rate determinations in other cases, particularly those setting a rate for the plaintiffs' attorney, are satisfactory evidence of the prevailing market rate." United Steelworkers of Am. v. Phelps Dodge Corp., 896 F.2d 403, 407 (9th Cir. 1990).

Plaintiffs seek fees based upon the following prevailing rates in this District:

- $375/hour for Tiffany Green of DRLC, a 2005 graduate of University of California, Los Angeles School of Law;
- $475/hour for Sage Reeves of DRLC, a 2001 graduate of University of California, Davis School of Law;
- $525/hour for Shawna L. Parks of DRLC, a 1999 graduate of Boalt Hall School of Law at the University of California, Berkeley;
- $400/hour for Matthew D. Strugar of DRLC, a 2004 graduate of University of Southern California School of Law;
- $395/hour for Bethany Woodard of MTO, a 2005 graduate of University of Southern California School of Law;
- $350/hour for Kristina Wilson of MTO, a 2006 graduate of Northwestern University School of Law;
- $550/hour for Robert Dell Angelo, a partner of MTO and a 1992 graduate of University of California, Los Angeles School of Law; and
- $165/hour and $220/hour for law clerks at DRLC and MTO, respectively.

Plaintiffs have presented ample evidence that the rates they seek are reasonable in the Central District. Laurence W. Paradis, an experienced civil rights litigator and the Executive Director and Co-Director of Litigation of Disability Rights Advocates in Berkeley, California, testified that he is familiar with the DRLC and its attorneys and opined that the rates sought are consistent with market rates for attorneys with similar experience in the Southern California

market, and are consistent with the rates charged by his organization. (Paradis Decl. ¶¶ 6-12.) Barrett S. Litt, another experienced civil rights litigator, also testified that the rates are in line with the Southern California market, his own experience, and fee awards in similar cases. (Litt Decl. ¶¶ 26-31.) Three other experienced civil rights litigators also submitted declarations all attesting that the rates Plaintiffs charge are consistent with market rates in Southern California. (See Stormer Decl. ¶¶ 8-13; Mann Decl. ¶¶ 15-19; Harris Decl. ¶¶ 12-16.)

Indeed, two large law firms in the Los Angeles area - O'Melveny & Myers and Gibson, Dunn & Crutcher - charge similar rates for attorneys with equivalent experience. In 2008, O'Melveny & Myers charged $450 per hour for a 2005 graduate (as compared to the $395 per hour for MTO's Bethany Woodard, also a 2005 graduate) and charged $675 per hour for a 1994 partner (as compared to $550 per hour for MTO partner Robert Dell Angelo, a 1992 graduate). (Litt Decl. ¶ 21.) In a case in which Gibson, Dunn & Crutcher partnered with the Los Angeles public interest law firm of Public Counsel, that firm charged $525 per hour for a 2004 graduate and $495 per hour for 2005 graduates. (Litt Decl. ¶ 23.) Finally, Mr. Paradis testified that his organization charges $375 per hour for its 2005 graduates and $420 per hour for its 2004 graduates. (Paradis Decl., Ex. A.)[1]

Once the prevailing party provides evidence of the prevailing

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[1]Although Mr. Paradis's organization is located in San Francisco, he opined that rates there and in Southern California are similar. The City offered no contradictory evidence. See Bouman v. Block, 940 F.2d 1211, 1236 (9th Cir. 1991) (accepting testimony of litigator and expert on attorney's fees that market rates in San Francisco and California are similar).

market rates, "'[t]he party opposing the fee application has the burden of rebuttal that requires submission of evidence to the district court challenging the accuracy and reasonableness of the . . . facts asserted by the prevailing party in the submitted affidavits.'" Camacho, 523 F.3d at 980 (citation omitted; ellipsis in original). To carry this burden, the City offers the testimony of Andre Jardini, a legal auditor who provided an audit report on Plaintiffs' fee request, to show that Plaintiffs' counsel's rates are inflated.[2] He explained:

> Based on an Incisive Legal Intelligence publication entitled "The Survey of Law Firm Economics 2009 Edition", the average hourly billing rate for an attorney with 8 to 10 years of experience is $272. The lower quartile is $212 and the upper quartile $325. The average hourly rate for attorneys with five years experience like Matthew D. Strugar is $231 an hour and attorneys with two to three years experience like Tiffany Green average $186 hourly rate.

(Jardini Decl. ¶ 35.) The Court does not find Mr. Jardini's position persuasive. He does not include copies of the survey he cites and he

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[2]Plaintiffs filed objections to the report of Andre E. Jardini in support of the City's opposition to the motion for attorney's fees. Plaintiffs claim he is not qualified as an "expert" under Federal Rule of Evidence 702 and Daubert v. Merrell Dow Pharmaceuticals, Inc., 509 U.S. 579, 113 S. Ct. 2786, 125 L. Ed. 2d 469 (1993). Generally, under Rule 702, the Court acts as a gatekeeper before expert evidence goes to a jury, but "[t]here is less need for the gatekeeper to keep the gate when the gatekeeper is keeping the gate only for himself." United States v. Brown, 415 F.3d 1257, 1269 (11th Cir. 2005). "Thus, where the factfinder and the gatekeeper are the same, the court does not err in admitting the evidence subject to the ability later to exclude it or disregard it if it turns out not to meet the standard of reliability established by Rule 702." In re Salem, 465 F.3d 767, 777 (7th Cir. 2006). Plaintiffs mostly disagree with the substance of Mr. Jardini's conclusions, which the Court addresses infra as they are relevant to the Court's rulings. To the extent that any part of his testimony does not meet the standard of Rule 702, the Court has not considered it. The Court overrules Plaintiffs' other objections.

does not explain the methodology the authors of the survey might have used to arrive at the "average" billing rate. The survey could very well have included rates that encompassed all types of lawyers from solo practitioners to partners at the largest law firms and could have covered the entire country. That, of course, runs contrary to the requirement that reasonable rates be set at the "'rate prevailing in the community for similar work performed by attorneys of comparable skill, experience, and reputation.'" See Barjon, 132 F.3d at 500, 502.

Mr. Jardini proposes a "blended rate" of $300 per hour, but again he does not explain how he reached this blended rate, which does not even seem to correlate with the survey he cited. (Jardini Decl. ¶ 36.) Nor does he cite any legal authority for using a blended hourly rate, which may not reflect a reasonable rate. Cf. S.E.C. v. Goren, 272 F. Supp. 2d 202, 208 (E.D.N.Y. 2003) (rejecting use of blended hourly rate because it "risks under- and over-compensating [attorneys] for their efforts."). The Court finds this evidence insufficient to rebut Plaintiffs' proposed rates and concludes that those rates are reasonable.

2. Reasonable Hours Expended

Plaintiffs' counsel spent a total of 1,102 hours litigating this case (not including hours spent on the fees motion), which Plaintiffs claim is reasonable. (Parks Reply Decl., Ex. A.)[3] Plaintiffs' counsel arrived at that number after making discrete deductions from their hours equal to twenty percent. (Parks Decl. ¶ 33, Ex. A.)

[3]This number reflects Plaintiffs' subtraction of 4.2 hours from their initial total (3.7 from the hours spent by Tiffany Green and .5 hours spent by Sage Reeves) based on conceded billing errors. (Parks Reply Decl. ¶ 5.)

