

1 **WOODNICK LAW, PLLC**
2 1747 E. Morten Avenue, Suite 205
3 Phoenix, Arizona 85020

4 [REDACTED]
5
6 *Gregg R. Woodnick* [REDACTED]
7 *Deandra M. Arena* [REDACTED]
8 *Isabel Ranney*, [REDACTED]
9 *Attorneys for Respondent/Defendant*

10 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**

11 **IN AND FOR THE COUNTY OF MARICOPA**

12 In Re the Matter of:

Case No.: FC2023-052114

13 **LAURA OWENS,**

14 Petitioner,

**APPLICATION FOR ATTORNEYS'
FEES AND COSTS**

(Assigned to the Honorable Julie Mata)

15 And

16 **CLAYTON ECHARD,**

17 Respondent.
18
19

20 Respondent, CLAYTON ECHARD, by and through counsel undersigned, and
21 pursuant to the Minute Entry/Ruling dated June 17, 2024, and filed/entered with the Clerk of
22 the Court on June 18, 2024, Rule 78(b), *Arizona Rules of Family Law Procedure*, A.R.S. §
23 25-324(A), and *Schweiger v. China Doll Restaurant*, 138 Ariz. 183, 673 P.2d 927 (1983),
24 hereby files his Application for Attorneys' Fees and Costs incurred in this matter.
25
26
27
28

1 1. After an Evidentiary Hearing on June 10, 2024 on the issues of non-paternity,
2 sanctions, and attorney's fees, in which the Court had the opportunity to consider the parties'
3 papers, arguments, and evidence presented, the Court Ordered, in pertinent part, as follows:
4

5 **THE COURT FURTHER FINDS** that Petitioner acted
6 unreasonably in the litigation. Specifically, Petitioner acted
7 unreasonably when she initiated litigation without basis or merit.
8 Without an authentic ultrasound, sonogram, physical
9 examination, and in conjunction with a belief she passed tissue in
10 July 2023, the Court finds the underlying Petition premature at
11 best. At worst, however, fraudulent and made to incite
12 communication, a relationship, or both, with the Respondent. The
13 Court further finds that filing a motion seeking mediation for the
14 purpose of telling the Respondent that the pregnancies were not
15 viable disingenuous at best but certainly misleading to the Court.
16 If the purpose of the motion was in fact to attend mediation, then
17 the Petitioner perjured herself today when she said the purpose of
18 the mediation was to tell the Respondent about the miscarriage.
19 Either way, Respondent likely incurred costs associated with this
20 litigation prior to retaining counsel and he is entitled to
21 reimbursement for those costs.

22 **THE COURT FURTHER FINDS** that Petitioner repetitively
23 failed to comply with Rule 49, even on Order of this Court.
24 Further compounded by the fact that on the day of trial, she
25 testified that she anonymously sought care at a Planned
26 Parenthood in Los Angeles. While she failed to provide records
27 of any Planned Parenthood appointment, anonymous or under an
28 alias, Respondent presumably sought records from all Mission
Viejo Planned Parenthoods as that is where, up until today,
Petitioner disclosed she sought care. This undoubtedly, caused
Respondent to incur substantial legal fees attempting to locate
records that may, or may not exist in Los Angeles but now appear
to have never existed in Mission Viejo. Additionally, Petitioner
acknowledged she altered hCG test results, an ultrasound and
sonogram.

THE COURT FURTHER FINDS that the provisions of A.R.S.
§ 25-324(B) do apply because the petition was not filed in good
faith, the petition was not grounded in fact or based on law, the
petition was filed for an improper purpose, such as to harass the

1 other party, to cause an unnecessary delay or to increase the cost
2 of litigation to the other party. Here, the Court finds Petitioner
3 provided false testimony as to the viability of the pregnancy in all
4 three cases addressed in the procedural history. Additionally,
5 prior to her deposition, Petitioner sent a threatening letter to
6 Respondent indicating her intention to sue him for 1.4 million
7 dollars in collateral allegations unless he agreed to dismiss this
8 action that she initiated.

9 **THE COURT FURTHER FINDS** that Laura Owens knowingly
10 presented a false claim, knowingly violated a court order
11 compelling disclosure or discovery such that an award of attorney
12 fees and costs is appropriate under A.R.S. § 25-415.

13 **IT IS THEREFORE ORDERED** granting Clayton Echard's
14 request for attorney fees and costs associated with FC2023-
15 052114.

16 **IT IS FURTHER ORDERED** denying Clayton Echard's
17 request for attorney fees and costs associated with the OOP and
18 IAH hearings referencing the analysis above.

19 **IT IS FURTHER ORDERED** that Laura Owens shall pay
20 Clayton Echard's reasonable attorney fees and costs. Not later
21 than July 8, 2024, Respondent and counsel for Clayton Echard
22 shall submit all necessary and appropriate documentation to
23 support an application for an award of attorney fees and costs,
24 including a China Doll Affidavit and a form of proposed order.
25 By no later than July 29, 2024, Laura Owens shall file any written
26 objection and a form of proposed order. If Clayton Echard's
27 counsel fails to submit the documentation by July 8, 2024, no fees
28 or costs will be awarded. The Court shall determine the award and
enter judgment upon review of the Affidavit as well as any
objections.

2. This Application for Attorneys' Fees and Costs is based upon the Affidavit of
Gregg R. Woodnick, which is attached hereto and incorporated herein as Exhibit "A".

3. Respondent fees and costs with Gregg R. Woodnick and Woodnick Law, PLLC
total \$154,242.76. *See* the Fee Agreement which is attached to the Application for Attorneys'

1 Fees and Costs hereto as Exhibit "B." *See also* Invoices/Itemization for Professional Services,
2 which are signed attached hereto as Exhibit "C."

3 WHEREFORE, Respondent respectfully requests this Honorable Court enter an
4 Order/Judgment awarding his attorneys' fees and costs to be paid by a date certain and to
5 accrue interest if not paid, and any other orders this Court deems just and proper.
6

7 **RESPECTFULLY SUBMITTED** this 8th day of July 2024.
8

9 **WOODNICK LAW, PLLC**

10 

11 _____
12 Gregg R. Woodnick

13 Deandra M. Arena

14 Isabel Ranney

15 *Attorneys for Respondent/Defendant*

16 **ORIGINAL** of the foregoing e-filed
17 this 8th day of July 2024 with:

18 Clerk of the Court
19 Maricopa County Superior Court

20 **COPY** of the foregoing document
21 delivered this same day to:

22 The Honorable Julie Mata
23 Maricopa County Superior Court

24 **COPY** of the foregoing document
25 emailed this same day to:

26 David Gingras
27 Gingras Law Office, PLLC
28 4802 E. Ray Road, #23-271
Phoenix, AZ 85004


Attorney for Petitioner/Plaintiff

By: /s/MB

Exhibit “A”

1 **WOODNICK LAW, PLLC**
2 1747 E. Morten Avenue, Suite 205
3 Phoenix, Arizona 85020

4 [REDACTED]
5 *Gregg R. Woodnick,* [REDACTED]
6 *Deandra M. Arena,* [REDACTED]
7 *Isabel Ranney,* [REDACTED]
8 *Attorneys for Respondent/Defendant*

9 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**

10 **IN AND FOR THE COUNTY OF MARICOPA**

11 In Re the Matter of:

Case No.: FC2023-052114

12 **LAURA OWENS,**

13 Petitioner,

**CHINA DOLL AFFIDAVIT FOR
ATTORNEY'S FEES AND COSTS**

(Assigned to the Honorable Julie Mata)

14 And

15 **CLAYTON ECHARD,**

16 Respondent.
17
18

19 STATE OF ARIZONA)
20) ss.
21 County of Maricopa)

AFFIDAVIT

22 **Gregg Woodnick**, being first duly sworn upon oath, deposes and states as follows:

23 That I am the managing attorney at Woodnick Law, PLLC and, together with Deandra
24 M. Arena Esq. and Isabel Ranney Esq., we are the attorneys of record for Respondent,
25 **CLAYTON ECHARD.**
26

27 That I am a citizen of the United States, over the age of eighteen (18) years and make
28

1 this Affidavit based upon personal knowledge. I am competent to testify as to the matters
2 addressed herein.

3 That myself and all attorneys involved are licensed to practice law in the State of
4 Arizona.

5
6 That in light of the highly contentious nature of this litigation, amplified by Petitioner
7 alleging that one of the attorneys at this firm was complicit in a sexual assault, the office
8 instituted a policy requiring the presence of a second professional during any interaction with
9 Ms. Owens or her numerous attorneys.

10
11 That annexed as **Exhibit B** is the Fee Agreement entered into by Clayton Echard with
12 the firm for Woodnick Law, PLLC. The fee agreement is based on an hourly fee rate.

13
14 That my (GW) billing rate for this matter is \$650.00 per hour. Attorney, Deandra M.
15 Arena's (DA) billable rate is \$425.00 per hour. Attorney Markus Risinger's (MR) billing rate
16 is \$425.00 per hour, Attorney, Isabel Ranney's (IR) billable rate is \$295.00 per hour. The firm
17 employed multiple paralegals (MB, SS, EP) who provided assistance in this matter as detailed
18 herein. Paralegals were billed at the hourly rate of \$175.00 per hour. The firm employed a
19 Law Clerk (LC) in this matter, who is billed at the hourly rate of \$175.00 per hour. **The total**
20 **funds that have been expended on this litigation are over \$165,000. However, fees that**
21 **were related to the litigation of Respondent's Injunction Against Harassment have been**
22 **excluded, as the Court expressly denied attorney's fees and costs related to that matter.**
23 **All attorney's fees and costs included herein were necessary and reasonable.**

24
25
26
27 That the Court should note that early in the litigation that Mr. Echard received
28 assistance from "GoFundMe." These limited funds were appreciated by Echard but only

1 covered some of the expenses and costs related to Mr. Echard's Injunction action, which has
2 been expressly excluded from this accounting. The GoFundMe proceeds did not contribute to
3 Mr. Echard's legal fees paid, incurred, or actually due and owing in this matter (FC2023-
4 052114).
5

6 That the fees and costs incurred in this matter through Woodnick Law, PLLC, are as
7 more specifically set forth on the Invoice for Professional Services, which is attached to the
8 Application for Attorneys' Fees and Costs as Exhibit "B."
9

10 That Respondent has agreed to pay and has been charged for said services as set rate,
11 as documented by the 2023 Fee Agreement;
12

13 That the billing time/keeping information related to this matter was documented
14 utilizing regular billing software, in the ordinary course of the Firm's business and accounting
15 practices.
16

17 That all of the items related to bills associated with counsel's time therein were made
18 and kept entirely in the normal course of this firm's activity on this case based upon time
19 records kept by the person generating the activity at or near the time the services were
20 performed pursuant to the regular practice of this firm.
21

22 That all of the items related to bills associated with counsel's time are true and correct,
23 and each was necessarily expended in the course of litigation of the scope specifically
24 identified by this Court in its June 17, 2024 Ruling awarding attorney's fees and costs.
25

26 That Affiant, Gregg R. Woodnick:

- 27 a. Has been practicing law in Arizona for 24 years;
28 b. Is the Co-author of the Family Law Attorney's Fees Survey;

- 1 c. Is the current Chair of the State Bar Client Protection Fund (Board of
- 2 Governors' appointee);
- 3 d. Is cooperating counsel to the ACLU;
- 4 e. Was previously appointed by Chief Justice Bales (ret.) to the Arizona Supreme
- 5 Court Task Force on the Arizona Rules of Family Law Procedure;
- 6 f. Is a Former adjunct law professor;
- 7 g. Is a Graduate School Lecturer (current and former): Sandra Day O'Connor
- 8 College of Law, Midwestern University College of Osteopathic Medicine,
- 9 Northern Arizona University Department of Physician Assistant Studies, Yale
- 10 University Physician Assistant Program, Creighton University PA Studies;
- 11 h. Is a CLE Instructor: Arizona Chapter/AFCC, Children's Services Network,
- 12 Maricopa County Bar Association, AAML/State Bar of Arizona, Half-Moon
- 13 Education;

14 **That attorney Deandra M. Arena:**

- 15 a. Is a former Assistant Attorney General for Protective Services;
- 16 b. Is licensed to practice law in both California and Arizona;

17 **That attorney Markus Risinger:**

- 18 a. Is an adjunct professor of administrative law in the MLS/MHREL Program at
- 19 Sandra Day O'Connor College of Law;
- 20 b. Is cooperating counsel to the ACLU;

21 **That attorney Isabel Ranney:**

- 22 a. Is an associate attorney at Woodnick Law PLLC;
- 23 b. Was formerly a law clerk at Woodnick Law PLLC.

24 That all attorneys, paralegals, law clerks, and staff involved in this matter are duly

25 qualified and experienced commensurate with their respective hourly billing rates and that the

26 rates agreed upon and actually charged are customary and consistent with the prevailing

27 market for legal services of the kind.

28 That the attorney's fees and costs incurred for Mr. Echard's representation are reasonable given the qualities of the advocates, the character of the work to be done, the work

1 actually performed, and the result, all in accordance with *Schweiger v. China Doll Restaurant,*
2 *Inc.* and its progeny.

3 That the total time expended consistent with this Court's Minute Entry is 356.6 hours.
4
5 The total amount of attorney's fees and costs associated with FC2023-052114 are
6 \$153,592.76. Preparation of the China Doll was an additional 1.0 hours and \$650.00, for a
7 total of \$650.00.

8
9 That this application includes not only statutory, taxable costs, but also other
10 reasonable and necessary expenses of litigation, all in accordance with the provisions of
11 A.R.S. § 25-34.

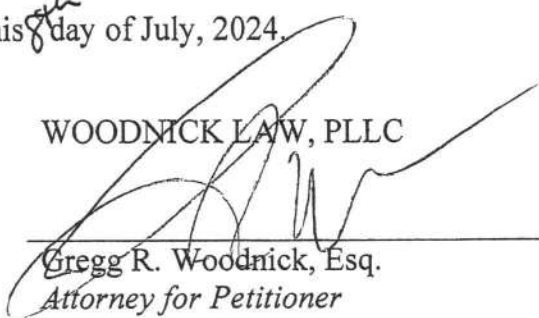
12
13 That the Court should determine that the requested attorney's fees, court costs and
14 expenses itemized herein are reasonable, and thereupon, computation should be made in
15 accordance with the following arithmetic formula:

16	Attorney fees	\$148,816.00
17	+ Cost of <i>China Doll</i>	\$650.00
18	+ <u>Total court costs and expenses</u>	<u>\$4,776.76</u>
19	Total Costs and Fees	\$154,242.76

20
21 **WHEREFORE**, based upon the above, undersigned counsel respectfully requests that
22 Court enter an order for his reasonable attorney's fees and costs incurred as stated above.

23
24 **RESPECTFULLY SUBMITTED** this ^{8th} day of July, 2024.

25
26 WOODNICK LAW, PLLC

27
28 

Gregg R. Woodnick, Esq.
Attorney for Petitioner

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

SUBSCRIBED AND SWORN to before me this ^{8th} day of July, 2024, by Gregg R. Woodnick.

Maribeth Burroughs
Notary Public

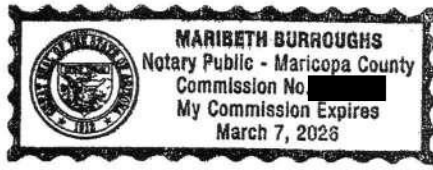


Exhibit “B”

December 11, 2023

Clayton Echard


**RETAINER AGREEMENT
CONFIDENTIAL AND PRIVILEGED INFORMATION**

Dear Clayton:

I am writing to confirm the terms under which the Office of Woodnick Law, PLLC (the "Firm") will represent **CLAYTON ECHARD** (the "Client"). We appreciate your decision to retain the Firm in this matter. So that we all clearly understand the basis upon which we have agreed to represent you, I have prepared this letter.