Further, eighty percent of the hours expended were spent by attorneys at the associate level (and thus had lower billing rates) and that number increases to ninety percent once support staff and law clerks are included. (Parks Decl. ¶ 32, Ex. A.)

a. Reduction for MTO's Involvement

First, the City argues that all the work done by the MTO attorneys was duplicative and unnecessary, so the 446.70 hours billed by the MTO attorneys should be excluded entirely from the reasonable hours spent on the litigation. (Jardini Decl. ¶¶ 26-32, 49.) Generally, billed time that includes unnecessary duplication of effort should be excluded from the lodestar. See Herrington v. County of Sonoma, 883 F.2d 739, 747 (9th Cir. 1989). Indeed, "courts ought to examine with skepticism claims that several lawyers were needed to perform a task, and should deny compensation for such needless duplication as when three lawyers appear for a hearing when one would do." Democratic Party of Wash. State v. Reed, 388 F.3d 1281, 1286 (9th Cir. 2004) (internal citations omitted). Nevertheless, "[c]ommon experience indicates that lawyers often hire other lawyers to help them with specific issues in the case." Bouman, 940 F.2d at 1236. Of course, there is some degree of duplication that is necessary in any case, so "the court should defer to the winning lawyer's professional judgment as to how much time he was required to spend on the case; after all, he won, and might not have, had he been more of a slacker." Moreno, 534 F.3d at 1112.

Here, MTO's participation was not unnecessarily duplicative. MTO brought its highly regarded civil litigation practice to the case, relying on its years of experience litigating complex cases to help bring the case to a favorable settlement. Likewise, the DRLC is

nationally recognized as an expert in the field of disability law and undoubtedly assisted MTO attorneys on understanding the substantive aspects of disability law, which may have reduced, not increased, the number of hours MTO attorneys would have otherwise had to spend to research and understand disability law. As one DRLC attorney explained, Plaintiffs' counsel employed a "team approach at settlement meetings, leveraging the DRLC's expertise in the subject matter with the litigation skills and resources brought to bear by MTO." (Parks Reply Decl. ¶ 10.)

Mr. Jardini opines that "MTO has used this matter as a training ground for its younger associates to gain experience while providing pro bono work" (Jardini Decl. ¶ 26), but he points to nothing to suggest that the attorneys from MTO lacked competence to participate in the case or that the DRLC attorneys engaged in any sort of "training," apart from the normal supervision one would expect from experts in the substantive law at issue. In fact, were the City right, Plaintiffs could never have staffed the case appropriately no matter what they did: on the one hand, the City complains that higher-billing attorneys spent too much time on the case (Jardini Decl. ¶ 36 (claiming case was staffed in a "top heavy fashion")), but on the other hand the City criticizes the use of lower-billing MTO attorneys for alleged "training" purposes (Jardini Decl. ¶ 26). Whatever the City believes should have been the proper staffing of the case, "the district court may not set the fee based on speculation as to how other firms would have staffed the case." Moreno, 534 F.3d at 1114. Thus, the Court finds that a total elimination of the 446.70 hours spent by MTO attorneys on the case is unwarranted.

Although MTO's presence was not unnecessarily duplicative as a

general matter, Mr. Jardini points to three specific instances where utilizing multiple attorneys from both firms may have led to some duplicative work.[4] First, Mr. Jardini indicates that unidentified entries from January 23, 2008 to March 14, 2008 of MTO's billing records[5] indicate that Kristina Wilson spent 16.45 hours drafting the complaint. (Jardini Decl. ¶ 28.) Similarly, unidentified entries from February 4, 2008 to February 13, 2008, indicate that several DRLC attorneys also spent approximately 13.3 hours reviewing and revising the complaint. (Id.) The Court does find the 29.75 hours spent on the complaint were likely duplicative. The DRLC has brought two similar deaf and hard-of-hearing class action cases before this court (Parks Decl. ¶ 9), so they probably could have used at least some part of those prior complaints to save time drafting the complaint in this case. Yet, a relatively junior MTO attorney (Kristina Wilson, a 2006 graduate) spent 12.4 hours from January 23, 2008 to February 4, 2008, before DRLC attorneys seem to have reviewed any part of the draft complaint. Then another relatively junior DRLC attorney (Tiffany Green, a 2005 graduate) spent two hours reviewing and revising the complaint before she sent it to a more experienced DRLC attorney, Shawna Parks. And even after that, counsel spent an additional 11.3 hours reviewing and revising the complaint.

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[4]Mr. Jardini includes these three specific instances in his declaration. He also created a chart of billing entries that he suggests demonstrates other possible duplicate billing entries. He has not set out the information in a useful way, however, because the Court cannot tell from his list whether the two firms actually performed duplicate work.

[5]A further problem with Mr. Jardini's chart is that he does not identify the discrete billing entries he adds together to reach his cumulative totals. Neither Plaintiffs nor the Court has any way to verify the accuracy of each cumulative entry without that information.

As noted above, the DRLC brings its expertise in disability law to this case - and specifically its experience litigating deaf and hard-of-hearing class actions against municipalities - yet it apparently did not immediately lend that support to the complaint-drafting process, which likely prolonged the entire drafting process. Thus, the Court finds that the 12.4 hours spent by junior MTO associate Kristina Wilson before the DRLC attorneys reviewed the draft complaint was duplicative and unnecessary, as was the two hours DRLC junior attorney Tiffany Green spent before sending it to a more senior DRLC attorney. Although the Court is not entirely convinced that all of the remaining 15.35 hours spent by the two firms were still necessary, the City provides no basis to reduce that number further and the Court will not do so.

Second, Mr. Jardini identifies instances where multiple attorneys attended court appearances and depositions, which the City claims were overstaffed. As a general matter, "in an important class action litigation such as this, the participation of more than one attorney does not constitute an unnecessary duplication of effort." Probe v. State Teacher's Retirement Sys., 780 F.2d 776, 785 (9th Cir. 1986). Indeed, having multiple attorneys attend depositions, meetings and settlement conferences allowed counsel to contribute creative solutions, reduced the need for inter-office communications after meetings, and ameliorated disagreements over what actually went on at meetings. (Parks Reply Decl. ¶ 12.)

However, one DRLC attorney billed 5.9 hours and two MTO attorneys billed a total of eight hours for attending a deposition on April 27, 2009. (Jardini Decl. ¶ 29.) First, the Court has reviewed the actual billing records and they do not appear to correlate to Mr. Jardini's

entries. The entry for the DRLC attorney on that date reflects 6.10 hours billed for attending the deposition, not 5.9, and the entries for the MTO attorneys on that date reflect 6.5 and 3.7 hours billed, for a total of 10.2 hours, not eight hours.[6] Based on the numbers contained in the actual billing records, the Court finds duplicative the 3.7 hours spent by MTO associate Kristina Wilson, when an MTO associate with similar seniority (Bethany Woodard, a 2005 graduate) billed 6.5 hours for the deposition and DRLC attorney Sage Reeves (a 2001 graduate) billed 6.1 hours for the deposition. Having one senior attorney and one more junior attorney attend the deposition was plenty; the third junior attorney was excessive.

The Court, however, does not find that having two DRLC attorneys and one MTO attorney attend the mediation in this case was duplicative. Both Sage Reeves (again, a 2001 graduate) and Shawna Parks (a 2000 graduate) from DRLC attended the June 4, 2009, mediation, billing a total of 12.6 hours for the time preparing and attending. Kristina Wilson also billed 8.8 hours for preparing for and attending the mediation.[7] First, participation of more than one attorney at a mediation does not automatically constitute an unnecessary duplication of effort. See Kim v. Fujikawa, 871 F.2d 1427, 1435 n.9 (9th Cir. 1989). Second, the mediation was far more important in this case than the deposition discussed above. Unlike the deposition, the mediation sat at the very crossroads of the

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[6]The Court also notes that the MTO attorneys spent a total of 17.7 hours preparing for and attending the deposition, but subtracted 7.5 hours from that to arrive at 10.2 hours actually billed.

[7]Again, Mr. Jardini's calculation of eight hours for Ms. Wilson's hours billed was inaccurate based on the billing records.

resolution of this case. The parties had agreed to some terms of a settlement, but needed a neutral to finalize it. The Court hesitates to second-guess the choice of two senior DRLC attorneys to attend with the assistance of a junior MTO associate, since an agreement may not have been reached if both senior DRLC counsel had not brought to bear their expertise and experience. The Court will not subtract hours on this basis.

b. Specific Reductions for DRLC Hours

The City also seeks to reduce DRLC's hours based on improper billing for overhead, conducting excessive interoffice communication, and for committing errors within its bills.

Mr. Jardini identifies 27.05 hours he claims were improperly spent on "overhead," including "calendaring, scheduling and confirming meetings, issues regarding retainer agreements, and electronic filing." (Jardini Decl. ¶ 37.) In some circumstances, "attorneys' fees for administrative and secretarial tasks . . should be considered general overhead to run a law office," and already compensated in the reasonable hourly fee, Eklund v. City of Seattle, No. C06-1815Z, 2009 WL 2019119, at *4 (W.D. Wash. July 2, 2009) (citing Keith v. Volpe, 644 F. Supp. 1312, 1316 (C.D. Cal. 1986)), but only if that is the billing custom in the relevant market, see Trustees of Constr. Indus. & Laborers Health & Welf. Trust v. Redland Ins. Co., 460 F.3d 1253, 1257 (9th Cir. 2006). The City has provided no evidence that this is the practice in the Central District. Thus, the Court cannot subtract these hours on that basis.

It is clear, however, that "[i]t is simply not reasonable for a lawyer to bill, at her regular hourly rate, for tasks that a non-attorney employed by her could perform at a much lower cost." Davis

v. City & County of San Francisco, 976 F.2d 1536, 1543 (9th Cir. 1992), vacated in part on other ground by 984 F.2d 345, 345 (9th Cir. 1993); see also Redlands Ins. Co., 460 F.3d at 1257. The Court has reviewed the entries for the hours claimed to be "overhead" or administrative and finds that most of them, while not models of billing clarity, arguably require the skills of an attorney to be performed. For example, on June 14, 2007, Tiffany Green spent three-tenths of an hour responding to an email from a law clerk "re questions about Long Beach Case . . . and Section 1983 COA," which certainly entails attorney-level work. Similarly, on December 18, 2008, Sage Reeves billed one-tenth of an hour in a telephone conference with the City's counsel Randall Fudge "re scheduling," which also could require an attorney's experience, especially if the scheduling issue was disputed. On September 21, 2009, Sage Reeves billed two-tenths of an hour for "Legal research re filing with Court re need for settlement conference/extension," which again, is obviously attorney-level work. And several entries reflect work performed by Tiffany Green on retainer agreements, which also entails attorney skill.

Not every entry identified needed an attorney to perform it, however. For example, on July 2, 2007, Tiffany Green spent one-tenth of an hour emailing "Cessy Lauderdale – re videophone," which the Court suspects was intended to set up videoconferencing and required no attorney-level skill. On January 25, 2008, Tiffany Green billed .05 of an hour with the entry "Gave to SAC to be mailed off with a check for 20.00," which certainly could have been done by a non-attorney. Similarly, several times Ms. Green simply forwarded electronic notices sent by the Clerk's office when a document is

electronically docketed, yet she charged one-tenth of an hour each time. On June 3, 2009, Sage Reeves spent .2 of an hour drafting an "email to clients re mediation location and directions," which appears to entail nothing but logistics. And in September and October of 2009, an unidentified attorney by the initials of "M.D." (who the court presumes is Matthew D. Strugar, who bills at $400 per hour) spent half an hour "preparing" to mail declarations and cover letters to the named Plaintiffs, spent .6 of an hour compiling and assembling exhibits for the declaration of Barrett Litt, and spent .9 of an hour compiling documents for the fee motion and settlement approval, none of which required an attorney's skill, and especially not one at $400 an hour.

Rather than chronicle every improper entry here, the Court has reviewed the entries Mr. Jardini identified as "overhead" and deducts 3.65 hours spent on clerical and administrative work that were improperly billed at attorney rates.[8]

Next, the City claims that the DRLC attorneys spent an excessive 73.5 hours conferring among themselves and an excessive 56.6 hours conferring with MTO attorneys. Mr. Jardini proposes - without legal authority or factual support - that the 73.5 hours be reduced by half to 36.75 and the 56.6 hours be eliminated entirely.[9] The Court will

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[8]The Court notes that, on June 10, 2008, a law clerk billed 6.3 hours for "Discovery matter: indexed defendant's initial disclosures." That task could have reasonably required the expertise of a law clerk or paralegal, especially if some sort of summary or analysis of the documents was required. Thus, it was compensable at the law clerk rate of $165 per hour.

[9]On the hours spent conferring with MTO attorneys, the Court only presumes Mr. Jardini proposes eliminating the hours entirely, based on the summary chart included in his declaration (Jardini Decl. ¶ 49)

(continued...)

not do so.

There is nothing inherently wrong with conferencing with co-counsel in a case; in fact, "conferences between attorneys to discuss strategy and prepare for oral argument are an essential part of effective litigation." McKenzie v. Kennickell, 645 F. Supp. 437, 450 (D.D.C. 1986) ("Such supervision is necessary to avoid wasteful or disorganized efforts by inexperienced lawyers keeping fee claims within reasonable bounds."); see also Berberena v. Coler, 753 F.2d 629, 632-33 (7th Cir. 1985) (finding compensable the hours attorneys "spent mostly in consultation, negotiation, and on the telephone," which "were of key importance to obtaining the consent decree" in the case). Conferences are especially important in cases like this one, where more junior attorneys took the laboring oar while more senior attorneys supervised, because "meetings between junior and senior lawyers to discuss the progress of research and review completed assignments are reasonable and appropriate means to secure proper supervision and efficient staffing of large class actions cases such as this." McKenzie, 645 F. Supp. at 450.

Moreover, the total number of hours the City complains were excessively spent on consultation - 130.1 - amounts to just under twelve percent of the total 1102 hours spent. Given that the parties conducted only limited discovery, no motion work, and the case settled before going to trial, it is unremarkable that conferences accounted for this proportion of time. The City provides no cogent reason why

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[9](...continued)
because his actual testimony in this section of his declaration is unintelligible (Jardini Decl. ¶¶ 43-44).

this amount of conferencing was excessive, and the Court finds none.[10] See Prison Legal News v. Schwarzenegger, 561 F. Supp. 2d 1095, 1104 (N.D. Cal. 2008) (rejecting request to reduce fees by eight percent for excessive conferences because "Defendants have provided no evidence or argument that any conference was excessive or duplicative.").

Next, the City points out several entries it claims are the result of duplicative billing errors and requests a reduction of 10.3 hours. The DRLC attorneys conceded that 3.7 hours were billed by Tiffany Green in error and half an hour was billed by Sage Reeves in error (and those deductions are already reflected in the 1102 hours sought by Plaintiffs). They argue that the other entries were correct for a simple reason: the same attorney can work on the same task at two separate times in a single day. Indeed, all the remaining "errors" that Mr. Jardini points out appear to fall within that category, and, in some instances, even reflect different amounts of time spent on the same task. The Court finds Plantiffs' explanation reasonable and will not deduct the remaining 6.1 hours from the total hours spent.

Finally, the City argues that the DRLC spent an excessive number of hours drafting the settlement agreement in this case, which Mr. Jardini calculates at 46.4 hours. Mr. Jardini instead suggests that the proper number should be twenty-four hours because the settlement in this case was similar to the settlement agreement in a similar case litigated before this Court. See Valenzuela v. County of Los Angeles,

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[10]Even the City's own expert, Mr. Jardini, opined in another case that conferences among co-counsel are not unreasonable, but beneficial to a case. (Parks Reply Decl., Ex. E at 7-8.)