1. **Clients Represented and Scope of Representation.** It is understood that our Client for the purpose of this representation is **CLAYTON ECHARD** and not any of Client's individual members, family members or any other entities. The Firm has been retained for services for *limited representation* in the pending Family Court case (Owens v. Echard; FC2023-052114), not including appellate issues, through **February 15, 2023**. By signing this agreement, Client acknowledges that this scope is limited and dependent on funding. Should funding become an issue, Client agrees that Woodnick Law maintains the ability to terminate the agreement.
2. **Other Matters.** The Firm will **not** provide tax advice. This fee agreement also does **not** include appeals taken to any federal or state court of appeals by any party. A separate agreement will be prepared if Client and the Firm mutually agree to representation in an appellate matter. The Firm also does **not** handle or prepare Qualified Domestic Relations Orders (QDROs) or other similar orders required to divide retirement benefits outside of the Decree. *It may be beneficial to enter retirement orders contemporaneously with the entry of a Decree, rather than waiting until after a Decree is done. If you have any concerns about your retirement benefits, please let us know so that we can discuss the issue and your concerns.*
3. **No Guarantees.** It is understood that the Firm has not made and cannot make any guarantee of success in this matter. We will work diligently and competently to achieve Client's objectives but we cannot guarantee the success of any matter.
4. **Staffing.** I will have primary responsibility for your matter. We also may use other attorneys, paralegals and litigation/clerical assistants where appropriate. Staffing

decisions will be made by me, with the objective of rendering services on an efficient and cost-effective basis.

5. **Fees.** We bill for professional services in accordance with Rule 1.5 of the Rules of Professional Conduct promulgated by the Arizona Supreme Court, primarily based upon the schedule of hourly rates established by the Firm for the lawyers and other members of the professional staff of the Firm. In order to help us determine the value of services that we render, our attorneys, paralegals and document clerks maintain written records of the actual time they spend working for Clients. The hourly rates are based on years of experience, training and practice and level of professional attainment. We periodically review our hourly rates and make adjustments as necessary.

• Gregg R. Woodnick:	<u>\$650.00</u>
• Bradley A. TenBrook:	<u>\$495.00</u>
• Leslie A.W. Satterlee;	<u>\$495.00</u>
• Sabra M. Barnett:	<u>\$425.00</u>
• Kaci Y. Bowman:	<u>\$425.00</u>
• Markus Risinger:	<u>\$425.00</u>
• Deandra M. Arena:	<u>\$425.00</u>
• Isabel Ranney:	<u>\$295.00</u>
• Law Clerks:	<u>\$175.00</u>
• Paralegals:	<u>\$175.00</u>

The Firm requires an Advance Fee Deposit of \$4,000 that will be held in the trust account and billed against and will be credited anticipated fees referenced herein. Client has agreed to pay \$4,000 at the time of engagement.

The Firm bills in 1/10 of an hour segments. Fees are charged for such services as telephone calls, sending and reviewing emails, drafting and reviewing documents, legal research, attending and preparing for hearings, and travel to and from hearings and meetings. Statements for services rendered and costs incurred will be emailed to the address listed above during the month following the month in which services are rendered and costs advanced or charged. All statements are due and payable upon receipt and will be deducted from the Advance Fee Deposit unless Client notifies the Firm within ten (10) days of emailing of the invoice that Client has a question about the statement. The Firm reserves the right to notify Client that the fee deposit has been depleted and must be replenished.

If the Firm receives payment of Client Fees from a third party, the Firm assumes that the Client has given informed consent for the third party to make such payment. Such third-party payments do not alter the Firm's duties to the Client or representation of the Client. The Firm will not share confidential information with the third party unless otherwise expressly agreed to in writing by the Client. If any refund of fees is requested or paid by the Firm, the refund belongs to the Client and shall be paid to the Client and not the third party.

You will be receiving monthly billing statements from our office. We will be relying upon you to review your invoices carefully upon receipt and to notify our office promptly if you believe any statement is inaccurate in any way, or if you have any questions regarding the statement. The billing statements will be emailed to you at the email address on file. Please make sure to update us if you change your email/ mailing address.

6. **Costs**. In addition to our fees for services, Client will be responsible for all out-of-pocket disbursements that we incur on their behalf. Other than extraordinary costs, The Firm does not charge for costs associated with long-distance telephone calls, outgoing fax, or photocopying. However, charges may be incurred for filing fees, retention of private investigators, retention of expert witnesses, and online database research charges (Lexis, Westlaw, etc.). We anticipate making advances to cover out-of-pocket costs incurred but reserve the right to forward to Clients any larger items with the request that they pay them directly to the service providers. Client will provide a **Cost Advance of \$0.00** in addition to any fee advances to cover anticipated expenses. Note that the Cost Advance is not a maximum amount for all costs but a down-payment towards anticipated expenses. Client will be provided with a monthly statement of costs and expense that have been deducted from the Cost Advance.
7. **Clients' Responsibilities**. Recognizing that the Firm cannot effectively represent Client without their cooperation and assistance, Client agrees to cooperate fully with the Firm and to provide promptly all information known or available to Client relevant to the Firm's representation, including providing information and documents requested in a timely fashion; assisting in discovery, disclosure and trial preparation; cooperating in scheduling and related matters; responding to telephone calls and correspondence in a timely manner; and informing the Firm of changes in Clients' address and telephone numbers.
8. **Discovery and Disclosure**: During litigation, each party has the right to request information from the other party, including employment and income records; medical, psychological and any other health-related records; criminal and domestic violence records or history; any other information that may be relevant to financial issues and child-related issues, as well as electronic items. This process is called Discovery. Discovery can include electronic discovery; therefore, everything that you post online or through social media may be discoverable. It is important to refrain from discussing your personal situation on the internet. It is also sanctionable if you take any action to destroy or delete any potentially relevant evidence, including social media postings. If you have any questions about this, please make sure to discuss with the Firm.
9. **Electronic Communications**. We communicate from time to time with our clients via facsimile, mobile telephone, and email. You are responsible for providing us with an email address that you want us to use for correspondence related to the representation. You should check that email address regularly. We will assume that third parties (e.g., employers or family members) do not have access to that email address so you can receive confidential correspondence from us. You should change your email address password if there is any reason to believe that anyone else knows your password and

can access your emails. Please be certain that your email filters do not block emails from our office and that the allowable size of incoming emails is sufficient to accept emails from us with attachments.

No form of communication is completely secure and these forms of communication have some risk of improper interception even though our Firm maintains reasonable security measures to assure the confidentiality of your information. Accordingly, unless you instruct us that you prefer to receive only a paper copy in the mail and do not wish to communicate by email, we will send you each document that is relevant to your matter by email as a scanned document in "pdf" or "tif" format. If you require any heightened security measures for the storage or transmission of electronic data, such as for government clearances, please notify me.

10. **Data and Document Retention.** We retain many file documents and data in electronic format only. These documents and data may be stored on a remote secure third-party server hosted through the internet.

During the course of our representation of Client, you may have occasion to provide us with documents and other materials. Please provide us with only copies of documents, unless we expressly request an original. At the end of our engagement, the Firm will return any original documentation provided to us or created by us as directed by the Client. Therefore, if there is something that you want to retain in the original form, please make sure you specifically advise us of that.

During the course of the representation the Firm will provide Client with copies of all other documents that the Firm receives or generates on Client's matter, except for attorney notes. ***It is important that you retain all communications from and to us, including emails and attachments to emails. These are being tendered to you as your file for this matter and not all emails may be saved to your file by the Firm.*** You are responsible for maintaining your own copy of the file, which you will receive during the representation. If you request a copy of your file at the end of the representation, the copy may be provided to you as either an electronic or paper copy. If you ask for additional copies, you will be asked to pay the full copying charges and to satisfy all copying and duplication costs at that time.

At the conclusion of the representation, it is our office policy is to convert your file to electronic form only and destroy the paper copy. We will maintain our electronic copy of your file for five (5) years, at which time it may be destroyed without further notice.

11. **Collection.** If it is necessary to institute collection actions to enforce this agreement, Client will be responsible for reasonable attorneys' fees for the action, in addition to all amounts owed under the agreement for fees and costs.
12. **Termination of Engagement.** Either of us may terminate the engagement at any time for any reason by written notice, subject on our part to applicable rules of professional conduct. In the event that the Firm terminates the engagement, we will take such steps

as are reasonably practicable to protect Clients' interests in this matter. If Client terminates the Firm, the Firm will be entitled to fees for the services completed. The Firm reserves the right to decline to perform further services if any account is thirty (30) days or more past due. Subject, of course, to our ethical and professional obligations, Clients must agree that the Firm may terminate its legal services and withdraw from this engagement in such event. Unless previously terminated, our representation of Clients will terminate upon our sending our final statement for services rendered.

Notwithstanding the above, any portion of the retainer now used or applied to Clients' account shall be returned within ten (10) days of the latter to occur (a) settlement of any and all claims or (b) termination of engagement less any monies owed to the Firm.

Very truly yours,
WOODNICK LAW, PLLC



By: Gregg R. Woodnick, Esq.
Attorneys at Law

**THE TERMS OF THE ENGAGEMENT OF THE FIRM AS STATED ABOVE ARE
ACCEPTED AND APPROVED BY:**



Gregg R. Woodnick



Clayton Echard

(Additional Signatures Required On Following Page)

THE TERMS OF THE ENGAGEMENT OF THE FIRM AS STATED ABOVE ARE
ACCEPTED AND APPROVED BY:



CLAYTON ECHARD
Client

12/11/2023

DATE

Exhibit “C”

Woodnick Law, PLLC
 1747 E. Morten Ave., Ste. 205
 Phoenix, AZ 85020

Invoice submitted to:
 Clayton Echard

June 18, 2024

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
12/8/2023	IR CALL WITH CLAYTON TO DISCUSS NEXT STEPS AND REVIEW OF HIS DRAFT MOTION AND EDITS TO SAME .2; STAFF WITH GW AND DA .2	0.40 295.00/hr	118.00
12/11/2023	LC DRAFT INITIAL PLEADINGS FOR FC MATTER	0.90 175.00/hr	157.50
	IR DRAFT ENGAGEMENT AGREEMENT AND LETTER TO CLIENT; EMAIL OF SAME	0.30 295.00/hr	88.50
	IR EDITS TO AND REVIEW OF NOA	0.10 295.00/hr	29.50
	IR CALL TO BRETT FROM RAVGEN	0.20 295.00/hr	59.00
	IR DRAFT AFFIDAVIT OF NONPATERNITY AND PUTATIVE FATHER REGISTRY RESEARCH .2 DRAFT EXPEDITED MOTION TO EXTEND DISMISSAL 1.5	1.70 295.00/hr	501.50
	IR DRAFT RFPS FOR OPPOSING PARTY	0.20 295.00/hr	59.00
	GRW STAFF WITH IR REGARDING AGENDA .2, MEETING WITH CLAYTON REGARDING SAME .8	1.00 650.00/hr	650.00
	IR EDITS TO EXPEDITED MOTION; DRAFTING OF MOTION FOR LEAVE TO AMEND AND AMENDED RESPONSE	1.50 295.00/hr	442.50
	IR DRAFTING MOTION FOR LEAVE TO AMEND; EDITS TO RESPONSE	0.50 295.00/hr	147.50

		<u>Hrs/Rate</u>	<u>Amount</u>
12/11/2023	IR EMAIL DRAFTS TO CLIENT FOR HIS REVIEW WITH INSTRUCTIONS	0.10 295.00/hr	29.50
12/12/2023	IR COORDINATION OF EXHIBITS AND FINALIZING DRAFTS FOR FILING WITH CLIENT EDITS; EMAIL TO CLIENT REGARDING SAME	0.50 295.00/hr	147.50
	IR STAFF WITH GW, DRAFTING OF COVER NOTE TO OPPOSING PARTY	0.40 295.00/hr	118.00
	MB FINALIZED, FILED AND SENT TO CLIENT, OPPOSING PARTY AND JA NOTICE OF APPEARANCE, MOTION TO AMEND RESPONSE TO PETITION, EXPEDITED MOTION TO EXTEND THE INACTIVE CALENDAR, AND NOTICE OF FILING NON-PATERNITY	0.50 175.00/hr	87.50
12/20/2023	MR STAFF WITH IR REGARDING ATTORNEYS FEES ISSUE	0.20 425.00/hr	85.00
12/21/2023	IR CALL WITH CLIENT TO DISCUSS COMPLIANCE WITH OOP AND MEDIA	0.50 295.00/hr	147.50
12/22/2023	IR FORWARD NOA TO CLAYTON WITH NOTE	0.10 295.00/hr	29.50
12/27/2023	IR CALL TO OPPOSING PARTY WITH GW AND CALL TO CLIENT TO DISCUSS SAME .5; EDITS TO STIP TO DISMISS AND DRAFT AFFIDAVIT .5; STAFF WITH GW REGARDING SAME .5- DISCOUNT TIME by ½ TO .8	0.80 295.00/hr	236.00
	GRW CALL WITH OPPOSING COUNSEL, STAFF WITH IR, CALL WITH CLAYTON, STAFF LANGUAGE OF LETTER AND NEXT STEPS WITH IR AND DICTATE EMAIL TO SEND OPPOSING COUNSEL	1.50 650.00/hr	975.00
	GRW ROUNDS OF EDITS WITH IR OF LETTER TO OPPOSING PARTY	0.50 650.00/hr	325.00
	IR FINISHING TOUCHES TO DRAFT LETTER AND DOCUMENTS; CALL TO CLIENT REGARDING SAME; CLIENT APPROVAL; EMAIL TO OPPOSING PARTY	0.30 295.00/hr	88.50
12/28/2023	IR DRAFT NOTICE OF DEPO	0.10 295.00/hr	29.50
	IR EMAIL TO OPPOSING PARTY WITH NOTICE OF DEPO AND EXHIBIT A; FORWARD TO CLIENT WITH NOTE REGARDING SAME	0.20 295.00/hr	59.00
	GRW STAFFING WITH IR AND EDITING NOTICE OF DEPO AND LETTER TO OPPOSING COUNSEL AND STRATEGY	0.60 650.00/hr	390.00
	IR EMAILS WITH OPPOSING COUNSEL COORDINATING DEPOSITION AND STAFF WITH GW REGARDING SAME .6 (DISCOUNT BY ½)	0.30 295.00/hr	88.50