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The Court rejects the request for several reasons. First, Mr. Jardini provides no explanation of how he arrived at the 46.4 hours, so the Court cannot tell whether that number accurately reflects only hours spent on drafting, or included hours spent on any other tasks related to the settlement agreement, such as research, conferences, consultation with clients, etc., and these tasks were obviously unique to this case. Second, while Mr. Jardini suggests that the hours were excessive because the DRLC attorneys could have simply copied portions of the settlement agreement in Valenzuela, Plaintiffs submit a detailed declaration from DRLC attorney Shawna Parks explaining that the negotiations over the contents of the settlement agreement here reflected "the needs of this case, including operational aspects of the LBPD, the specific problems encountered by people who are deaf or hard of hearing and who have interacted with the LBPD, and advances in technology since the Valenzuela settlement." (Parks Reply Decl. ¶ 6.) The Court has reviewed the two agreements and notes that the settlement agreement here was not simply a carbon copy of the settlement in Valenzuela and it is unsurprising that the parties spent a substantial amount of time finalizing it. (Parks Reply Decl. ¶¶ 7-9.) Thus, the Court declines to subtract any hours for this work.

c. Total Hours Deducted

The Court concludes that Plaintiffs reasonably spent 1080.25 hours on the case, which reflects the following deductions from Plaintiffs' proposed 1102 hours:

- - 12.4 hours spent by MTO associate Kristina Wilson on drafting the complaint;
- - 3.7 hours spent by MTO associate Kristina Wilson to prepare for and attend the April 27, 2009, deposition;

- \- 2 hours spent by DRLC attorney Tiffany Green on the complaint; and
- \- 3.65 hours spent as clerical and administrative work, 1.45 of which was billed by Tiffany Green, .2 billed by Sage Reeves, and two of which were billed by attorney Matthew D. Strugar.

4. Total Lodestar Amount

Based on the above analysis, the Court calculates the lodestar amount as $421,458.75, which is broken down as follows:

Attorney	Year of Graduation	Rate	Hours	Fees	Notes
DRLC					
Shawna L. Parks	1999	$525	99.00	$51,975.00	
Sage Reeves	2001	$475	263.20	$125,020.00	Reflects .2 hour reduction
Tiffany Green	2005	$375	221.95	$83,231.25	Reflects 3.45 hour reduction
Matthew Strugar	2004	$400	7.60	$3,040.00	Reflects 2 hour reduction
Law Clerks		$165	81.80	$13,497.00	
Subtotal DRLC			673.55	$276,763.25	
MTO					
Kristina Wilson	2006	$350	247.50	$86,625.00	Reflects 16.1 hour reduction
Bethany Woodard	2005	$395	118.70	$46,886.50	
Robert Dell Angelo	1992	$550	9.90	$5,445.00	
Law Clerks/Support Staff		$65 to $220	30.60	$5,739.00	
Subtotal MTO			406.70	$144,695.50	
Total Lodestar			1080.25	$421,458.75	

B. Use of a Multiplier

Plaintiffs seek to apply a multiplier of 1.5 to the lodestar amount under California law "to account for the contingent risk of the litigation and the extraordinary results achieved." Even though a multiplier is not available under federal fee-shifting statutes based

upon the contingency nature of a case, the Ninth Circuit has held that when a plaintiff is entitled to fees for both federal and California state claims, a federal court may apply a contingency multiplier under California law. See Mangold v. Cal. Pub. Util. Comm'n, 67 F.3d 1470, 1478–79 (9th Cir. 1995).[11] To determine whether a multiplier is appropriate, the Court considers factors similar to those considered under federal law, such as "the novelty and difficulty of the issues presented, the quality of counsel's services, the time limitations imposed by the litigation, the amount at stake, and the result obtained by counsel." City of Oakland v. Oakland Raiders, 203 Cal. App. 3d 78, 83, 249 Cal. Rptr. 606, 609 (Ct. App. 1988).

While this case involves important issues and Plaintiffs obtained substantial relief, Plaintiffs are not entitled to a multiplier. The case was not particularly difficult, given that the parties never needed to litigate applicable legal standards and the city all but conceded liability at the outset of the lawsuit. Likewise, the DRLC has reached settlements in at least two other similar cases against municipalities. (Parks Decl. ¶ 9.) Furthermore, the lion's share of the work in this case was spent on negotiating a settlement agreement. Negotiations began early in the case and enabled the parties to avoid

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[11]Even under federal fee-shifting statutes, the Court may adjust the lodestar in light of additional considerations, including the results obtained. Hensley, 461 U.S. at 434. However, a "strong presumption" exists that the lodestar figure represents a "reasonable fee" and should be enhanced only in "rare and exceptional cases." Pennsylvania v. Delaware Valley Citizens' Council for Clean Air, 478 U.S. 546, 565 (1986). To overcome the strong presumption that the basic fee is reasonable, the fee applicant bears the burden of coming forward with "specific evidence" that the lodestar amount is unreasonably low. See Van Gerwen v. Guarantee Mut. Life Co., 214 F.3d 1041, 1045 (9th Cir. 2000) (citing Delaware Valley, 478 U.S. at 565). This showing must be based on factors not already subsumed in the lodestar calculation. Id.

motion work and most discovery. Counsel was certainly well-equipped to bring the case to a favorable resolution for Plaintiffs and the class, but the reasonable hourly rates to which Plaintiffs' attorneys are entitled more than adequately account for the quality of counsel's representation. See Morales, 96 F.3d at 363-64 (noting that the Court may adjust lodestar figure "on the basis of the Kerr factors that are not already subsumed in the initial lodestar calculation."). The Court also appreciates that Plaintiffs' counsel may have had to forego some other clients to pursue this case, but once again that fact is adequately reflected in the lodestar amount. See id.

Plaintiffs cite Beasley v. Wells Fargo Bank, 235 Cal. App. 3d 1407, 1419, 1 Cal. Rptr. 2d 459, 466 (Ct. App. 1991), overruled on other grounds by Olson v. Auto. Club of S. Cal., 42 Cal. 4th 1142, 1151, 74 Cal. Rptr. 3d 81, 87 (2008), to argue that the purpose of using a contingency risk multiplier "is to compensate for the risk of loss generally in contingency cases as a class," (emphasis in original), and such a risk is present in disability class action cases (Parks Decl. ¶¶ 34-37; Stormer Decl. ¶ 15). Yet, the DRLC has brought several cases involving deaf or hard-of-hearing individuals against public entities and those cases have settled, suggesting the risks in these specific types of cases are not so high that a multiplier is necessary to assure class action plaintiffs obtain representation.[12]

The Court has already calculated the lodestar amount at over $400,000, more than twice the amount of fees to which the DRLC agreed in the Valenzuela case. The Court recognizes that the settlement here

[12]The Court notes as well that the lodestar amount of fees, including any enhancement, assessed against the City would fall on the taxpayers. See Serrano v. Priest, 20 Cal. 3d 25, 49, 141 Cal. Rptr. 315, 328 (1977).

was harder-fought than the one in Valenzuela and some of the issues raised in this case were different from those in Valenzuela, but those differences are adequately reflected in the lodestar. Applying a multiplier on top of that is unwarranted.

C. Reasonable Costs

Plaintiffs also seek reimbursement for costs expended in the litigation in the amounts of $2,367.25 to the DRLC and $8,011.70 to MTO. (Parks Decl., Ex. A.) The City does not dispute that Plaintiffs are entitled to costs generally. See 42 U.S.C. § 12205; Cal. Code Civ. Proc. § 1032(b). Nor does the City dispute that the DLRC should recover the full $2,367.25 it seeks. Thus, the Court awards the DRLC its full $2,367.25 in costs.