		<u>Hrs/Rate</u>	<u>Amount</u>
12/28/2023	IR CALL WITH CLIENT AND GW TO DISCUSS STRATEGY, FILINGS BY OPPOSING COUNSEL	0.20 295.00/hr	59.00
	IR REVIEW OF FILINGS BY OPPOSING COUNSEL	0.20 295.00/hr	59.00
	MR TC WITH IR REGARDING NEW MOTION FILING FROM OPPOSING COUNSEL AND IMMEDIATE RESPONSIVE ACTIONS TO TAKE	0.20 425.00/hr	85.00
	MR REVIEWED MOTION TO DISMISS FOR LACK OF JURISDICTION AND RESPONSE TO MOTION TO EXTEND FOR LEGAL ISSUES, ETC.	0.20 425.00/hr	85.00
12/29/2023	MR STAFFING WITH IR REGARDING RESPONSE TO MTD, INCLUDING EVIDENTIARY ISSUE, SMJ ISSUE, MOOTNESS ISSUE, ETC.	0.30 425.00/hr	127.50
	MR RESEARCH REGARDING CASE LAW FOR SMJ ARGUMENT AND OTHER LEGAL QUESTIONS POSED BY MOTION TO DISMISS AND STAFF WITH IR FOR INCLUSION WITH RESPONSE	0.50 425.00/hr	212.50
	IR EMAILS WITH OPPOSING COUNSEL TO OBTAIN VERIFIED STATEMENT FROM LO	0.20 295.00/hr	59.00
	IR STAFF WITH MR AND GW REGARDING NEXT STEPS .2; FIRST DRAFTING OF MOTION TO DISMISS AND LEGAL RESEARCH SUPPORTING SAME 1.0	1.20 295.00/hr	354.00
	LC DRAFT VERIFICATION SHEET FOR OPPOSING PARTY PER IR REQUEST	0.10 175.00/hr	17.50
	IR CONTINUED EDITS TO DRAFT MOTION TO DISMISS 1.5, LEGAL RESEARCH REGARDING SAME .5	2.00 295.00/hr	590.00
1/2/2024	IR MESSAGES WITH CLIENT REGARDING STATUS AND STRATEGY	0.20 295.00/hr	59.00
	IR REVIEW OF MOTION TO QUASH DEPO, FORWARD TO CLIENT WITH NOTE REGARDING SAME	0.20 295.00/hr	59.00
	IR EMAIL FROM CLIENT REGARDING PATERNITY ISSUE; RESPONSE TO SAME AND STAFF WITH GW	0.10 295.00/hr	29.50
	GRW STAFF WITH IR, EMAIL WITH CLAYTON	0.30 650.00/hr	195.00
	IR CONTINUED WORK ON DRAFT RESPONSE TO MOTION TO DISMISS	0.50 295.00/hr	147.50
	GRW REVISE RESPONSE WITH IR	0.30 650.00/hr	195.00

		<u>Hrs/Rate</u>	<u>Amount</u>
1/2/2024	MB EMAILED CLIENT VERIFICATION TO ESIGN	0.10 175.00/hr	17.50
	IR CLEAN UP DRAFT MOTION TO DISMISS .2 DRAFT MOTION FOR SANCTIONS .2 DRAFT REPLY TO RESPONSE TO EXPEDITED MOTION TO EXTEND DISMISSAL .3	0.70 295.00/hr	206.50
	IR EDITS TO DRAFT MOTION FOR SANCTIONS	0.30 295.00/hr	88.50
	GRW STAFF WITH IR REGARDING UNEXPECTED MTW AND HOW THAT FACTORS INTO CASE	0.10 650.00/hr	65.00
1/3/2024	MB FINALIZED, FILED AND SENT TO CLIENT AND OPPOSING COUNSEL RESPONSE TO MOTION TO DISMISS	0.30 175.00/hr	52.50
	IR EXHIBIT COORDINATION AND ADDITIONS TO RESPONSE TO MTD	0.40 295.00/hr	118.00
	GRW REVISED DRAFT WITH IR, STAFF WITH IR REGARDING AGENDA ITEMS	0.20 650.00/hr	130.00
	MR REVIEWED MOTION FOR SANCTIONS PER IR REQUEST AND STAFF WITH LC REGARDING REFORMATTING AND STRUCTURAL REVISIONS	0.20 425.00/hr	85.00
	IR EDITS AND UPDATES TO REPLY TO RESPONSE TO EXPEDITED MOTION AND FORWARD TO CLIENT FOR REVIEW	0.30 295.00/hr	88.50
	IR MINOR EDITS TO MOTION FOR SANCTIONS	0.20 295.00/hr	59.00
	MR SUBSTANTIAL REVIEW AND REVISIONS TO MOTION FOR SANCTIONS PER IR REQUEST AND STAFF WITH IR AND LC REGARDING STRATEGY ISSUES	0.40 425.00/hr	170.00
	IR RESPONSE TO MOTION TO QUASH DRAFT	1.00 295.00/hr	295.00
	MB FINALIZED, FILED AND SENT TO CLIENT AND OPPOSING COUNSEL MOTION FOR SANCTIONS AND REPLY TO RESPONSE TO MOTION TO EXTEND	0.30 175.00/hr	52.50
1/4/2024	IR EDITS TO RESPONSE TO MOTION TO QUASH; PULL EXHIBITS AND ORGANIZE PLEADING FOR FILING	0.30 295.00/hr	88.50
	MB FINALIZED, FILED AND SENT TO CLIENT AND OPPOSING COUNSEL RESPONSE TO MOTION TO QUASH	0.20 175.00/hr	35.00

		<u>Hrs/Rate</u>	<u>Amount</u>
1/5/2024	IR DRAFTING REGARDING RESPONSE TO OPPOSING COUNSEL REQUEST FOR MORE TIME	0.50 295.00/hr	147.50
	GRW REVISIONS TO LETTER AND STAFF WITH IR	0.40 650.00/hr	260.00
1/9/2024	IR EMAIL FROM COURT REGARDING MOTIONS; FORWARD TO CLIENT WITH NOTE	0.10 295.00/hr	29.50
	GRW CALL WITH LAURA'S NEWEST ATTORNEY KELLY MENDOZA, EMAIL TO KELLY	0.70 650.00/hr	455.00
1/10/2024	IR DRAFT EMAIL RESPONSE WITH GW	0.30 295.00/hr	88.50
	MR STAFFING WITH GW AND IR REGARDING STATUS OF CASE, PENDING MOTIONS, UPCOMING ISSUES, ETC.	0.10 425.00/hr	42.50
	IR REVIEW OF REPLY IN SUPPORT OF MOTION TO DISMISS; FORWARD SAME TO CLIENT WITH NOTE	0.20 295.00/hr	59.00
	IR RESEARCH AND DRAFTING QUESTIONS FOR DEPOSITION OF OWENS	1.20 295.00/hr	354.00
	IR CALL WITH ATTORNEY	0.50 295.00/hr	147.50
1/11/2024	IR FILE REVIEW; CONTINUED DRAFTING OF QUESTIONS FOR DEPOSITION	1.00 295.00/hr	295.00
	GRW LATE NIGHT CALL FROM CLAYTON AND CONF WITH ATTORNEY IN CA	0.70 650.00/hr	455.00
	MB RECEIVED AND SENT TO CLIENT NOTICE OF APPEARANCE	0.10 175.00/hr	17.50
1/12/2024	IR EMAIL TO SCHEDULING EMAIL FOR DEPOSITION OF OWENS	0.20 295.00/hr	59.00
	IR CALL WITH TRANSCRIBER/VIDEOGRAPHER FOR DEPOSITION	0.20 295.00/hr	59.00
	IR STAFF DEPOSITION WITH GW AND WORK ON QUESTIONS/APPROACH	0.40 295.00/hr	118.00
1/15/2024	LC ORGANIZE EXHIBITS FOR DEPOSITION ON 1/17	0.80 175.00/hr	140.00
	GRW STAFF WITH IR REGARDING AGENSDA .3 EMAIL DRAFT TO NEW ATTORNEY #3 .2	0.50 650.00/hr	325.00

		<u>Hrs/Rate</u>	<u>Amount</u>
1/15/2024	IR DEPOSITION PREP .5; EMAILS TO CLIENT REQUESTING TEXT MESSAGES; RECEIPT AND REVIEW OF SAME .2	0.70 295.00/hr	206.50
	IR DEPOSITION PREP; CALL FROM CLIENT; EMAILS TO CLIENT REGARDING SAME .5 STAFFING WITH GW .3 REVIEW OF RECORD AND MORE DEPOSITION QUESTION PREP .9	1.70 295.00/hr	501.50
	MB ORGANIZED, REDACTED, BATE STAMPED AND DRAFTED INITIAL DISCLOSURE STATEMENT	3.50 175.00/hr	612.50
	MB FINALIZED AND SENT TO CLIENT AND OPPOSING COUNSEL INITIAL DISCLOSURE STATEMENT	0.20 175.00/hr	35.00
1/16/2024	IR DEPOSITION PREP	0.60 295.00/hr	177.00
	IR MORE DEPOSITION PREP	0.50 295.00/hr	147.50
	GRW EMAIL TO OC	0.40 650.00/hr	260.00
	MB PREPARED EXHIBIT FOR DEPOSITION	1.20 175.00/hr	210.00
	GRW EMAIL FROM OPPOSING COUNSEL, CALL TO CLAYTON REGARDING DEPOSITION STATUS CANCELED	0.30 650.00/hr	195.00
1/17/2024	GRW REVISE EMAIL TO CORY REGARDING CANCELED DEPOSITION	0.20 650.00/hr	130.00
	IR CANCELLATION OF VIDEOGRAPHER .1 STAFF WITH GW REGARDING DRAFT LETTER TO OPPOSING COUNSEL .2	0.30 295.00/hr	88.50
	IR DRAFT SPOILIATION LETTER TO AMAZON	0.20 295.00/hr	59.00
	IR STAFFING WITH GW AND EDITS TO SPOILIATION LETTER FINAL TOUCHES AND REVIEW OF SAME	0.20 295.00/hr	59.00
	IR DRAFT NOTICE OF NONAPPEARANCE STAFFING AND EDITS TO SAME PREPARATION OF EXHIBIT A FOR FILING	0.60 295.00/hr	177.00
	GRW ROUGH DRAFT NOTICE FILING	0.20 650.00/hr	130.00

		<u>Hrs/Rate</u>	<u>Amount</u>	
1/17/2024	EP	FINALIZE NOTICE AND ORCHESTRATION FOR FILING AND EMAIL TO COURT AND OPPOSING COUNSEL.	0.30 175.00/hr	52.50
	GRW	EMAIL WITH CORY REGARDING DEPOSITION ISSUES AFTER STAFFING WITH KB	0.20 650.00/hr	130.00
1/18/2024	MB	RECEIVED AND SENT TO CLIENT MOTION FOR CONFIDENTIALITY AND PROTECTIVE ORDER	0.10 175.00/hr	17.50
	MR	STAFF WITH IR REGARDING RESPONSE TO MOTION FOR CONFIDENTIALITY/PROTECTIVE ORDER	0.50 425.00/hr	212.50
	IR	STAFF WITH MARKUS REGARDING RESPONSE TO MOTION FOR PROTECTIVE ORDER	0.50 295.00/hr	NO CHARGE
	MB	RECEIVED AND SENT TO CLIENT MINUTE ENTRY RE GRANTING WITHDRAW	0.10 175.00/hr	17.50
	IR	FIRST DRAFT OF RESPONSE TO MOTION FOR PROTECTIVE ORDER	1.00 295.00/hr	295.00
	IR	ORCHESTRATION AND PREPARATION OF POSSIBLE EXHIBITS FOR RESPONSE TO MOTION FOR PROTECTIVE ORDER	0.40 295.00/hr	118.00
	MR	REVIEW AND REVISIONS TO RESPONSE TO MOTION FOR PROTECTIVE ORDER PER GW/IR REQUEST	0.80 425.00/hr	340.00
	IR	MESSAGES WITH CLIENT REGARDING STATUS .1 EDITS TO RESPONSE TO MOTION FOR PROTECTIVE ORDER .2 EMAIL TO COURT REGARDING MINUTE ENTRY SETTING HEARING .1	0.40 295.00/hr	118.00
	IR	STAFF WITH GW AND EDITS TO DRAFT RESPONSE/OBJECTION	0.60 295.00/hr	177.00
1/19/2024	GRW	STAFF RESPONSE WITH IR; EDITS TO DRAFT RESPONSE TO MOTION FOR PROTECTIVE ORDER	0.50 650.00/hr	325.00
	IR	STAFFING WITH GW .1, REVIEW AND ORCHESTRATION OF EXHIBITS .3, CONTINUING EDITS TO DRAFT RESPONSE TO MOTION FOR PROTECTIVE ORDER .6	1.00 295.00/hr	295.00
	IR	FINAL EDITS TO DRAFT RESPONSE OBJECTION .5 CALL WITH CLIENT TO EXPLAIN STRATEGY .2	0.70 295.00/hr	206.50
	IR	REVIEW NOTICE OF DEPOSITION AND FORWARD TO CLIENT WITH NOTE REGARDING SAME	0.20 295.00/hr	59.00
	MB	FINALIZED, FILED AND SENT TO CLIENT, OPPOSING COUNSEL AND JA RESPONSE/OBJECTION TO MOTION FOR PROTECTIVE ORDER	0.20 175.00/hr	35.00

		<u>Hrs/Rate</u>	<u>Amount</u>
1/24/2024	IR REVIEW RESPONSE TO MOTION FOR SANCTIONS .2 FORWARD TO CLIENT WITH NOTE REGARDING SAME .1	0.30 295.00/hr	88.50
	GRW REVIEWED RESPONSE FROM CORY, STAFF WITH IR REGARDING RESPONSE	0.20 650.00/hr	130.00
	MR STAFFING WITH IR REGARDING SANCTIONS RESPONSE AND REPLY DRAFT	0.20 425.00/hr	85.00
	IR MESSAGES WITH CLIENT .3 DRAFTING REPLY TO RESPONSE TO MOTION FOR SANCTIONS 1.0 STAFFING SAME WITH MR AND GW .3	1.60 295.00/hr	472.00
	MR REVISIONS TO REPLY TO MOTION FOR SANCTIONS PER IR REQUEST	0.20 425.00/hr	85.00
	IR MESSAGES WITH CLIENT REGARDING PENDING REPLY AND UPCOMING DEPOSITION	0.20 295.00/hr	59.00
1/25/2024	MB RECEIVED AND SENT TO CLIENT MINUTE ENTRIES	0.10 175.00/hr	17.50
	MB FINALIZED, FILED AND SENT TO CLIENT AND OPPOSING COUNSEL REPLY TO RESPONSE TO MOTION FOR SANCTIONS	0.20 175.00/hr	35.00
	MB EMAILED CLIENT VERIFICATION FOR AMENDED RESPONSE TO ESIGN	0.10 175.00/hr	17.50
	IR COMMUNICATION WITH CLIENT REGARDING CASE STATUS AND NEXT STEPS	0.20 295.00/hr	59.00
1/26/2024	IR REVIEW AND APPROVE AMENDED PET FOR FILING	0.20 295.00/hr	59.00
	MB FINALIZED, FILED AND SENT TO CLIENT AND OPPOSING COUNSEL AMENDED RESPONSE TO PETITION	0.20 175.00/hr	35.00
1/29/2024	GRW EMAIL FROM AMAZON REGARDING SPOILIATION NOTICE, STAFF WITH IR	0.20 650.00/hr	130.00
	GRW EMIAL TO CORY	0.40 650.00/hr	260.00
	IR CALL WITH CLIENT REGARDING DEPOSITION	0.10 295.00/hr	29.50
	IR STAFF WITH GREGG REGARDING CONTACT FROM ABC REGARDING LAURA'S ALLEGATIONS	0.30 295.00/hr	88.50
1/30/2024	IR CALL WITH LAWYERS FOR WARNER BROTHERS WITH GW REGARDING LAURA'S ALLEGATIONS	0.20 295.00/hr	59.00