The City does dispute the amount sought by MTO, however.[13] Mr. Jardini identifies two possible duplicate entries on the costs billing records submitted by MTO: (1) a duplicate charge of $30 for a filing fee on June 25, 2008; and (2) a duplicate charge on March 10, 2009, for a court reporter for a deposition to occur on April 27, 2009. As to the first charge, it appears that the entries were not for "filing fees," but each was for a "Certified Case Records Request" to the Superior Court. It is possible that these two entries are not duplicates, but two separate requests. But Plaintiffs were unable to respond to the City's argument because they belatedly filed a notice of errata and supplemental submission to which the City appropriately responded after briefing had otherwise concluded. Therefore, the

[13]In their initial request, Plaintiffs omitted the itemized list of costs for MTO. Following the City's filing of its opposition, Plaintiffs recognized the error and filed an errata including the missing information. The City then filed a supplemental declaration from Mr. Jardini analyzing the costs.

Court accepts the City's explanation and subtracts $30 from MTO's costs.

MTO's costs billing records also include a duplicate charge for a court reporter at a deposition on April 27, 2009. MTO's records reflect that Kristina Wilson paid $1,143.22 to Barkley Court Reporters on March 10, 2009, in advance of a deposition scheduled on April 27, 2009. A second entry on July 23, 2009, reflects that MTO attorney Bethany Woodard also paid $1,143.22 to Barkley Court Reporters for a deposition on April 27, 2009. Both entries share the same invoice number of 368523 and nothing in the entries indicates that they were intended to be separate payments. Again, because Plaintiffs' notice of errata and the City's response came after the close of briefing and Plaintiffs provided no explanation of the duplication, the Court can only conclude that these entries were in fact duplicative. Thus, the Court subtracts $1,143.22 from MTO's costs and awards a total of $6,838.48 in costs expended by MTO.[14]

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[14]Mr. Jardini also renews his opinion that MTO's involvement in the case was unnecessary and duplicative, and therefore subtracts costs from MTO's costs billing records to arrive at a total of $5,072.54. For the reasons discussed supra, the Court rejects his position that MTO attorneys were entirely unnecessary to the case and declines to subtract any costs on that basis.

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C. Fees for the Fees Motion

Plaintiffs also seek fees for the time spent on the fees motion:

Attorney	Year of Graduation	Rate	Hours	Fees
DRLC				
Shawna L. Parks	1999	$525	35.10	$18,427.50
Matthew Strugar	2004	$400	21.50	$8,600.00
Subtotal DRLC			56.60	$27,027.50
MTO				
Kristina Wilson	2006	$350	23.80	$8,330.00
Bethany Woodard	2005	$395	36.60	$14,457.00
Robert Dell Angelo	1992	$550	2.20	$1,210.00
Subtotal MTO			62.60	$23,997.00
Total Requested			119.2	$51,024.50

The City does not dispute that Plaintiffs may recover fees for work done in litigating attorney's fees. See, e.g., Thompson v. Gomez, 45 F.3d 1365, 1366 (9th Cir. 1995). The City also does not dispute the amount presented by Plaintiffs of $27,027.50 for DRLC attorneys and $23,997.00 for MTO attorneys, for a total of $51,024.50.

The Court nevertheless feels compelled to reduce the amount of fees incurred on the fees motion by 10% for time spent on a frivolous dispute over the date of the hearing on this motion. The Court may, in its discretion, shave up to 10% off the fees sought without reviewing and commenting on billing records entry-by-entry. See In re Smith, 586 F.3d 1169, 1174 (9th Cir. 2009); Moreno, 534 F.3d at 1112. That includes deducting excessive hours spent on a fees motion. See Anderson v. Dir., Office of Workers Compensation Programs, 91 F.3d 1322, 1325 (9th Cir. 1996).

Plaintiffs originally filed this motion on November 23, 2009 and noticed the hearing for December 14, 2009. On December 1, 2009, the parties filed a stipulation with the Court purporting to move that hearing date. The stipulation did not clearly indicate which party drafted it (the document contained the City's counsel's caption, but the docket indicates that Plaintiffs' counsel filed it), but it was so deficient that the Court not only denied it, but made clear its displeasure with the parties' failures. (Docket No. 55.) The Court did, however, grant the parties the opportunity to refile it properly.

That should have been the end of the matter. But apparently the parties could no longer agree on the new hearing date, due in no small part to the Plaintiffs' obstinance. (See Docket No. 56.) To protect its interests in opposing the fees motion, on December 4, 2009, the City filed an ex parte application to set the new hearing date. In response, Plaintiffs' counsel filed a notice of non-opposition. They claimed the City acted prematurely in filing the ex parte application, but the City was right to act promptly, as the Court had already pointed out that the City missed the previous deadline to file its opposition to the fees motion, which could have resulted in forfeiture of any chance to oppose. (See Docket No. 55.) Plaintiffs never provided a good explanation as to why they had not simply worked with the City's counsel to file a new stipulation. The Court finds that the work spent on this motion practice - which the Court calculates at approximately 10% of the total work done on the fees motion - was unnecessary and unreasonable.

Moreover, even if the motion work were not unnecessary, the hours spent on it were grossly excessive. The Court need not - and will not - chronicle every excessive hour, but a few entries are worth noting.

For example, on December 7, 2009, the date the non-opposition to the ex parte application was filed, MTO associate Kristina Wilson spent 2.6 hours, for a total cost of $910, drafting the "notice of non-opposition to defendant's ex parte application to continue hearing dates; revise and file notice of non-opposition to defendants' ex parte motion to continue hearing dates." On the same date, MTO attorney Bethany Woodard also spent some part of one hour, at a cost of $395, conferencing regarding the non-opposition, as well as revising a draft of it. And then DRLC attorney Shawna Parks spent .4 hours, at a cost of $210, "receiv[ing] and review[ing] draft non-opp to briefing schedule on fees motion, edits to same." The Court can conceive of no justification for spending four hours at a total cost of over $1,500 on a document that should have been one line (maybe two if Plaintiffs felt compelled to explain their position) indicating Plaintiffs did not oppose the City's request.

Similarly, MTO attorneys spent 3.6 hours on December 4, 2009, at a cost of $1,350, conferencing with each other and with opposing counsel, and researching the law on ex parte applications. Again, the Court can identify no reason why MTO associates spent nearly four hours discussing and researching the ex parte application that asked for relief that Plaintiffs had previously agreed to.

The Court has reviewed the billing records for the motion work and concludes that a 10% reduction from Plaintiffs' requested fees on the fees motion is warranted, for a total reasonable award of $45,922.05. Of that, $24,324.75 goes to MTO and $21,597.30 goes to

the DRLC, which is proportionate to each firm's share of the original total fee amount requested.[15]

III. CONCLUSION

Based on the above analysis, the Court finds that Plaintiffs are the prevailing parties entitled to reasonable attorney's fees and costs. The Court further finds that Plaintiffs' counsel's hourly rates are reasonable and, after taking the deductions from the total hours as noted above, finds the hours spent were reasonable. The Court denies Plaintiffs' request to apply a multiplier. The Court also awards reasonable costs to Plaintiffs, except those deducted above, and awards Plaintiffs the fees spent in connection with the fees motion with a 10% reduction. Thus, the Court AWARDS Plaintiffs the reasonable fees and costs in the amount of $476,586.53, which breaks down as follows:

DRLC Lodestar Fees	$276,763.25		MTO Lodestar Fees	$144,695.50
DRLC Fees on Fees	$21,597.30		MTO Fees on Fees	$24,324.75
DRLC Costs	$2,367.25		MTO Costs	$6,838.48
DRLC Total	$300,727.80		MTO Total	$175,858.73
Total Award	$476,586.53			

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[15]In other words, MTO's share of the original $51,024.50 was $27,027.50, or 53%, and the DRLC's share was $23,024.50, or 47%. The Court has used those same proportions to determine the reduced award for each firm.

Plaintiffs are ordered to lodge with the Court **within 10 days of the date of this Order** a proposed order that reflects the Court's ruling.[16]

IT IS SO ORDERED.