		<u>Hrs/Rate</u>	<u>Amount</u>
1/30/2024	GRW CALL WITH LAWYERS FROM WARNER BROTHERS WITH IR	0.20 650.00/hr	130.00
	IR TC WITH CORY KEITH AND GW	0.30 295.00/hr	88.50
	GRW CALL WITH CORY REGARDING STATUS AND RESET CALL OFF PHONES TO NONRECORDED LINE	0.50 650.00/hr	325.00
	GRW CALL WITH CLEINT TO DEBRIEF MEETING WITH CORY, STAFF WITH IR	0.40 650.00/hr	260.00
1/31/2024	GRW PREP WITH CLAYTON FOR DEPO	0.50 650.00/hr	325.00
	IR DEPOSITION PREP WITH CLIENT AND GW	0.20 295.00/hr	59.00
	GRW STAFF WITH IR REGARDING LETTERS TO OC	0.10 650.00/hr	65.00
	IR DRAFT EMAILS WITH GW TO SEND TO OPPOSING COUNSEL REGARDING ONGOING DEPOSITION	0.30 295.00/hr	88.50
	IR EDITING EMAILS TO SEND TO OPPOSING COUNSEL REGARDING DEPOSITION AND LITIGATION STAFF WITH GW REGARDING SAME	0.20 295.00/hr	59.00
	IR EMAIL TO THE COURT REGARDING STATUS OF MINUTE ENTRY	0.10 295.00/hr	29.50
2/1/2024	IR REVIEW REPLY TO RESPONSE TO MOTION FOR CONFIDENTIALITY FORWARD TO CLIENT FOR REVIEW OF SAME	0.20 295.00/hr	59.00
	GRW CALL TO PPD PER EMAIL WTH CORY AND THEY WANT US TO CALL CRIMESTOP IN AM BEFORE DEPO	0.20 650.00/hr	130.00
	IR STAFFING ECHARD WITH GW	1.00 295.00/hr	NO CHARGE
	GRW EMAIL TO CORY	0.10 650.00/hr	65.00
	IR INITIAL DRAFTING OF MOTION TO COMPEL RULE 49 DISCLOSURE 1.0 LEGAL RESEARCH, REVIEW OF PRIOR PLEADINGS BY OPPOSING PARTY.5	1.50 295.00/hr	442.50
	GRW EMAIL WITH CORY'S OFFICE REGARDING MEETING AND CONF	0.10 650.00/hr	65.00

			<u>Hrs/Rate</u>	<u>Amount</u>
2/2/2024	MB	RECEIVED AND SENT TO CLIENT MINUTE ENTRY REGARDING HEARING	0.10 175.00/hr	17.50
	IR	FINAL DEPOSITION PREP, TRAVEL TO DEPOSITION, DEPOSITION, TRAVEL BACK	5.00 295.00/hr	1,475.00
	GRW	FINAL DEPOSITION PREP, TRAVEL TO DEPOSITION, DEPOSITION, TRAVEL BACK WITH IR	5.00 650.00/hr	3,250.00
2/5/2024	LC	FIRST DRAFT OF MTC AND REQUEST ADDITIONAL TRIAL TIME, EMAIL TO IR FOR REVIEW	0.80 175.00/hr	140.00
	IR	EDITS AND REVISIONS TO DRAFT MX TO CONTINUE AND MX FOR ADDITIONAL TIME	0.30 295.00/hr	88.50
	GRW	REVISE MOTION, EMIAL TO CORY REGARDING MOTION	0.30 650.00/hr	195.00
	MB	PREPPED OUTLINE DRAFT OF PROPOSED ORDERS FOR MOTION TO COMPEL AND MOTION TO CONTINUE FOR ATTORNEY	0.30 175.00/hr	52.50
2/6/2024	IR	EDITS TO MOTION TO CONTINUE AND FOR ADDITIONAL TIME	0.30 295.00/hr	88.50
	GRW	REVISE MOTION AND STAFF WITH IR	0.30 650.00/hr	195.00
	IR	EDITS TO AND CLEAN UP OF MOTION TO CONTINUE AND REQUEST FOR ADDITIONAL TIME, PREPARATION FOR REVIEW BY CLIENT, EMAIL TO CLIENT REGARDING SAME TO REVIEW	0.20 295.00/hr	59.00
	MB	FINALIZED, FILED AND SENT TO CLIENT, OPPOSING PARTY AND JA EXPEDITED MOTION TO CONTINUE AND MOTION FOR ADDITIONAL TIME	0.20 175.00/hr	35.00
	MB	EMAILED CLIENT VERIFICATION TO ESIGN	0.10 175.00/hr	17.50
2/8/2024	GRW	EMAIL TO CORY REGARDING DISCLSoure DEFICIT, STAFF WITH IR REGARDING SAME	0.20 650.00/hr	130.00
	IR	STAFF WITH GW; DRAFT EMAIL TO CORY KEITH	0.20 295.00/hr	59.00
2/9/2024	IR	STAFF WITH GW AND DRAFTING EMAIL TO OPPOSING PARTY	0.50 295.00/hr	147.50
2/12/2024	IR	DRAFT AND EDITS TO LETTER BY GW	0.30 295.00/hr	88.50

		<u>Hrs/Rate</u>	<u>Amount</u>
2/12/2024	LC INITIAL DRAFT OF MOTION TO SET STATUS CONFERENCE	0.80 175.00/hr	140.00
	IR REVIEW AND EDIT DRAFT EXPEDITED MOTION TO SET STATUS CONFERENCE	0.30 295.00/hr	88.50
	LC DRAFT PROPOSED ORDER REGARDING STATUS CONFERENCE	0.10 175.00/hr	17.50
	GRW REVISIONS TO MOTION AND ORDER	0.40 650.00/hr	260.00
	IR CLEAN UP DRAFT MOTION TO SET PER STAFF WITH GW, COORDINATING AND SAVING EXHIBITS FOR SAME	0.20 295.00/hr	59.00
	IR STARTED DRAFT REQUEST FOR FINDINGS OF FACT AND CONCLUSIONS OF LAW	1.00 295.00/hr	295.00
	MB FINALIZED, FILED AND SENT TO CLIENT, JA AND OPPOSING COUNSEL EXPEDITED MOTION TO SET STATUS CONFERENCE	0.20 175.00/hr	35.00
	IR STAFF WITH GW; DRAFT ORDER REGARDING PROPOSED FINDINGS AND CONCLUSIONS OF LAW	0.20 295.00/hr	59.00
2/13/2024	GRW EMAIL EXCHANGE WITH CLAYTON REGARDING STATUS AND REGARDING HEARING NEXT WEEK, STAFF WITH IR REGARDING SAME	0.20 650.00/hr	130.00
	IR STAFF WITH GW; EDITS TO FINDINGS OF FACT CONCLUSIONS OF LAW	0.30 295.00/hr	88.50
	IR LEGAL RESEARCH INTO HIPAA COMPLIANCE	0.30 295.00/hr	88.50
2/14/2024	IR LEGAL RESEARCH AND CASE LAW REVIEW; DRAFT LETTER TO CORY REGARDING SETTLEMENT	0.40 295.00/hr	118.00
	IR EDITS TO DRAFT LETTER TO CORY REGARDING SETTLEMENT	0.40 295.00/hr	118.00
	IR ANOTHER ROUND OF EDITS FOR LETTER TO CORY REGARDING SETTLEMENT DRAFT AND FINALIZE NOTICE OF DEPOSITION FOR MARCH 1 STAFF WITH GW REGARDING SAME	0.30 295.00/hr	88.50
	GRW EMAIL TO CORY	0.20 650.00/hr	130.00
2/15/2024	GRW DRAFT LETTER TO POTENTIAL EXPERT	0.80 650.00/hr	520.00

			<u>Hrs/Rate</u>	<u>Amount</u>
2/15/2024	IR	REVIEW MINUTE ENTRY SETTING STATUS CONFERENCE; FORWARD TO CLIENT	0.20 295.00/hr	59.00
	IR	DRAFT EMAIL TO CORY REGARDING YET ANOTHER MEDIUM ARTICLE	0.70 295.00/hr	206.50
	IR	STAFF WITH GW; ROUND II EDITS TO LETTER TO CORY REGARDING MEDIUM ARTICLE	0.30 295.00/hr	88.50
2/16/2024	IR	REVIEW MINUTE ENTRY DENYING MOTION TO QUASH; FORWARD TO CLIENT WITH NOTE	0.20 295.00/hr	59.00
	IR	EMAIL FROM CLIENT REGARDING DEPOSITION; RESPONSE TO SAME	0.20 295.00/hr	59.00
2/19/2024	GRW	EMAIL WITH CORY, STAFF WITH IR REGARDING SAME, INVOICE AND SUMMARY TO INCLUDE IN EMAIL	0.30 650.00/hr	195.00
	IR	STAFF UPDATES WITH GW; EDITS TO DRAFT RESPONSE TO OPPOSING COUNSEL	0.30 295.00/hr	88.50
2/20/2024	GRW	EMAIL FROM COURT REPORTER OFFICE, AND LETTER TO CLIENT REGARDING STATUS .2 STAFF WITH IR REGARDING TO DOS .1	0.30 650.00/hr	195.00
	IR	STAFF WITH GW REGARDING RESEARCH PREP FOR SC TOMORROW PER GW REQUEST	0.30 295.00/hr	88.50
	GRW	EMAIL WITH CORY REGARDING MEETING TOMORROW	0.10 650.00/hr	65.00
2/21/2024	GRW	REVIEWED TWO ORDERS, CALL TO CLAYTON TO DISCUSS AND PREP FOR TODAY	0.20 650.00/hr	130.00
	GRW	EMAIL TO CLAYTON REGARDING NEW MINUTE ENTRIES	0.10 650.00/hr	65.00
	LC	REVIEW EXHIBITS AND COMPILE COMPARISON OF COMMUNICATIONS WITH LO	0.90 175.00/hr	157.50
	MB	RECEIVED AND SENT TO CLIENT NOTICE OF CHANGE OF FIRM	0.10 175.00/hr	17.50
	GRW	FINAL HEARING PREP, TRAVEL TO COURT, HEARING, DEBRIEF WITH CLIENT, RETURN TO OFFICE	2.00 650.00/hr	1,300.00
	IR	TRAVEL TO COURT; STATUS CONFERENCE; TRAVEL BACK COURTESY DISCOUNT .5	1.50 295.00/hr	442.50
	IR	RESEARCH THROUGH FILES; LIST OF NAMES OF PROVIDERS SENT TO COURT PER REQUEST BY JUDGE MATA	0.30 295.00/hr	88.50

			<u>Hrs/Rate</u>	<u>Amount</u>
2/22/2024	IR	STAFF WITH GW; RESEARCH INTO LO CLAIM OF MISCARRIAGE	0.30 295.00/hr	88.50
	IR	EDITS TO DRAFT LETTER TO PROVIDERS REGARDING HIPAA RELEASE	0.30 295.00/hr	88.50
2/23/2024	GRW	MEETING WITH STAFF TO REVIEW EVIDENCE AND DOCU REVIEW REGARDING PRIOR TESTIMONY IN HEARINGS PER COURTS RULING	0.60 650.00/hr	390.00
	IR	STAFF WITH GW AND MS REGARDING DEPO, HIPAA AND NEXT STEPS	0.40 295.00/hr	118.00
	IR	EMAIL TO MARICOPA COUNTY REPORTING SERVICES REGARDING NEED FOR VIDEOGRAPH AND STENO FOR DEPO MARCH 1	0.20 295.00/hr	59.00
	IR	COORDINATION OF ALL HIPAA RELEASES; LETTERS AND SIGNATURES OF GW; PREPARATION OF ENVELOPES; CALL PROVIDERS TO CONFIRM EMAIL ADDRESSES FOR DISPATCH	1.00 175.00/hr	175.00
	IR	7X EMAIL OF HIPAA RELEASE AND LETTER TO PROVIDERS; CALL TO DR. HIGLEYS OFFICE FOR EMAIL ADDRESS; EMAIL REGARDING SAME	0.70 295.00/hr	206.50
2/24/2024	GRW	STAFF REGARDING DISCLOSURE, FIRST DRAFT OF LETTER TO CORY REGARDING INFO ALREADY RELEASED	0.30 650.00/hr	195.00
2/26/2024	GRW	COMP RECORDS REGARDING DOCS PROVIDED BY LAURA REVIEWED, STAFF WITH CLERK REGARDING EXHIBIT MASTER LIST	0.40 650.00/hr	260.00
	IR	REVIEW DISCLOSURE/AUDIO PROVIDED BY OPPOSING PARTY; FORWARD TO CLIENT	0.40 295.00/hr	118.00
	IR	REVIEW POSSIBLE DISCLOSURE RECEIVED	0.30 295.00/hr	88.50
	IR	STAFF WITH GW; EDITS TO DRAFT LETTERS TO CORY AND OTHERS	0.50 295.00/hr	147.50
	LC	PREPARE AND REORGANIZE EXHIBITS FOR DEPOSITION ON 3/1	1.60 175.00/hr	280.00
	LC	STAFF WITH GRW AND IR REGARDING FURTHER DEPO PREP, FILL OUT NEW HIPAA RELEASE AND CONTINUE TO PREPARE DEPO EXHIBITS	1.10 175.00/hr	192.50
	GRW	DRAFT LETTER TO SARAH AND CORY REGARDING DISCOVERY	0.40 650.00/hr	260.00

		<u>Hrs/Rate</u>	<u>Amount</u>
2/26/2024	MB RECEIVED AND SENT TO CLIENT MINUTE ENTRY RE TRIAL	0.10 175.00/hr	17.50
	LC FINISH PREPARATION OF DEPO EXHIBITS FOR ATTY REVIEW	2.00 175.00/hr	350.00
	IR REVIEW OF DEPOSITION DOCUMENTS WITH LAW CLERK	0.50 295.00/hr	147.50
	IR CALL FROM SCOTTSDALE PERINATAL CONFIRMING NO RECORDS EXIST	0.20 295.00/hr	59.00
	GRW INTERVIEW WITH WITNESS MM	0.50 650.00/hr	325.00
	IR CALL WITH GW AND MIKE MARRACCINI	0.50 295.00/hr	147.50
2/27/2024	IR WORK ON DEPO PREP AND GATHERING EXHIBITS; STAFF WITH GW	0.50 295.00/hr	147.50
	GRW WITNESS INTERVEIW COLLIN	0.30 650.00/hr	195.00
	IR CALL WITH WITNESS COLIN SCANLON; STAFF WITH GW	0.30 295.00/hr	88.50
	GRW DRAFT LETTER TO SCANLON WITNESS	0.30 650.00/hr	195.00
	GRW INTERVEIW EXPERTS, STAFF WITH IR	0.40 650.00/hr	260.00
	GRW EMAIL TO SCANLON	0.30 650.00/hr	195.00
	IR EMAIL FROM SMIL; RESPONSE WITH MINUTE ENTRY .1; EMAIL WITH CREDIT CARD INFORMATION FOR HIPAA; RESPONSE TO SAME .1	0.20 295.00/hr	59.00
	GRW LETTER DIRECTLY FROM LAURA .2 FULL STAFFING WITH TEAM .2, EMAIL TO CORY .1, CALL WITH CE TO DISCUSS LETTER AND SENT DURING CALL, GAVE PERMISSION TO RELEASE LETTER AT OUR DISC .2	0.70 650.00/hr	455.00
2/28/2024	GRW STAFF WITH LAW CLERK REGARDING EXHIBITS AND REGARDING NEW EXHIBIT FROM LAURA DIRECTLY	0.20 650.00/hr	130.00
	IR REVIEW LETTER FROM LAURA; STAFF WITH GW; EDITS TO DRAFT LETTER TO OPPOSING COUNSEL	0.30 295.00/hr	88.50