DATED: January 11,2010

AUDREY B. COLLINS
UNITED STATES DISTRICT CHIEF JUDGE

[16]In conjunction with this Order, the Court has also signed the proposed Order granting preliminary approval of the class action settlement and class certification. The parties should treat this Order as triggering paragraphs 9 and 10 of that Order for issuing class notice, for filing any counsel objections, and for calculating the hearing date on the final approval of the settlement, notwithstanding the Court's request here that Plaintiffs file a conforming proposed order on the attorney's fees and costs award.

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

JUAN GAMINO, individually and as class representative; KATHY CONLEY, individually and as class representative; ED FERREL, individually and as class representative, Plaintiffs, v. COUNTY OF VENTURA; VENTURA COUNTY SHERIFF BOB BROOKS, individually and in his capacity as Sheriff of Ventura County; DOES 1-10, Defendants.	CASE NO. CV-02-9785 CBM (Ex) **ORDER AWARDING CLASS COUNSEL ATTORNEYS' FEES AND COSTS**

The matter before the Court is Plaintiffs' Motion for Attorneys' Fees (the "Motion"). Upon consideration of the papers and arguments presented, the Court GRANTS Plaintiffs' Motion.

BACKGROUND

This case is a class action on behalf of new arrestees booked into in the Ventura County Jail charged with violations of California Health and Safety ("H&S") Code §11550, who were strip searched pursuant to the then policy of the Ventura County Jail to do so without individualized suspicion. The case was settled on terms enumerated in the Preliminary Approval Order and documents attached thereto, and those terms will not be repeated here.

The custom and practice that was the basis of this lawsuit was ceased as a result of the litigation in the related action, *Way v. County of Ventura*, 445 F.3d 1157 (9th Cir. 2006) (hereafter *Way*) and this case. *Way* was an individual plaintiff case, also before this Court. *Gamino* was filed separately after *Way*, as a class action. After favorable decisions in this Court and the Ninth Circuit, granting summary judgment to plaintiff *Way* on liability, *Way* was settled for a total of $575,000. Of that amount, $500,000 was for fees and costs, and the remainder was for the plaintiff.

This case subsequently settled, after extensive mediation efforts. The Court approved the settlement at a hearing held on February 2, 2009. [Doc. No. 182.] Under the settlement, defendants would pay sums to class representatives, and various sums to class members who file claims, and would pay for the cost of class administration. In addition, defendants would pay $1,400,000 in attorneys' fees and costs, subject to the approval of this Court.

Plaintiffs filed a motion for attorneys' fees seeking the $1,400,000 award agreed to, based on both a class fund theory and a lodestar with a multiplier theory. For the reasons stated below, the Court awards Plaintiffs' counsel $1,400,000 in attorneys' fees and costs.

LEGAL STANDARD

It is well settled in the Ninth Circuit that, "[i]n a common fund case, the district court has discretion to apply either the lodestar method or the percentage-of-the-fund method in calculating a fee award." *Fischel v. Equitable Life Assurance Soc'y of the U.S.*, 307 F.3d 997, 1006 (9th Cir.2002). "Reasonableness is the goal." *Id.* at 1007. To calculate an award of reasonable attorney's fees, courts use the lodestar formulation set forth in *Hensley v. Eckerhart*, 461 U.S. 424, 433 (1983), which instructs the court to take the number of hours reasonably expended on the litigation and multiply it by a reasonable hourly rate. In determining the "lodestar figure," courts must consider the *Kerr* factors:

> (1) the time and labor required, (2) the novelty and difficulty of the questions involved, (3) the skill requisite to perform the legal service properly, (4) the preclusion of other employment by the attorney due to acceptance of the case, (5) the customary fee, (6) whether the fee is fixed or contingent, (7) time limitations imposed by the client or the circumstances, (8) the amount involved and the results obtained, (9) the experience, reputation, and ability of the attorneys, (10) the "undesirability" of the case, (11) the nature and length of the professional relationship with the client, and (12) awards in similar cases.
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> *Kerr v. Screen Extras Guild, Inc.*, 526 F.2d 67, 70 (9th Cir. 1975).

DISCUSSION

A. The Time and Labor Expended By Counsel

Counsel efforts in litigating this case were substantial. The work performed included: 1) extensive investigation of the underlying circumstances, including speaking with scores of class members; 2) preparation of the complaint; 3) the Rule 26 conference and report; 4) three requests for production of documents; 5) extensive analysis of documents produced; 6) three set of interrogatories; 7) 12 depositions; 8) three discovery motions; 9) a motion to compel Sheriff Brooks' deposition; 10) three summary judgment motions; 11) two published appeals in *Way* (one remanding because appealed order was not final for purposes of appeal, and the second upholding this Court's grant of summary judgment to Plaintiff

Way); 12) preparation and mailing of first class notice (pre-settlement); 13) handling of hundreds of class members' calls after mailing of first class notice; 14) retention of data consultants and extensive analysis of computerized jail data; 15) list of charges qualifying as charges of violence, weapons or drugs for purposes of the different levels of class claims; 16) three days of unsuccessful mediation efforts with Ret. Magistrate Judge Edward Infante (including multiple mediation sessions); 17) four mediation sessions with Magistrate Judge Charles Eick; 18) preparation of a 14-page mediation letter in anticipation of mediation with Ret. United States District Judge Raul Ramirez; 19) two days of mediation sessions with Judge Ramirez; 20) and negotiation and preparation of settlement documents, including settlement agreement, preliminary and final approval orders, class notice and claim forms.

In summary, the time and efforts expended by Class Counsel were extensive and involved all that occurs in a case that is being prepared for trial.

B. The Novelty and Difficulty of the Issues and Counsel's Skill

The issues involved in this case involve complex issues of constitutional law in an area where considerable deference is given to jail officials, as the Ninth Circuit recognized in the partial summary decision in this case. *See Way v. County of Ventura, supra,* 445 F.3d at 1161 (9th Cir.2006) ("We recognize the difficulty of operating a detention facility safely, the seriousness of the risk of smuggled weapons and contraband, and the deference we owe jail officials' exercise of judgment in adopting and executing policies necessary to maintain institutional security."); *see also Craft v. County of San Bernardino*, 468 F.Supp.2d 1172, 1176 (C.D.Cal. 2006) (quoting *Way*).

The *Way* case, which provided the legal foundation for the settlement here (as the parties stipulated that the outcome of *Way* would govern liability here), involved difficult questions of constitutional law. A good snapshot of the state of

the law at the time is contained in *Way v. County of Ventura*, 445 F.3d 1157, 1159 (9th Cir.2006), where the Court provided the following summary:

> Way brought this civil rights action ... alleging that they violated her civil rights under the Fourth and Fourteenth Amendments by subjecting her to a body cavity search following her arrest. The parties both filed motions for summary judgment. The district court held that the search violated *Way*'s constitutional rights because individualized suspicion is required for arrestees who are not admitted to the general jail population. It denied qualified immunity to Brooks and Hanson on the basis of *Giles v. Ackerman*, 746 F.2d 614, 616-17 (9th Cir.1984) (per curiam), *overruled on other grounds by Hodgers-Durgin v. de la Vina*, 199 F.3d 1037, 1040 n.1 (9th Cir.1999) (en banc); *Kennedy v. Los Angeles Police Dep't*, 901 F.2d 702, 711 (9th Cir.1990) (as amended), *implied overruling on other grounds recognized by Act Up!/Portland v. Bagley*, 971 F.2d 298, 301 (9th Cir.1992); and *Fuller v. M.G. Jewelry*, 950 F.2d 1437, 1446 (9th Cir.1991), holding that a reasonable officer reviewing Ventura's policy and the established law would have recognized that the Sheriff Department's policy was unconstitutional because it did not further any legitimate penological interests. That ruling is the subject of this appeal.