		<u>Hrs/Rate</u>	<u>Amount</u>	
2/28/2024	LC	PREP DEPO EXHIBITS, WATCH PREVIOUS FTR AND MAKE NOTE OF TimestAMPS FOR SPECIFIC STATMENTS DURING PREVIOUS TESTIMONY	1.70 175.00/hr	297.50
	GRW	EMAIL FROM CORY, EMIAL TO CORY, EMAIL TO CLAYTON REGARDING SAME	0.20 650.00/hr	130.00
	IR	STAFF WITH GW; GO THROUGH DEPOSITION EXHIBITS AND DRAFTING DEPO QUESTIONS	1.00 295.00/hr	295.00
	GRW	DEPOSTION PREP WITH IR	1.00 650.00/hr	650.00
	IR	EMAIL TO SCOTTSDALE PERINATOLOGIST REGARDING HIPAA RECORDS	0.10 295.00/hr	29.50
	IR	MORE WORK COORDINATING EXHIBITS; TIME STAMPS AND QUESTIONS FOR DEPOSITION	0.80 295.00/hr	236.00
	GRW	EMAIL FROM SCANLON, DISCLOSURE LETTER TO CORY	0.20 650.00/hr	130.00
	IR	EDITS TO DRAFT CONSULTATION AGREEMENTS AND DISPATCH OF SAME TO DRS	0.30 295.00/hr	88.50
	MB	PREPARED BINDERS FOR DEPOSITION X3	1.00 175.00/hr	175.00
	GRW	EMAIL WITH CORY AND STAFF REGARDING RESPONDING TO COMMENTS ABOUT SEAL/PUBLICITY	0.50 650.00/hr	325.00
2/29/2024	IR	EMAILS WITH MARICOPA REPORTING CONFIRMING DEPOSITION TOMORROW AND NEED FOR VIDEO AND REPORTER .3	0.30 295.00/hr	88.50
	GRW	DEPO AND EXHIBIT PREP	1.00 650.00/hr	650.00
	IR	STAFF DEPOSITION AND EXHIBITS WITH GW AND MB	0.70 295.00/hr	206.50
	MB	UPDATED EXHIBITS FOR DEPOSITION UPDATED BINDERS X3 AND MADE BINDER 4	0.50 175.00/hr	87.50
	MB	DEPOSITION PREP WITH GREGG AND ISABEL	1.00 175.00/hr	175.00
	IR	STAFF WITH GW; ADDITIONAL EXHIBITS ADDED TO DEPOSITION AND QUESTION LIST CHANGED ACCORDINGLY	0.30 295.00/hr	88.50

			<u>Hrs/Rate</u>	<u>Amount</u>
2/29/2024	GRW	DOCS REVIEWED REGARDING RONN OWENS WHO POSTED ABOUT PREGNANCY, STAFF WITH IR	0.20 650.00/hr	130.00
3/1/2024	IR	PREP FOR DEPO; DEPOSITION OF LAURA OWENS	4.00 295.00/hr	1,180.00
	GRW	FINAL DEPO PREP, FULL DEPOSITION	5.10 650.00/hr	3,315.00
	MB	RECEIVED AND SENT TO OPPOSING COUNSEL RESPONSES FROM HONOR HEALTH	0.20 175.00/hr	35.00
3/3/2024	GRW	EMAIL WITH SMIL REGARDING TAMPERED RECORDS	0.40 650.00/hr	260.00
3/4/2024	GRW	EMAIL WITH [REDACTED] S ATTORNEY	0.20 650.00/hr	130.00
	LC	FIND UPDATED CONTACT INFO FOR PLANNED PARENTHOOD CA LOCATION, CREATE NEW HIPAA RELEASE LETTER AND SAVE TO FILE	0.40 175.00/hr	70.00
	IR	EDITS TO LETTER AND EMAIL TO PLANNED PARENTHOOD MISSION VIEJO WITH HIPAA ETC	0.20 295.00/hr	59.00
	MB	EMAILED OPPOSING COUNSEL EXHIBITS FROM DEPOSITION	0.20 175.00/hr	35.00
	IR	STAFF WITH GW; EDITS TO DRAFT LETTER TO CORY REGARDING DEPO FOLLOW UP AND RECORDS X3	0.40 295.00/hr	118.00
	GRW	EMAIL TO CORY REVISED, NOTE TO CLAYTON	0.50 650.00/hr	325.00
	IR	DRAFT LETTER TO [REDACTED] ATTORNEY IN [REDACTED] MATTER FROM SANFRANCISCO.2 DRAFT EMAIL TO CEO OF SMIL WITH ATTACHMENTS FOR GW .1	0.30 295.00/hr	88.50
	IR	EMAIL TO CONSULTANTS; CREATION OF DROPBOX LINK; NOTE TO SCHEDULE CALL	0.20 295.00/hr	59.00
	GRW	REVISIONS TO LETTER AND DISPATCH TO [REDACTED] ATTORNEY IN CA	0.20 650.00/hr	130.00
3/5/2024	GRW	WITNESS INTERVIEW REGARDING PRIOR FALSE PREGNANCY CLAIMS	0.30 650.00/hr	195.00
	IR	VIDEO CALL WITH MEDICAL CONSULTANTS AND GW	0.50 295.00/hr	147.50
3/6/2024	GRW	EMAIL EXCHANGE REGARDING OTHER VICTIMS AND CONTACT FROM SOURCES REGARDING SAME	0.30 650.00/hr	195.00

		<u>Hrs/Rate</u>	<u>Amount</u>
3/6/2024	IR EDITS TO RELEASE	0.40 295.00/hr	118.00
	GRW CALL WITH CLAYTON REGARDING RELEASE DRAFT	0.80 650.00/hr	520.00
3/7/2024	IR EMAILS BACK AND FORTH WITH GW AND CLIENT REGARDING RELEASE; EDITS TO SAME; STAFF WITH GW	0.30 295.00/hr	88.50
	MB RECEIVED, BATE STAMPED AND DRAFTED 1ST SUPPLEMENTAL DISCLOSURE STATEMENT	0.50 175.00/hr	87.50
	MB FINALIZED AND SENT TO CLIENT AND OPPOSING COUNSEL 1ST SUPPLEMENTAL DISCLOSURE STATEMENT	0.20 175.00/hr	35.00
	IR REVIEW AND APPROVE FIRST SUPP DISCLOSURE	0.20 295.00/hr	59.00
3/8/2024	IR EDITS TO DRAFT EMAIL TO CORY REGARDING MX TO COMPEL .2; STAFF WITH GW REGARDING SAME .1	0.30 295.00/hr	88.50
	GRW EMAIL TO CORY, EMAIL TO CLIENT REGARDING STATUS	0.40 650.00/hr	260.00
3/11/2024	IR EMAIL FROM CONSULTANT REGARDING SONOGRAM; RESPONSE TO SAME	0.20 295.00/hr	59.00
	MB EMAILED COURT REPORTER EXHIBITS	0.10 175.00/hr	17.50
	IR HIPAA RELEASE WOMENS CARE UPDATE EMAIL	0.10 295.00/hr	29.50
	IR DRAFT MOTION TO COMPEL	1.00 295.00/hr	295.00
	GRW REVISE MOTION TO COMPEL	0.30 650.00/hr	195.00
	IR STAFF WITH GW; EDITS TO MOTION TO COMPEL x2 (.3 EACH)	0.60 295.00/hr	177.00
	IR STAFF WITH GW REGARDING MOTION TO COMPEL; MORE EDITS TO SAME; DRAFT GOOD FAITH CONSULTATION AND VERIFICATION; PULL AND SELECT EXHIBITS	0.40 295.00/hr	118.00
	GRW MORE REVISIONS TO MOTION AND CALL WITH CLAYTON REGARDING SAME	0.50 650.00/hr	325.00
	MB FINALIZED, FILED AND SENT TO CLIENT, OPPOSING COUNSEL AND JUDGE'S ASSISTANT MOTION TO COMPEL	0.20 175.00/hr	35.00

		<u>Hrs/Rate</u>	<u>Amount</u>
3/12/2024	GRW RECEIVED AND SENT TO CLIENT MOTION TO WITHDRAW	0.20 650.00/hr	130.00
3/13/2024	GRW DISCLOSURE LETTER	0.40 650.00/hr	260.00
	IR ASSISTANCE DRAFTING LETTER TO CORY REGARDING MOTION TO WITHDRAW	0.30 295.00/hr	88.50
3/15/2024	IR TC WITH WOMENS HEALTH CONFIRMING NO RECORDS	0.20 295.00/hr	59.00
	IR DRAFT LETTER TO CORY REGARDING WOMENS CARE HAVING NO RECORDS FOR GW; FORWARD TO CLIENT	0.20 295.00/hr	59.00
	IR EMAIL FROM CLIENT; STAFF OOP ISSUE WITH GW; RESPONSE TO CLIENT REGARDING SAME	0.30 295.00/hr	88.50
3/18/2024	GRW DISCLOSURE REVIEWED, EMAIL TO CORY REGARDING SAME	0.20 650.00/hr	130.00
	IR DRAFT EMAIL TO SARAH NAVARRO PER STAFF WITH GW	0.20 295.00/hr	59.00
	IR REVIEW DEPOSITION TRANSCRIPT .4; DRAFT EMAIL TO CONSULTANTS WITH SPECIFIC PAGES AND RELEVANT INFORMATION FOR THEIR REVIEW .3	0.70 295.00/hr	206.50
	IR EMAIL TO DOCTOR CONSULTATIONS WITH INFORMATION FOR THEIR REVIEW	0.10 295.00/hr	29.50
	MB RESEARCHED SARA OWENS CONTACT INFORMATION AND PREPARED SUBPOENA FOR TRIAL APPEARANCE	0.50 175.00/hr	87.50
	GRW EMAIL WITH MORE DISCLOSURE TO CORY, COVER LETTER TO SARAH REGARDING SUBPOENA	0.60 650.00/hr	390.00
3/19/2024	IR EMAIL FROM CONSULTANTS X2, RESPONSE TO SAME	0.20 295.00/hr	59.00
	IR REVIEW ME WITHDRAWING CORY; FORWARD TO CLIENT	0.20 295.00/hr	59.00
3/20/2024	IR REWATCH PARTS OF OCT 25 OOP HEARING DRAFTING AND RESEARCH FOR MX FOR RELIEF FROM JUDGMENT	1.50 295.00/hr	442.50
3/21/2024	GRW CALL WITH NEW ATTORNEY SAYING THEY MIGHT BE TAKING CASE REGARDING STATUS BUT NO NOA YET	0.30 650.00/hr	195.00

		<u>Hrs/Rate</u>	<u>Amount</u>
3/21/2024	IR STAFF WITH GW; CONTINUED EDITING AND DRAFTING OF MX FOR RELIEF FROM JUDGMENT AND RESEARCH REGARDING SAME	0.60 295.00/hr	177.00
	IR DRAFT EMAIL TO PP REGARDING RECORDS TAMPERING; REDACTIONS OF DEPOSITION	0.30 295.00/hr	88.50
	GRW EMAIL WITH PLANNED PARENT HOOD AFTER REVIEWING RECORDS NOT MATCHING CLAIMS FROM LAURA	0.30 650.00/hr	195.00
	IR CONTINUED DRAFTING AND RESEARCH FOR MOTION FOR RELIEF FROM JUDGMENT	1.00 295.00/hr	295.00
	GRW FIRST ROUND OF GW REVISIONS TO MOTION	0.30 650.00/hr	195.00
	GRW T/C CLAYTON REGARDING STATUS OF FILING REGARDING SET ASIDE	0.20 650.00/hr	130.00
3/22/2024	IR EDITS TO DRAFT MX FOR RELIEF	0.30 295.00/hr	88.50
3/25/2024	IR LEGAL RESEARCH AND DRAFT MOTION FOR JOINT HEARING; STAFF WITH GW AND ADDITIONAL EDITS	0.50 295.00/hr	147.50
	GRW REVISE MOTION AND STAFF WITH IR	0.20 650.00/hr	130.00
	IR ORCHESTRATION OF EXHIBITS AND FINAL REVIEW OF MOTION FOR RELIEF AND MOTION FOR JOINT HEARING	0.30 295.00/hr	88.50
	MB FINALIZED, FILED AND SENT TO CLIENT AND OPPOSING COUNSEL MOTION FOR JOINT HEARING AND MOTION FOR RELIEF FROM JUDGEMENT	0.40 175.00/hr	70.00
3/26/2024	GRW EMAIL WITH NEW ATTORNEY DAVID GINGRAS	0.40 650.00/hr	260.00
	GRW RECEIVED AND SENT TO CLIENT NOTICE OF APPEARANCE	0.20 650.00/hr	130.00
	GRW CALL WITH CONSULTING GYNOS	0.50 650.00/hr	325.00
	IR ZOOM WITH GW AND CONSULTANTS REGARDING MEDICAL RECORDS REVIEWED	0.60 295.00/hr	177.00
	GRW CALL WITH NEW ATTORNEY	0.70 650.00/hr	455.00

			<u>Hrs/Rate</u>	<u>Amount</u>
3/26/2024	IR	TC WITH NEW OPPOSING COUNSEL AND GREGG	0.70 295.00/hr	206.50
	IR	UPLOAD DOCUMENTS TO DROPBOX LINK PER OPPOSING COUNSEL REQUEST; SEND TO OPPOSING PARTY WITH NOTE REGARDING SAME	0.20 295.00/hr	59.00
3/27/2024	IR	STAFF WITH GW; DRAFT EMAIL RESPONSE TO NEW OPPOSING COUNSEL	0.30 295.00/hr	88.50
	GRW	DRAFT AND REVISE LETTER TO NEW COUNSEL AND REVIEW FACTS REGARDING SAME	0.30 650.00/hr	195.00
	IR	ADDITIONAL ROUND OF EDITS TO LETTER	0.20 295.00/hr	59.00
	GRW	MORE REVISIONS TO COUNTER LETTER	0.30 650.00/hr	195.00
	IR	EDITS TO LETTER TO OPPOSING COUNSEL ROUND 3	0.20 295.00/hr	59.00
	IR	DRAFT EMAIL TO OPPOSING COUNSEL REGARDING POS HCG TESTS AND STAFF WITH GW	0.40 295.00/hr	118.00
3/28/2024	GRW	EMAIL TO EXPERT NEUMEISTER	0.20 650.00/hr	130.00
	IR	STAFF ECHARD WITH GW REGARDING SUPP DISCLOSURE	0.20 295.00/hr	59.00
	IR	TC WITH CLIENT REGARDING HIS PLAN MOVING FORWARD; STAFF WITH GW	0.20 295.00/hr	59.00
	MB	DRAFTED 2ND SUPPLEMENTAL DISCLOSURE STATEMENT FOR ATTORNEY	0.50 175.00/hr	87.50
	GRW	EMIAL FROM DAVID, STAFF WITH IR REGARDING DISCLOSURE SUBSTANCE	0.20 650.00/hr	130.00
	IR	EDITS TO 2ND SUPP DISCLOSURE TO INCLUDE EXPERTS; CROSS CHECK WITH RESEARCH AND CVS	0.40 295.00/hr	118.00
	IR	UPDATES TO SUPP DISCLOSURE STATEMENT PER STAFF WITH GW	0.20 295.00/hr	59.00
	MB	UPDATED 2ND SUPPLEMENTAL DISCLOSURE STATEMENT WITH WITNESS CONTACT INFORMATION	0.40 175.00/hr	70.00
3/29/2024	IR	EDITS TO DRAFT EMAIL TO DAVID REGARDING ALLEGED PHOTOS	0.20 295.00/hr	59.00