What was distinct about this case and the *Way* case was that it involved strip searches of arrestees charged with a drug offense. The Ninth Circuit had ruled long before that the involvement of drugs supplied reasonable suspicion for a strip search. *See, e.g., Thompson v. City of Los Angeles*, 885 F.2d 1439, 1447 (9th Cir. 1989) (reasonable suspicion may be supplied by the nature of the charge).

Thus, the plaintiff in *Way* had to prevail on the argument that being under the influence of drugs was fundamentally different in kind from possession or trafficking in drugs and did not provide reasonable suspicion for a strip search. Plaintiff succeeded in that contention, paving the way for the current settlement. *See Way*, 445 F.3d at 1162 ("We cannot see how the charge of being under the influence of a drug necessarily poses a threat of concealing (and thereby using or trafficking) additional drugs in jail during the limited time between booking and bail, or booking and placement in the general population. If not, it was unreasonable to assume that *Way* harbored drugs in some cavity or other."). Plaintiff ultimately prevailed before the Ninth Circuit, which acknowledged it had never directly addressed the issue in deciding that the Sheriff was entitled to

qualified immunity. *Id.* ("we had never previously addressed the constitutionality of a body cavity search policy premised on the nature of this or any other drug offense. More importantly, we had held that the nature of the offense alone may provide reasonable suspicion [citation omitted], and twice pointed to charges involving drugs, contraband and violence as the kind of offense that might give rise to reasonable suspicion.").

In addition, properly handling the data in cases of this type requires a high degree of sophistication. In cases like this, proper use of the data is the factual key to the case (along with establishing the policies or customs being challenged, which occurred during the *Way* case). It is through the data that members of the class are identified. This is usually a sophisticated process, requiring counsel familiar with both the facts of the case and how to use the data. Jail data is not configured to straightforwardly answer the questions for which answers are needed to determine class composition. Code has to be written to take all of those factors into account. Then the analysis has to be discussed between Plaintiffs and Defendants, in order to work out agreement on the data issues. All of this occurred here.

There are relatively few attorneys qualified to handle the data issues in a case such as this to the maximum degree of effectiveness. When Mr. Barrett Litt came into the case, Plaintiffs had not yet undertaken an independent data analysis. After Mr. Litt's entry, data consultants he had used previously analyzed all the data. As a result, the class list changed. In addition, an entire group of individuals were identified for whom no determination could be made based on the available data as to whether they were strip searched. This is because, for the earlier part of the class period, the data only captured the lead charge, but there may have been a secondary §11550 charge on the basis of which the arrestee was strip searched.

The solution to this problem was developed through the use of the Possible Class Member mailing.

C. The Risks Of Non-Payment Assumed By Counsel and Preclusion of Other Employment

Plaintiffs' counsel faced a substantial risk of non-payment, in part because counsel took this case on a contingency fee basis. Obviously, the County had the resources to pay a judgment. However, the risk lay in establishing that the County's policies were illegal. As discussed previously, strip search litigation in general is inherently risky because of the deference given jail officials, and because there is a split in circuits developing. Seeking large amounts of money from government entities always carries risks of politics entering into the equation.

Declarations filed in support of Plaintiffs' motion for attorneys' fees from experienced class and civil rights lawyers noted several particular difficulties in litigation of this kind, including 1) particular challenges and expertise exist to establish a policy or custom under *Monell v. Dept. Soc. Serv.*, 436 U.S. 658, 690 (1978); 2) great deference is given to jails in addressing security issues; 3) the law often differs from circuit to circuit; and 4) there is a greater risk than normal that the whole legal landscape could change by virtue of a change in the law, particularly if the Supreme Court addresses the issue (which it has not done in the area of strip searches of pre-trial detainees since *Bell v. Wolfish*, 441 U.S. 520 (1979), almost 30 years ago. The Court agrees that all of these reflect risks for Plaintiffs' counsel in pursuing litigation of this type.

Class counsel, particularly Mr. Earnest Bell, declined substantial other work to pursue this case. These two cases combined (*Way* and *Gamino*) spanned many years when the outcome was uncertain. Over 2000 hours were devoted to the combined *Way* and *Gamino* cases.

D. The Result Obtained For The Class

This case was hard fought. The *Way* case, in which the key merits issues were fought out, went through extensive briefing in this Court and the Ninth Circuit. The Plaintiffs were individuals of little means. All the work was performed on a contingent fee basis. The settlement was the result of arm's length negotiations entered only after Plaintiff won the *Way* case. Even then it required over a year of settlement efforts, and the addition of Mr. Litt to Plaintiffs' attorney team, to reach a settlement.

The financial terms of the settlement are very favorable to class members. Those not charged with crimes of violence or involving other drug charges receive $2300 for a first offense and $700 for a second offense. This is considerably higher than the average recovery in other strip search class actions. (*See* B. Litt Dec. at ¶ 35, [Doc. No. 176], filed concurrently with Plaintiffs' Motion.) While this is partly explained by the scale of the other cases compared to this one, the fact remains that class members are receiving very favorable payments. In addition, even those charged with other drug charges or crimes of violence are participating in the settlement, even though the law in this Circuit is that such charges provide reasonable suspicion to strip search pre-arraignment arrestees. All of this is due exclusively to Class Counsel's efforts.

Nor can the results in this case be judged solely by the monetary component of the settlement. As a result of the combined *Way* and *Gamino* litigation, the County long ago ceased all of the strip search practices addressed in this settlement. That is a major accomplishment, particularly in light of the standing limitations imposed on such cases. Thus, as a result of Class Counsel's efforts, tens of thousands of future inmates have been spared the "embarrassing and humiliating experience", and "extensive intrusion on personal privacy", that a strip

search, "regardless of how professionally and courteously conducted", necessarily entails. *Hunter v. Auger,* 672 F.2d 668, 674 (8th Cir.1982).

E. Experience, Reputation and Ability of Class Counsel

Class Counsel are highly experience litigators in the fields of civil rights and class actions. Mr. Litt is widely known as one of the foremost civil rights attorneys in California, having a particular expertise in civil rights class actions and other complex multi-party civil rights cases, especially law enforcement class actions. He has both spoken and published on the issue of strip search and law enforcement class actions at some length, and is counsel in several other pending class actions, both in California, and in other parts of the country (Washington, D.C., Baltimore and Atlanta). In addition, he has several $1 Million plus civil rights trial verdicts, including a $22.5 Million verdict against the City of Long Beach, which is the largest Fair Housing verdict on record. He has settled three strip search class actions for eight figure sums, aside from this one. (*See* Dec. of B. Litt at ¶¶ 1-12, and his curriculum vitae attached as Exhibit 1.)

Mr. Bell is an experienced civil rights litigator, who has practiced primarily in Ventura County, and has been the most prominent plaintiffs' police abuse attorney in Ventura County for many years. He litigated the *Way* case through the Ninth Circuit and settlement. In addition, Mr. Bell litigated the first part of the *Gamino* case and brought in Mr. Litt when he determined that the settlement process would be aided by a civil rights lawyer experienced in class actions.

F. The Reaction Of The Class

The reaction of the class was very favorable. There were no objections to the settlement. There were only five opt-outs (which is approximately 1/10 of 1%). Over 1000 Claim Forms were timely filed.

G. $1,400,000 Is A Reasonable Fee In This Case

In this case, Plaintiffs' counsel seek an award of $1.4 Million, in addition to the $500,000 received in the *Way* case. This encompasses both fees and costs. (Costs are relatively modest, totaling under $15,000, which includes all the specialized data work performed by consultants retained by Plaintiffs.) The table below reflects the lodestar calculation for Plaintiffs' counsel's work in this case.

Attorney	Hourly Rate	Hours	Total
Earnest Bell	$600	1,602.50	$961,500.00
Barrett S. Litt	$750	187	$140,250.00
Charla Gray	$275	5.3	$1,457.50
Julia White	$235	37	$8,695.00
Total			**$1,111,902.50**

The rates used here are reasonable. Mr. Bell and Mr. Litt have been attorneys since 1988 and 1970, respectively. (Dec. of B. Litt at ¶ 3; Dec. of E. Bell at ¶ 2, attached as Exhibit 2 to Dec. of B. Litt.) Combined, they have 60 years' litigation experience. Mr. Bell, an attorney with 21 years' experience, is the leading plaintiffs' police practices civil rights attorney in Ventura County. (Dec. of E. Bell at ¶¶ 2, 5.) Over the last several years, police misconduct cases have comprised about 90% of his practice. (*Id.* at ¶ 5.) Mr. Litt has 38 years' experience and for the last 25-30 years has focused his practice on complex civil litigation in the areas of constitutional law, civil rights law, class action litigation and complex multi-party litigation. (Dec. of B. Litt at ¶ 3.) In the area of class actions against jails for violation of civil rights involving strip searches, specifically, Mr. Litt is considered one of the leading plaintiffs' lawyers in the country. (*Id.* at ¶ 8.) The rates used by Mr. Bell and Mr. Litt are comparable to Los Angeles market rates for complex litigation. (*See id.* at ¶¶ 10-21; Dec. of E. Bell at ¶ 11.)

In addition, numerous declarations have been filed that were submitted in *Craft v. County of San Bernardino*, 2008 WL 916965 (C.D.Cal. April 01, 2008),

establishing the reasonableness of these rates, and those declarations are a year out of date. Mr. Litt also submitted a declaration establishing that his then current rates have frequently been awarded by courts, and that the rates here reflect his firm's current rates.

In *Craft*, District Judge Stephen Larson, using 2007 rates, found that "rates ranging from a high of $725 per hour for Mr. Litt to a low of $275 for 2006 graduates, as well as law clerk rates of $200 per hour and paralegal rates from a low of $110 to a high of $225 per hour" were "supported by numerous declarations... establish[ing] that the hourly rates set are similar to those for attorneys of comparable skill and experience at the rates paid for complex federal litigation" and that "the rates sought are reasonable and reflect the market for attorneys of comparable skill, experience and expertise in complex federal litigation." *Craft*, 2008 WL 916965 at 9. Judge Larson also noted that it "was Congress' intent for civil rights cases [to use the standard of complex litigation in setting civil rights fee rates]. *See City of Riverside v. Rivera,* 477 U.S. 561, 575-576 (1986) (quoting Senate Report, at 6, U.S. Code Cong. & Admin. News 1976, p. 5913, *supra,* (Congress intended civil rights fees to be comparable to that for 'other types of equally complex Federal litigation, such as antitrust cases')." *Id.*

Plaintiffs anticipate that the lodestar will increase by approximately $100,000 plus in the course of the remaining work on the case, including work between now and the settlement and work over the ensuing period through the final distribution of the funds. (The post-settlement work is expected to be somewhat extensive due to the process of deciding issues such as which possible class members are in fact class members, lien issues and the like). Thus, the total lodestar is approximately $1.2 Million. The total fee award, including the $500,000 awarded in *Way*, is $1.9 Million, which would result in a multiplier of approximately 1.6 ($1.2M x 1.6 = $1.9M).

This is a modest multiplier. Many class action cases have authorized far higher multipliers. *See, e.g., Craft v. County of San Bernardino*, 2008 WL 916965 (C.D.Cal. 2008) (multiplier of 5.2 in strip search class action); *In re Charter Communications, Inc., Securities Litigation*, 2005 WL 4045741, 18 (E.D.Mo. 2005) (multiplier of 5.61); *In re Rite Aid Corp. Sec. Litig,* 362 FSupp.2d 587 (E.D.Pa. 2005) (multiplier of 6.96); *Di Giacomo v. Plains All Am. Pipeline,* Nos. H-99-4137, H-99-4212, 2001 U.S. Dist. LEXIS 25532, at 31, 2001 WL 3463337 at 10 (S.D.Tex. Dec. 18, 2001) (multiplier of 5.3); *Roberts v. Texaco, Inc.,* 979 F.Supp. 185, 197 (S.D.N.Y. 1997) (multiplier of 5.5, plus fund set aside for post-settlement work); *Bynum v. District of Columbia*, 412 F. Supp. 2d 73 (D.D.C. 2006) (multiplier of 2 in strip search class action); *Kuhnlein v. Department of Revenue*, 662 So.2d 309, 315 (Fla. 1995) (class fund award of 10% of $188,100,000, resulting in multiplier of approximately 15, reduced by Fla. Supreme Court to multiplier of 5 times lodestar, because lodestar was proper method under Florida law). See also cases cited in the Appendix in *Vizcaino v. Microsoft Corp.,* 290 F3d 1043 (9th Cir. 2002) (containing several cases with multipliers of three and higher).

In this case, Plaintiffs' counsel obtained a relatively expeditious and "excellent result" in a "complex and risky case". *See Stop & Shop,* 2005 WL 1213926 (E.D.Pa.), *supra.* The *Way/Gamino* case, when initially filed in *Way,* was a very risky case. The size of the recovery for class members is substantial. The "skill and experience brought to bear by counsel throughout the year[s] they spent actively litigating this case, and the economy with which they were able to achieve such a noteworthy settlement" all speak to a substantial fee award. Further, "the award is justified by the high caliber of Plaintiffs' counsels' work in this case." *Stop & Shop, supra.*

H. Awarding Fees and Costs Requested Advances the Purposes of Class Actions in the Context of This Settlement

Because of the structure of the settlement agreement, the $1,400,000 allocated to fees and costs is separate from the individual class members' recovery, *i.e.*, class members will not receive more if a lower fee is awarded. An important purpose of the class action device is that defendants should not benefit from their wrongdoing, and should be deterred from doing so by being vulnerable to class actions to remedy their wrongful conduct. *See, e.g.*, Richard A. Posner, *Economic Analysis of Law* 626-27 (5th ed. 1998) ("the most important point from an economic standpoint is that the violator be confronted with the costs of his violation-this achieves the allocative purpose of the suit-not that he pays them to his victims").

Through the deterrence prism, the defendants would receive an unjustified windfall if the requested fees were not granted in full. In addition, it is important to provide appropriate incentives for attorneys to undertake the risk of class litigation. To the extent they are not properly awarded when they are successful, that undermines the deterrent purpose of the class action mechanism. As recent commentators have observed, if the economic interests of the class and counsel are misaligned, class counsel lose the incentive to maximize the benefit to the class because they do not participate, or do not fully participate, in the benefit of a larger recovery. *See, e.g.*, Myriam Gilles, *Exploding The Class Action Agency Costs Myth: The Social Utility Of Entrepreneurial Lawyers*, University of Pennsylvania Law Review, 155 U. Pa. L. Rev. 103 (November 2006).

CONCLUSION

Based on the foregoing, the Court GRANTS Plaintiffs' Motion for Attorneys' Fees. Defendants are ordered to pay Class Counsel attorneys' fees and

costs in the amount of $1,400,000 pursuant to Paragraph ¶ 26 of the parties' Settlement Agreement [Doc. No. 171].

IT IS SO ORDERED.

DATED: February 5, 2009

By FOR PUBLIC RELEASE
CONSUELO B. MARSHALL
UNITED STATES DISTRICT JUDGE

United States Court of Appeals for the Ninth Circuit

Notice of Docket Activity

The following transaction was entered on 02/10/2009 at 2:23:58 PM PST and filed on 02/06/2009

Case Name: COUNTY OF LOS ANGELES v. USDC-CAC
Case Number: 09-70361

Docket Text:
Received notification from District Court re: payment of docket fee. Amount Paid: USD 450.00 Date paid: 02/06/2009. (JFF)