		<u>Hrs/Rate</u>	<u>Amount</u>
3/29/2024	MB EMAILED OPPOSING COUNSEL EXHIBITS FROM DEPOSITION	0.20 175.00/hr	35.00
	MB FINALIZED AND SENT TO CLIENT AND OPPOSING COUNSEL 2ND SUPPLEMENTAL DISCLOSURE STATEMENT	0.20 175.00/hr	35.00
3/31/2024	GRW REVIEWED NUMEROUS EMAILS FROM DAVID GINGRAS OVER EASTER WEEKEND	0.30 650.00/hr	195.00
4/1/2024	IR STAFF WITH GW REGARDING RESPONSES TO OC	0.50 295.00/hr	147.50
	IR REVIEW EMAILS AND CITATIONS PER OPPOSING COUNSEL AND STAFFING WITH MR AND GW; RESPONSE EMAIL DRAFTED PER STAFF	0.40 295.00/hr	118.00
	GRW 4 LETTERS FROM GINGRAS, STAFF WITH IR, ROUGH DRAFT RESPONSE	0.50 650.00/hr	325.00
	IR EMAIL FROM OPPOSING COUNSEL; STAFF WITH GW; RESPONSE EMAIL WITH RESEARCH	0.30 295.00/hr	88.50
	GRW RECEIVED AND SENT TO CLIENT MOTION FOR EXTENSION OF TIME	0.20 650.00/hr	130.00
	GRW CALL WITH OPPOSING COUNSEL AND DEBRIEF CALL WITH IR	0.60 650.00/hr	390.00
	GRW STAFF WITH MR REGARDING RESPONDING TO MOTION AND STRATEGY	0.50 650.00/hr	325.00
4/2/2024	GRW EMAILS REGARDING NEW PUBLICATION FROM GINGRAS	0.20 650.00/hr	130.00
	GRW MEETING WITH MR TO VET RESEARCH AND OPTIONS REGARDING SANCTIONS MOTION AND CASE LAW THAT DOES NOT COMPORT WITH LO'S ARGUMENT, SUBSEQUENT STAFFING WITH IR REGARDING SAME TO REVIEW CASE LAW AND DISCUSS STRATEGY IN LIGHT OF FILING	1.20 650.00/hr	780.00
	GRW EMAIL EXCHANGEREGARDING LOs POSTINGS RELATED TO NEWEST "SA" CLAIM	0.20 650.00/hr	130.00
4/3/2024	IR STAFF WITH GW; DRAFT PROPOSED ORDER AND EDITS TO LETTER TO DAVID	0.40 295.00/hr	118.00
	GRW 3 EMAILS FROM DAVID REVIEWED AND STAFFED AS ONE WAS OVERTLY THREATING, CALL TO BAR COUNSEL ETHICS HOTLINE, 1.2 FIRST DRAFT RESPONSE TO DAVID BUT WILL HOLD FOR	1.50 650.00/hr	975.00

			<u>Hrs/Rate</u>	<u>Amount</u>
		ETHICS ADVICE 2 EMAIL TO [REDACTED]		
4/3/2024	IR	EDITS TO DRAFT MOTION TO WITHDRAW RULE 26 .5; STAFF WITH MR AND GW REGARDING SAME .1	0.60 295.00/hr	177.00
	MR	EDITS TO DRAFT MOTION TO WITHDRAW AND LEGAL RESEARCH REGARDING SAME AND STAFF WITH IR	3.50 425.00/hr	1,487.50
	GRW	CALL WITH CLAYTON TO ADDRESS FILING, HE VERFIED, STAFF WITH IR REGARDING TASKS TO GET THIS FILED	0.40 650.00/hr	260.00
	MB	FINALIZED, FILED AND SENT TO CLIENT, OPPOSING COUNSEL AND JUDGE'S ASSISTANT MOTION TO WITHDRAW MOTION FOR SANCTIONS	0.20 175.00/hr	35.00
4/4/2024	IR	EMAILS FROM DAVID GRINGAS AND REVIEW NEW FILING; STAFF WITH GW	0.30 295.00/hr	88.50
	GRW	EMAILED OPPOSING COUNSEL RESPONSE TO REQUEST TO MEET AND CONFER	0.30 650.00/hr	195.00
4/5/2024	GRW	CALL WITH NEUMEISTER REGARDING EXPERT WORK AND WAITING FOR RECORDS	0.30 650.00/hr	195.00
	IR	STAFF WITH GW; EMAIL TO EXPERTS REGARDING REPORT	0.10 295.00/hr	29.50
	IR	STAFF WITH GW REGARDING COMMUNICATION WITH GRINGAS	0.30 295.00/hr	88.50
	GRW	EMAIL FROM GINGRAS, STAFF REGARDING SAME, EMAIL TO GINGRAS REGARDING SAME	0.40 650.00/hr	260.00
	GRW	EMAIL FROM GINGRAS AGAIN, STAFF WITH DA AND IR	0.30 650.00/hr	195.00
4/8/2024	MB	RECEIVED, BATE STAMPED AND DRAFTED 3RD SUPPLEMENTAL DISCLOSURE STATEMENT	0.40 175.00/hr	70.00
	IR	STAFFING ECHARD CASE WITH GW	0.20 295.00/hr	59.00
	GRW	RECEIVED AND SENT TO CLIENT MOTION FOR LUNCH WITH COMMENTS	0.20 650.00/hr	130.00
	GRW	MOTION FROM GINGRAS, STAFF WITH IR	0.30 650.00/hr	195.00
	GRW	REVIEWED EMAIL, EMAIL TO DAVID GINGRAS	0.30 650.00/hr	195.00
	MB	FINALIZED AND SENT TO CLIENT AND OPPOSING COUNSEL 3RD SUPPLEMENTAL DISCLOSURE STATEMENT	0.20 175.00/hr	35.00

		<u>Hrs/Rate</u>	<u>Amount</u>
4/9/2024	GRW OUTLINE RESPONSE TO GINGRAS	0.40 650.00/hr	260.00
	IR DRAFT RESPONSE OBJECTION TO MOTION FOR LUNCH ETC	1.20 295.00/hr	354.00
	GRW FIRST DRAFT RESPONSE TO MOTION	1.40 650.00/hr	910.00
4/10/2024	GRW CONSULT REGARDING HOW TO RESPOND TO EMAILS FROM OPPOSING COUNSEL WITHOUT ESCALATION	0.20 650.00/hr	130.00
	GRW RECEIVED AND SENT TO CLIENT MINUTE ENTRY RE GRANTING MOTION TO COMPEL	0.20 650.00/hr	130.00
	IR EDITS TO RESPONSE TO MOTION FOR LUNCH; .8 SECOND AND THIRD ROUNDS OF REVISIONS; .4 STAFF WITH GW .2	1.40 295.00/hr	413.00
	GRW REVISIONS AND IMPORTED QUOTES SECTIONS TO RESPONSE	0.50 650.00/hr	325.00
	GRW MORE REVISIONS TO RESPONSE	0.40 650.00/hr	260.00
	MB FINALIZED, FILED AND SENT TO CLIENT, OPPOSING COUNSEL AND JUDGE'S ASSISTANT RESPONSE TO MOTION FOR LUNCH	0.30 175.00/hr	52.50
	MB REDACTED EXHIBITS TO RESPONSE TO MOTION FOR LUNCH	0.40 175.00/hr	70.00
	GRW CALL WITH CLAYTON .2 REVIEW POSTINGS ONLINE AGAIN FROM GINGRAS AND BAR COMPLAINT POSTED ON WEB FROM LAURA ANDS STAFF WITH KB/MB .6 REVIEWED NEW DISCLOSURE AND STATEMENT, STAFF WITH IR .3	1.10 650.00/hr	715.00
	GRW EMAIL TO EXPERTS REGARDING RECORDS RECEIVED	0.20 650.00/hr	130.00
4/11/2024	GRW EMAIL ██████████ REGARDING CONCERNS RE OC ESCALATION	1.00 650.00/hr	650.00
	GRW CALL FROM ██████████	0.20 650.00/hr	130.00
	GRW CALL WITH EXPERT DOCTORS REGARDING IMAGES	0.50 650.00/hr	325.00

			<u>Hrs/Rate</u>	<u>Amount</u>
4/11/2024	GRW	TIMELINE EXHIBIT REVIEW AND STAFF WITH IR	0.20 650.00/hr	130.00
4/12/2024	GRW	REVIEWED NOTICE FILING AND DOCS FROM DAVID REGARDING GILLESPIE, EMIAL TO CLAYTON REGARDING SAME	0.40 650.00/hr	260.00
	GRW	EMAIL WITH FABIAN ZAZUETA	0.20 650.00/hr	130.00
	GRW	RECEIVED AND SENT TO CLIENT NOTICE OF APPEARANCE AND NOTICE RE PENDING MOTION	0.20 650.00/hr	130.00
	GRW	CALL WITH FZ REGARDING GILLESPIE INFO NOW PUBLIC BY GINGRAS	0.30 650.00/hr	195.00
4/15/2024	GRW	EMAIL WITH WITNESS COUNSEL REGARDING STATUS AND REVIEWED DOCS REGARDING SAME	0.20 650.00/hr	130.00
	IR	SCHEDULING TC WITH EXPERT DOCTORS	0.10 295.00/hr	29.50
	GRW	RECEIVED AND SENT TO CLIENT REPLY TO LUNCH	0.20 650.00/hr	130.00
	GRW	EMAIL FROM GINGRAS WITH DISCLOSURE THAT WE ALREADY HAVE REGARDING ULTRASOUND AND THEIR EXPERT	0.10 650.00/hr	65.00
	MB	DRAFTED ACCEPTANCE OF SERVICE	0.20 175.00/hr	35.00
	GRW	REVIEWED EMAIL, STAFF WITH IR, EMAIL TO DAVID REGARDING DOC AFTER CROSS REFERENCING THE INFORMATION WITH INFO ALREADY FROM PLANNED PARENTHOOD	0.30 650.00/hr	195.00
	IR	STAFF WITH GW; COORDINATION OF RECORDS REQUEST FOR ABUZZ LLC	0.30 295.00/hr	88.50
4/16/2024	GRW	STAFF WITH IR REGARDING DISCLOSURE STILL NEEDED	0.20 650.00/hr	130.00
	IR	COMMUNICATION WITH EXPERTS REGARDING PREGNANCY NARRATIVE	0.20 295.00/hr	59.00
	IR	TC WITH DOCTORS REGARDING EXPERT FINDINGS	0.80 295.00/hr	236.00
	GRW	EMAIL FROM GINGRAS WITH MORE DISCLOAURE WITHOUT META DATA, EMAIL TO EXPERT REGARDING SAME	0.20 650.00/hr	130.00
	GRW	EMAIL FROM GINGRAS WITH STILL NO META DATA AND HIS COMMENT "As such, I do not plan on responding to further questions about the photos since any additional discovery into that issue is not	0.40 650.00/hr	260.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	proportional to the needs of the case. See Rule 51(b)(1)(A). " CONTRARY TO SPECIFIC DISCOVERY ORDER, EMAIL TO NEUMEISTER REGARDING SAME AND STAFF RE HOW TO OBTAIN INFORMATION IF THEY ARE REFUSING TO PROVIDE ACTUAL META DATA		
4/16/2024	GRW EMAIL WITH FORENSIC EXPERT REGARDING WHAT IS NEEDED RE META DATA	0.20 650.00/hr	130.00
4/17/2024	GRW EMAIL TO GINGRAS REGARDING MISSING DATA ON PHOTOS .2 COM WITH CLIENT REGARDING NEWS STORIES REGARDING SAME AND GINGRAS POSTING REGARDING CASE AND PATERNITY .2	0.40 650.00/hr	260.00
	IR RESEARCH AND PROPOSED RESPONSE TO OPPOSING COUNSEL REGARDING METADATA; STAFF WITH GW	0.60 295.00/hr	177.00
	GRW EMAIL WITH DAVID REGARDING META DATA AFTER STAFFING WITH IR AND REVIEWING ANOTHER SCREENSHOT	0.20 650.00/hr	130.00
	GRW CALL WITH CLIENT REGARDING POLICE AND FRAUD SIMILAR TO BALLPLAYER IN NEWS WHOSE ACCUSER WAS PROSECUTED	0.30 650.00/hr	195.00
	GRW EMAIL WITH GINGRAS REGARDING IMAGES AND META DATA	0.20 650.00/hr	130.00
	GRW EMAIL FROM GINGRAS, EMAIL TO CLAYTON WITH COMMENTARY AND REGARDING POLICE INVOLVMENT	0.30 650.00/hr	195.00
4/18/2024	GRW EMAIL REGARDING VIDEO GINGRAS POSTED ON YOUTUBE, STAFF WITH IR	0.20 650.00/hr	130.00
	IR WORK ON FIRST DRAFT PTS	0.60 295.00/hr	177.00
	GRW REVIEWED MORE OF GINGRAS BIZZARE TWEETS AND POSTINGS, STAFF WITH MR, EMAIL TO DR	0.30 650.00/hr	195.00
4/19/2024	GRW EMIAL AND DOC REVIEW FROM GINGRAS POSTING AND THE AFFIDAVIT	0.20 650.00/hr	130.00
	IR READ THROUGH MORE RECENT POSTINGS BY DAVID GRINGAS REGARDING VANISHING TWINS AND "THEORIES;" .3 FORWARD SAME TO EXPERTS TO REVIEW; RESPONSE FROM EXPERTS REGARDING SAME .2	0.50 295.00/hr	147.50
	IR EMAIL FROM DAVID GINGRAS REGARDING RULE 49J; STAFF W GW REGARDING ALREADY PROVIDED DISCLOSURE STATEMENT PURSUANT TO RULE 49J	0.20 295.00/hr	59.00
	GRW EMAIL WITH WITNESS MARACHINI'S ATTORNEY .2 EMAIL TO GILLESPIE REGARDING HIM TALKING TO GINGRAS WHO MAY WANT TO INTERVIEW HIM .2	0.40 650.00/hr	260.00

		<u>Hrs/Rate</u>	<u>Amount</u>
4/20/2024	GRW CALL WITH WITNESS GILLESPIE WHO INDICATED HE HAD SENT LETTER TO GINGRAS	0.70 650.00/hr	455.00
4/21/2024	GRW EMAIL FROM GINGRAS WITH DRAFT EXPERT REPORT, REVIEW AND ANALYZE .2 EMAIL FROM GINGRAS WITH MORE LEGAL THREATS, REV AND ANALYZE .2 EMAIL TO EXPERTS WITH THEIR EXPERT DRAFT .1 EMAIL TO MR REGARDING RULE 26 ISSUE .2 EMAIL TO CLAYTON WIHT FULL UPDATE AND INFO ON ALL RECENTE EMAILS .2	0.90 650.00/hr	585.00
4/22/2024	GRW STAFF WITH IR REGARDING EVENTS OVER WEEKEND AND RESPONSES NEEDED	0.30 650.00/hr	195.00
	GRW EMAIL WITH EXPERTS REGARDING NEW INFORMATION	0.20 650.00/hr	130.00
	GRW EMAIL FROM GILLESPIE WITH CORRESPONDENCE FROM GINGRAS, RESPOND TO SAME	0.20 650.00/hr	130.00
	IR STAFF WITH GW REGARDING CASE STATUS AND UPDATES; DRAFT EMAIL TO DG REGARDING DISCLOSURE ETC AND EDITS REGARDING SAME	0.70 295.00/hr	206.50
	GRW REVISE RESPONSE LETTER TO DAVID GINGRAS	0.40 650.00/hr	260.00
	GRW EMAIL TO CLAYTON WITH EMAIL TO GINGRAS	0.10 650.00/hr	65.00
	GRW EMAIL FROM GINGRAS, FULL STAFF WITH DA AND IR, EMAIL TO [REDACTED] ATTORNEY REGARDING PERCEIVED THREATS	0.60 650.00/hr	390.00
	GRW EMAIL EXCHANGE WITH CLIENT	0.20 650.00/hr	130.00
	IR MORE WORK ON ECHARD PTS AND LEGAL RESEARCH REGARDING SAME; STAFF WITH GW	1.00 295.00/hr	295.00
	GRW CALL FROM MIKE M CONFIRMING TRIAL DATE AND HE WILL BE HERE TO TESTIFY	0.30 650.00/hr	195.00
	IR TC WITH MEDICAL EXPERTS REGARDING REPORT	0.40 295.00/hr	118.00
4/23/2024	GRW EMAIL WITH GREG AFTER RECEIVING INFORMATION ABOUT HIS INTERACTION WITH OPPOSING COUNSEL	0.40 650.00/hr	260.00

			<u>Hrs/Rate</u>	<u>Amount</u>
4/23/2024	GRW	EMAIL FROM GINGRAS REGARDING DISCLOSURE, RESPONSE WITH RECORDING	0.20 650.00/hr	130.00
	IR	STAFF WITH GW; REVIEW RECORDING FROM GG	0.40 295.00/hr	118.00
	IR	DRAFT LT TO MARRACCINI REGARDING TESTIMONY AND COURT INFORMATION; REVISIONS TO SAME	0.30 295.00/hr	88.50
	IR	REVIEW EXPERT REPORT	0.20 295.00/hr	59.00
	MB	RECEIVED, BATES STAMPED AND DRAFTED 4TH SUPPLEMENTAL DISCLOSURE STATEMENT	0.30 175.00/hr	52.50
	GRW	LETTER TO MIKE M, STAFF WITH IR REGARDING SAME	0.30 650.00/hr	195.00
	IR	STAFF DG NEW LETTER AND EMAIL WITH GW; EDITS TO DRAFT 4TH SUPP AND CHECKED FOR COMPLIANCE WITH RULE 49J	0.30 295.00/hr	88.50
	GRW	SUPPLEMENTAL DISCLOSURE STATEMENT .2 EMAIL TO DAVID GINGRAS .2	0.40 650.00/hr	260.00
	GRW	CONSULTATION WITH ██████ REGARDING ISSUES WITH DG, DEBRIEF WITH DA	0.80 650.00/hr	NO CHARGE
4/24/2024	GRW	EMAIL TO POTENTIAL WITNESS STEVE CARBONE REGARDING EMAILS .1, REVIEWED HIS EMAIL CHAIN WITH LO, STAFF REGARDING DISCLOSURE OF SAME AS IT CONFIRMS THAT EMAIL AND SONOGRAM WERE FROM LAURA .2	0.30 650.00/hr	195.00
	IR	STAFF WITH GW .2; DRAFT LETTER TO DG REGARDING RULE 26 .3	0.50 295.00/hr	147.50
	MB	RECEIVED, ORGANIZED, BATE STAMPED AND DRAFTED 5TH SUPPLEMENTAL DISCLOSURE STATEMENT	0.30 175.00/hr	52.50
	GRW	REVISIONS TO LETTER RESPONSE TO GINGRAS	0.30 650.00/hr	195.00
	IR	STAFF WITH GW REGARDING STRATEGY AND ADDITIONAL EDITS TO LETTER; APPROVAL OF 5TH SUPP AND ATTACHMENT COORDINATION	0.50 295.00/hr	147.50
4/25/2024	IR	EMAIL FROM DOCTORS REGARDING TESTIFYING; RESPONSE TO SAME	0.20 295.00/hr	59.00
	IR	EMAIL FROM DOCTORS REGARDING UPCOMING HEARING; RESPONSE TO SAME	0.20 295.00/hr	NO CHARGE

			<u>Hrs/Rate</u>	<u>Amount</u>
4/25/2024	GRW	EMAIL TO JOURNALIST DAVE NEAL WHO APPARANTLY RECEIVED RECORDS FROM LO FOR COPIES OF SAME	0.20 650.00/hr	130.00
	IR	STAFF WITH GW .2; EDITS TO LETTER AND CORRESPONDING DOCUMENTATION .2; STAFF STRATEGY REGARDING TRIAL .4	0.80 295.00/hr	236.00
	IR	STAFF CASE WITH DA	0.50 295.00/hr	147.50
4/26/2024	GRW	REVIEWED MORE DOCS REGARDING TAMPERED MEDICAL RECORDS, NOTE TO STORMY WHO SAYS THE RECORDS ARE HERS	0.30 650.00/hr	195.00
	GRW	RECEIVED AND SENT TO CLIENT MINUTE ENTRY RE REQUEST FOR JUDICIAL NOTICE GRANTED	0.20 650.00/hr	130.00
	GRW	EMAIL AND CONTACT WITH STORMY REGARDING RECORDS	0.20 650.00/hr	130.00
	IR	REVIEW OF RECORDS FROM PLANNED PARENTHOOD CONFIRMING NO JULY APPT .2 STAFF WITH GW .3 FINAL TOUCHES TO LETTER TO OPPOSING COUNSEL AND FINALIZATIONS OF AMENDED MOTION .2	0.70 295.00/hr	206.50
	MB	RECEIVED AND SENT TO CLIENT, OPPOSING COUNSEL AND JUDGE'S ASSISTANT AMENDED MOTION FOR RELIEF	0.20 175.00/hr	35.00
	GRW	RECEIVED AND SENT TO CLIENT MOTION FOR JOINT HEARING GRANTED	0.20 650.00/hr	130.00
	GRW	EMAIL FROM GINGRAS REGARDING HARVEY WEINSTEIN, NOTE TO CLIENT REGARDING SAME	0.20 650.00/hr	130.00
	MB	RECEIVED, ORGANIZED, BATE STAMPED AND DRAFTED 6TH SUPPLEMENTAL DISCLOSURE STATEMENT	0.40 175.00/hr	70.00
	GRW	STAFF WITH IR REGARDING DISCLOSURE AND LETTER TO GINGRAS REGARDING SAME .2	0.20 650.00/hr	130.00
4/29/2024	GRW	FIRST DRAFT OUTLINE REPLY	1.00 650.00/hr	650.00
	GRW	RECEIVED AND SENT TO CLIENT RESPONSE TO MOTION FOR RELIEF	0.20 650.00/hr	130.00
	IR	DRAFT REPLY TO MOTION FOR RELIEF JUDGMENT BASED ON FRAUD; STAFF WITH GW	2.00 295.00/hr	590.00
	IR	STAFF WITH GW; EDITS TO REPLY	0.40 295.00/hr	118.00

			<u>Hrs/Rate</u>	<u>Amount</u>
4/29/2024	IR	EDITS AND RESEARCH FOR DRAFT REPLY; SEND TO MR FOR REVIEW	0.30 295.00/hr	88.50
	GRW	CALL WITH RANDY POLLOCK REGARDING WITNESS PRESENCE	0.10 650.00/hr	65.00
	IR	REVIEW AND APPROVE REVISIONS FROM MR; STAFF WITH MR; ADDITIONAL EDITS AND SEND TO GW FOR REVIEW ETC	0.40 295.00/hr	118.00
	GRW	CALL WITH CLAYTON TO DISCUSS STATUS AND REGARDING NEW FILINGS	0.30 650.00/hr	195.00
4/30/2024	IR	STAFF WITH GW; ORCHESTRATION OF 7TH SUPP DISCLOSURE; EMAIL TO MB REGARDING SAME	0.20 295.00/hr	59.00
	IR	STAFF REPLY WITH GW; EDITS TO SAME PER DISCUSSION AND WITH INCLUSION AND COORDINATION OF EXHIBITS	0.50 295.00/hr	147.50
	GRW	COM WITH CLAYTON ABOUT FILING, REVIEW AND SIGNING VERIFICATION ON REPLY	0.10 650.00/hr	65.00
	MB	RECEIVED, ORGANIZED, REDACTED, BATE STAMPED AND DRAFTED 7TH SUPPLEMENTAL DISCLOSURE STATEMENT	1.00 175.00/hr	175.00
	IR	REVIEW SUPP DISCLOSURE 7 WITH NOTES ON SAME REVIEW DRAFT REPLY WITH EXHIBITS ATTACHMENT; EXHIBIT COORDINATION REGARDING SAME WITH MB	0.40 295.00/hr	118.00
	MB	FINALIZED AND SENT TO CLIENT AND OPPOSING COUNSEL 7TH SUPPLEMENTAL DISCLOSURE STATEMENT	0.20 175.00/hr	35.00
	MB	FINALIZED, FILED AND SENT TO CLIENT, OPPOSING COUNSEL AND JUDGE'S ASSISTANT REPLY TO AMENDED MOTION FOR RELIEF BASED ON FRAUD	0.40 175.00/hr	70.00
	GRW	REVISIONS TO REPLY	0.30 650.00/hr	195.00
	IR	REVIEW EMAIL FROM OPPOSING COUNSEL AND HIS DRAFT MX TO STRIKE; STAFF WITH GW AND MR REGARDING REPLY TO SAME	0.50 295.00/hr	147.50
	GRW	EMAIL AND MOTION TO STRIKE DRAFT FROM GINGRAS, STAFF WITH IR AND MR, DRAFT RESPONSE AND STAFF AGAIN	0.60 650.00/hr	390.00
5/1/2024	IR	REVIEW MINUTE ENTRY DENYING MOTION FOR LUNCH; FORWARD TO CLIENT WITH NOTE REGARDING SAME AND OTHER TWO FILINGS BY LAURA	0.20 295.00/hr	59.00
	GRW	EMAIL TO COURT REGARDING ANTICIPATED OBJECTION.1 STAFF WITH IR REGARDING TO-DOs .1	0.20 650.00/hr	130.00

			<u>Hrs/Rate</u>	<u>Amount</u>
5/1/2024	IR	STAFFING ECHARD WITH GW	0.20 295.00/hr	59.00
	IR	INITIAL DRAFTING OF RESPONSE OBJECTION TO MOTION TO STRIKE	0.50 295.00/hr	147.50
	IR	FINISH INITIAL DRAFT OF RESPONSE OBJ TO MOTION TO STRIKE	0.80 295.00/hr	236.00
	GRW	REVISIONS TO REPLY AND STAFF SAME WITH IR	0.50 650.00/hr	325.00
5/2/2024	GRW	MORE REVISIONS TO REPLY	0.30 650.00/hr	195.00
	IR	REVISIONS TO MOTION TO STRIKE REPLY PER GW	0.50 295.00/hr	147.50
	IR	FINALIZE AND FILE MOTION TO STRIKE WITH EXHIBIT - BILLED AT PARALEGAL RATE	0.30 175.00/hr	52.50
5/3/2024	IR	REVIEW RECORDS AND FILINGS; DRAFT INITIAL RESPONSE TO MOTION IN LIMINE	1.20 295.00/hr	354.00
	IR	REVIEW FILINGS FROM OPPOSING PARTY REGARDING REPLY TO MOTION TO STRIKE AND AFFIDAVIT, STAFF BRIEFLY WITH GW; FORWARD TO CLIENT WITH NOTE REGARDING SAME	0.30 295.00/hr	88.50
5/5/2024	GRW	EMAIL WITH EXPERT REGARDING COMP FORENSICS .2 REGARDING OVARY LETTER, STAFF WITH IR REGARDING SAME, CALL TO EXPERT REGARDING TIMING AND STATUS .3	0.50 650.00/hr	325.00
	GRW	REVISIONS TO MOTION IN LIMINE DRAFT	1.20 650.00/hr	780.00
	GRW	RESEARCH REGARDING RESPONSE TO MOTION IN LIMINE AND REVISIONS	0.50 650.00/hr	325.00
5/6/2024	GRW	REVISIONS TO RESPONSE	0.60 650.00/hr	390.00
	IR	REVIEW AND TAKE NOTES ON MARRACCINI FILES REGARDING; TWIN PREGNANCY, FEIGNED MISCARRIAGE, FEIGNED APPOINTMENTS WITH DOCTORS, ETC	3.00 295.00/hr	885.00
	IR	TC WITH MM REGARDING GAPS IN TEXT MESSAGES AND NEED FOR CONTEXT	0.20 295.00/hr	59.00
	IR	TC WITH JON BERRYHILL FORENSIC EXPERT	0.20 295.00/hr	59.00

			<u>Hrs/Rate</u>	<u>Amount</u>
5/6/2024	IR	REVIEW AND EDITS TO DRAFT RESPONSE TO MOTION IN LIMINE	0.40 295.00/hr	118.00
	IR	2ND DRAFT RESPONSE EMAIL TO DG; FORWARD RESPONSE MIL DRAFT TO MR	0.20 295.00/hr	59.00
	GRW	CALL WITH RANDI POLLOCK WHO RELAYED UNPLEASANT CONVERSATION WITH GINGRAS	0.20 650.00/hr	130.00
	GRW	EMAIL EXCHANGE REGARDING EXPERT REPORT	0.20 650.00/hr	130.00
	GRW	EMAIL WITH RANDY POLLOCK REGARDING WITNESS MM	0.30 650.00/hr	195.00
5/7/2024	GRW	STAFF REGARDING EMAIL FROM POLLOCK .1 EMAIL ABOUT COSTUME PICTURE .1 REDLINES FROM MR REVIEWED.1	0.30 650.00/hr	195.00
	GRW	REVISE LETTER AND SETTLEMENT PROPOSAL TO GINGRAS	0.20 650.00/hr	130.00
	GRW	EMAIL WITH RANDY REGARDING STATUS AND POSTING OF MIKE'S TRANSCRIPT	0.20 650.00/hr	130.00
	IR	STAFF DISCLOSURE WITH SS	0.30 295.00/hr	88.50
	SS	STAFF WITH GW AND IR; REVIEW AND ORGANIZE DOCUMENTS FOR DISCLOSURE; .2 PREPARE 8TH SUPPLEMENTAL DISCLOSURE STATEMENT .2	0.40 175.00/hr	70.00
	GRW	REVISIONS TO RESPONSE TO MIL	0.30 650.00/hr	195.00
	SS	PREPARE AND HAVE ISSUED SUBPOENA DUCES TECUM FOR MARRACCINI.	0.20 175.00/hr	35.00
	GRW	CALL TO CLIENT TO DISCUSS RESPONSE .1 CALL WITH WITNESS MARACINI .2	0.30 650.00/hr	195.00
	SS	FINALIZE AND DISPATCH SUPPLEMENTAL DISCLOSURE STATEMENT.	0.20 175.00/hr	35.00
	IR	DRAFT AND SEND VERIFICATION SHEET TO CLIENT .1 FINALIZATION, FINAL EDITS, PREPARATION OF EXHIBITS, AND FILING OF RESPONSE TO MOTION LIMINE - CHARGED AT LC HOURS .4	0.50 175.00/hr	87.50
	GRW	EMAIL TO CLAYTON WITH STATUS	0.20 650.00/hr	130.00

		<u>Hrs/Rate</u>	<u>Amount</u>
5/8/2024	GRW EMAIL FROM GINGRAS, STAFF AND DRAFT RESPONSE	0.50 650.00/hr	325.00
	IR SAT IN ON CALL WITH DG , DG BELIEVES TEXTS WITH MM ARE LIKELY REAL, LAURA IS CONSIDERING HER OWN EXPERT TO REVIEW MM LAPTOP; DG IS TRYING TO GET LAURA TO AGREE TO A SETTLEMENT; POSSIBLY AN UNDERLYING MENTAL HEALTH CONDITION. NOTES ON SAME. STAFF WITH GW AND DA.	0.50 295.00/hr	NO CHARGE
	GRW CALL WITH GINGRAS AND STAFF WITH IR AND DA	0.60 650.00/hr	390.00
	GRW EMAIL FROM DAVID, EMIAL TO DAVID, CALL WITH MIKE, EMAIL TO MIKE	0.70 650.00/hr	455.00
	GRW CALL WITH WITNESS MM REGARDING ANOTHER POSTING FROM GINGRAS UPSETTING HIM	0.20 650.00/hr	130.00
5/9/2024	GRW AM CALLS REGARDING NEW TWEET FROM GINGRAS THAT UPSET WITNESS MM	0.40 650.00/hr	260.00
	GRW EMAIL FROM DAVID, STAFF WITH TEAM, EMAIL TO DAVID REGARDING POSTING	0.50 650.00/hr	325.00
	GRW REVIEWERD MORE DISCLOSURE AND EMIAL FROM GINGRAS REGARDING DISCLOSURE AND CONTINUANCE; NOTE TO GINGRAS	1.20 650.00/hr	780.00
5/10/2024	GRW 2 EMAILS FROM GINGRAS, ONE OF WHICH WEIRDLY INCLUDES MY NAME ON TEXTS AND NO CONTEXT, FULL STAFFING WITH DA REGARDING DEVELOPMENTS INCLUDING THESE EMIALS	0.50 650.00/hr	325.00
5/13/2024	GRW RECEIVED AND SENT TO CLIENT MOTION FOR JUDGMENT	0.20 650.00/hr	130.00
	GRW CALL WITH WITNESS GG	0.20 650.00/hr	130.00
	GRW STAFF WITH MR REGARDING RESPONSE TO MOTION	0.40 650.00/hr	260.00
5/14/2024	GRW RECEIVED AND SENT TO CLIENT NOTICE OF ERRATA AND REPLY TO MOTION IN LIMINE	0.20 650.00/hr	130.00
	GRW REVIEWED TWO MOTIONS AND STAFF SAME WITH IR	0.40 650.00/hr	260.00
	IR CATCH UP AND STAFF ECHARD WITH GW	0.50 295.00/hr	NO CHARGE

		<u>Hrs/Rate</u>	<u>Amount</u>
5/14/2024	MB EMAILED CLIENT AFFIDAVIT OF FINANCIAL INFORMATION TO FILL OUT	0.20 175.00/hr	35.00
	IR CONSULT MR NOTES; DRAFT RESPONSE OBJECTION TO MOTION FOR JUDGMENT ON THE PLEADINGS; LEGAL RESEARCH REGARDING SAME	1.50 295.00/hr	442.50
5/15/2024	GRW REVISIONS TO RESPONSE TO MOTION TO DISMISS	0.60 650.00/hr	390.00
	IR CLEAN UP AND EDITS TO MR AND GW REVISIONS ON DRAFT MX FOR JUDGMENT ON THE PLEADINGS; STAFF WITH GW REGARDING SAME	0.60 295.00/hr	177.00
	MB EMAILED CLIENT REGARDING AFFIDAVIT OF FINANCIAL INFORMATION	0.10 175.00/hr	17.50
	GRW DRAFTED NOTICE OF FILING AFFIDAVIT OF FINANCIAL INFORMATION	0.20 650.00/hr	130.00
	MB TELEPHONE CALL WITH CLIENT REGARDING AFFIDAVIT OF FINANCIAL INFORMATION X2	0.20 175.00/hr	35.00
	GRW REVISIONS TO RESPONSE	0.20 650.00/hr	130.00
	GRW CALL WITH CE REGARDING AFFIDAVIT OF FINANCIAL INFORMATION AND STATUS OF MOTION, STAFF WITH MR REGARDING TO-DOS REGARDING AFI, ETC.	0.20 650.00/hr	130.00
	MB FINALIZED, FILED AND SENT TO CLIENT, OPPOSING COUNSEL AND JUDGE'S ASSISTANT RESPONSE/OBJECTION TO MOTION FOR JUDGMENT AND RENEWED MOTION TO DISMISS AND NOTICE OF FILING AFI	0.40 175.00/hr	70.00
	GRW STAFF WITH DA/IR REGARDING TO-DOS NOW THAT RESPONSE IS FILED	0.20 650.00/hr	130.00
5/16/2024	IR NOTES ON LAURA OWENS INCONSISTENT STATEMENTS	0.50 295.00/hr	147.50
5/17/2024	GRW REVIEWED MINUTE ENTRY, STAFF WITH IR	0.20 650.00/hr	130.00
	GRW RECEIVED AND SENT TO CLIENT MINUTE ENTRY RE MOTION TO WITHDRAW SANCTIONS	0.20 650.00/hr	130.00
	GRW STAFF WITH IR REGARDING OUTLINE FOR PTS	0.30 650.00/hr	195.00

		<u>Hrs/Rate</u>	<u>Amount</u>
5/17/2024	IR STAFF WITH GW; WORK ON DRAFT PRETRIAL STATEMENT	2.00 295.00/hr	590.00
	GRW STAFF WITH IR, CALL WITH CLAYTON REGARDING NEW DEVELOPMENTS AND ISSUE	0.30 650.00/hr	195.00
	GRW EMAIL FROM GINGRAS, STAFF WITH OFFICE, EMAIL ██████████ REGARDING URGENCY	0.40 650.00/hr	260.00
	IR EMAIL FROM DG; FORWARD IMMEDIATELY TO GW	0.10 295.00/hr	29.50
	GRW CALL REGARDING GRINGAS SITUATION AND DEBRIEF WITH IR/DA	0.60 650.00/hr	390.00
	IR STAFF DG EMAIL AND ETHICAL COMPLIANCE DUTIES WITH GW AND WRITE EMAIL TO DG REGARDING THE SAME IN ACCORDANCE WITH RULE 4.4B	0.80 295.00/hr	236.00
	GRW EMAIL FROM CORY AND DAVID, STAFF WITH IR	0.30 650.00/hr	195.00
5/20/2024	GRW STAFF WITH IR REGARDING PTS	0.10 650.00/hr	65.00
	IR STAFF ECHARD UPDATES AND PTS QUESTIONS WITH GW	0.20 295.00/hr	59.00
5/21/2024	LC DRAFT MOTION FOR VIRTUAL APPEARANCE OF DR DEANS, SAVE TO FILE FOR IR REVIEW	0.30 175.00/hr	52.50
	IR REVIEW MX TO APPEAR TELEPHONICALLY AND STAFF WITH GW .1 EMAIL TO DRS REGARDING TRIAL PREP COORDINATION .1	0.20 295.00/hr	59.00
	GRW EMAIL TO GINGRAS REGARDING MOTION	0.10 650.00/hr	65.00

		<u>Hrs/Rate</u>	<u>Amount</u>
5/21/2024	GRW EMAIL WITH GINGRAS REGARDING TESTIMONY BY VIDEO	0.10 650.00/hr	65.00
	MB FINALIZED, FILED AND SENT TO CLIENT, OPPOSING COUNSEL AND JUDGE'S ASSISTANT STIPULATED MOTION FOR VIRTUAL APPEARANCE OF WITNESS	0.20 175.00/hr	35.00
	IR CONTINUED WORK ON DRAFT PTS AND STAFF WITH GW	0.80 295.00/hr	236.00
	GRW EMAIL FROM GINGRAS WHERE HE ATTEMPTS TO BULLY CORY KEITH INTO NOT FILING A NOTICE OF CANDOR, STAFF WITH IR AND TEAM, EMAIL TO CLAYTON REGARDING SAME	0.40 650.00/hr	260.00
	GRW EMAIL WITH CLAYTON REGARDING STATUS	0.10 650.00/hr	65.00
5/22/2024	GRW REVIEWED ORDER, STAFF WITH IR, EMAIL TO CLIENT	0.40 650.00/hr	260.00
	GRW CALL WITH WITNESS MARRACINI REGARDING UPCOMING TRIAL	0.30 650.00/hr	195.00
	GRW CALL WITH CLIENT TO DISCUSS NEW DEVELOPMENTS AND RECENT POSTS FROM GINGRAS	0.50 650.00/hr	325.00
	IR READ ME FROM MATA REGARDING RULINGS; STAFF WITH MR AND GW; EMAIL CLIENT WITH THOUGHTS REGARDING RULING AND IMPACT ON LITIGATION	0.20 295.00/hr	59.00
5/23/2024	GRW REVIEW AND ANALYSIS OF REPLY FROM GINGRAS REGARDING RULE 26 MOTION	0.30 650.00/hr	195.00
	GRW RECEIVED AND SENT TO CLIENT REPLY TO MOTION FOR JUDGMENT	0.20 650.00/hr	130.00
	IR FINISH FIRST DRAFT OF PRETRIAL STATEMENT AND COMPREHENSIVE REVIEW OF DISCLOSURE	1.50 295.00/hr	442.50
	GRW FIRST ROUND OF REVISIONS TO PTS	1.00 650.00/hr	650.00
	IR STAFF PTS WITH GW	0.10 295.00/hr	29.50
5/24/2024	GRW MORE PTS CLARIFICATIONS AND STARTED OUTLINE FOR TRIAL PREP	0.40 650.00/hr	260.00
	IR STAFF WITH GW; EDITS TO PTS	0.30 295.00/hr	88.50

		<u>Hrs/Rate</u>	<u>Amount</u>
5/24/2024	IR EMAILS WITH EXPERTS TO COORDINATE CALL TO PREP; SET CALL FOR LATER TODAY WITH GW AND I	0.20 295.00/hr	59.00
	GRW MORE PTS REVISIONS	1.10 650.00/hr	715.00
	GRW PREP WITH EXPERT CONF CALL	0.50 650.00/hr	325.00
	IR TC WITH MEDICAL EXPERTS AND GW REGARDING ANTICIPATED TESTIMONY AND PROCEDURAL ASPECTS OF TRIAL	0.50 295.00/hr	147.50
5/25/2024	GRW REVISIONS TO 20 PAGE DRAFT PTS	1.50 650.00/hr	975.00
5/28/2024	GRW STAFF WITH IR AND MB REGARDING TO-DOs FOR TRIAL, EMAIL TO GINGRAS REGARDING MEETING	0.20 650.00/hr	130.00
	GRW MORE STAFFING WITH IR REGARDING IN PERSON REQUIREMENT ISSUES	0.20 650.00/hr	130.00
	IR EMAIL DG ZOOM LINK FOR CALL	0.10 295.00/hr	NO CHARGE
	GRW CALL WITH CE REGARDING FILING FROM GINGRAS EMAIL TO CE REGARDING FILING FROM GINGRAS AND PREP FOR TODAY'S CALL WITH DG	0.40 650.00/hr	260.00
	IR EDITS AND UPDATED INFORMATION TO DRAFT PTS	1.30 295.00/hr	383.50
	IR TC WITH GRINGAS AND CLIENT AND STAFF WITH GW	0.50 295.00/hr	147.50
	GRW CALL WITH GINGRAS AND LAURA	0.60 650.00/hr	390.00
	GRW CALL TO CLAYTON TO DEBRIEF	0.10 650.00/hr	65.00
	GRW DEBRIEF WITH CLAYTON FURTHER AND EMAIL TO GINGRAS REGARDING CALL TOMORROW	0.30 650.00/hr	195.00
	IR FINISH UP EDITS TO PTS; BRIEF CALL WITH CLIENT AND GW	0.20 295.00/hr	59.00

			<u>Hrs/Rate</u>	<u>Amount</u>
5/28/2024	IR	EDITS TO DRAFT PTS REGARDING TRANSCRIPT AND UPDATING INFORMATION PER DISCUSSION WITH GW	0.50 295.00/hr	147.50
	IR	CALL WITH CLIENT REGARDING TC TOMORROW WITH DG; SET UP ZOOM LINK AND CIRCULATE SAME	0.20 295.00/hr	59.00
	GRW	EMAIL FROM DAVID, STAFF WITH DA REGARDING SAME	0.20 650.00/hr	130.00
	MB	PREPARED TRIAL EXHIBITS FOR REVIEW	2.00 175.00/hr	350.00
	GRW	MORE REVIEWS TO PTS	0.30 650.00/hr	195.00
5/29/2024	GRW	REVIEWED RULING, STAFF WITH IR .2 EMAIL RULING AND STATUS NOTE TO CLAYTON .1	0.30 650.00/hr	195.00
	IR	ANOTHER ROUND OF EDITS TO PTS	0.70 295.00/hr	206.50
	IR	STAFF PTS WITH GW; FINAL EDITS; DISPATCH TO MR FOR REVIEW	0.20 295.00/hr	59.00
	GRW	CALL WITH CLAYTON REGARDING STATUS AND PREP FOR MEETING	0.20 650.00/hr	130.00
	IR	VIDEO CALL WITH CLIENT, GINGRAS AND GW; TC WITH CLIENT POST VIDEO CALL	0.60 295.00/hr	177.00
	GRW	INFORMAL SETT CONF, DEBRIEF WITH CLIENT	0.60 650.00/hr	390.00
5/30/2024	GRW	COM WITH CLAYTON REGARDING NEW DEVELOPMENTS AND THE POSTING FROM LAURA AND GINGRAS IMMEDIATELY AFTER OUR SETT CONFERENCE WHERE GINGRAS SORT OF APOLOGIZED FOR HOW THINGS WERE HANDLED EARLY IN THE CASE BUT THEN PROMPTLY POSTED THIS SIMILAR TO WHAT HAPPENED WITH THE POSTING OF THE PICTURE OF MARRACCINI	0.20 650.00/hr	130.00
	GRW	EMAIL FROM COURT, STAFF WITH IR REGARDING MEDIA ISSUE, NOTE TO COURT AND COM WITH CL	0.30 650.00/hr	195.00
	MR	EXTENSIVE REVIEW AND EDITS OF PTS FOR APPELLATE PURPOSES IN LIGHT OF COMMENTS FROM GINGRAS PROMISING APPEAL	3.00 425.00/hr	1,275.00
5/31/2024	IR	EMAIL FROM DG; DRAFT RESPONSE TO SAME	0.10 295.00/hr	29.50

			<u>Hrs/Rate</u>	<u>Amount</u>
5/31/2024	GRW	EMAIL EXCHANGE WITH GINGRAS REGARDING PROVIDERS AND CORY COMMUNICATION REGARDING COURTS FEBRUARY ORDER, STAFF SAME WITH IR	0.20 650.00/hr	130.00
	GRW	2 EMAILS FROM GINGRAS REGARDING PRETRIAL ISSUES, RESPONSE, STAFF WITH IR REGARDING ME AND DISCLOSURE	0.20 650.00/hr	130.00
	IR	EDITS TO UPDATED PTS DRAFT IN LIGHT OF MR/GW COMMENT	0.30 295.00/hr	88.50
	LC	REVIEW PREVIOUS FILE DOOCUENTS/PLEADINGS TO UPDATE REQUEST FOR FINDINGS OF FACT/LAW AND ATTACHED ORDER, SAVE TO FILE FOR IR REVIEW	1.10 175.00/hr	192.50
	GRW	EMAIL WITH GINGRAS REGARDING FACTS, NOTE TO STAFF REGARDING TO DOS	0.20 650.00/hr	130.00
	IR	REVISIONS TO PTS AND SEND TO CLIENT WITH NOTE REGARDING REVIEW	0.30 295.00/hr	88.50
	LC	REVIEW/EDIT UPDATED REQUEST FOR FINDINGS OF FACT AND CONCLUSIONS OF LAW	0.60 175.00/hr	105.00
	IR	REVIEW AND EDITS TO REQUEST FOR FINDINGS OF FACT AND CONCLUSIONS OF LAW	0.40 295.00/hr	118.00
	GRW	EMAIL ECHANGE WITH GINGRAS REGARDING PTS	0.20 650.00/hr	130.00
	IR	EMAIL FROM CLIENT APPROVING DRAFT PTS; RESPONSE TO SAME BRIEF	0.10 295.00/hr	29.50
	IR	STAFF EMAIL FROM DG WITH GW VIA PHONE CALL	0.20 295.00/hr	59.00
	GRW	EMAIL FROM GINGRAS.1 REVIEWED GINRAS TWEETS AND THE VIDEOS HE POSTED ONLINE, STAFFED SAME WITH TEAM .7	0.80 650.00/hr	520.00
6/1/2024	GRW	REVISIONS TO PTS IN LIGHT OF DEVELOPING ISSUES AND LETTER FROM GINGRAS	0.60 650.00/hr	390.00
	GRW	STARTED TRIAL PREP QUESTION OUTLINING	1.00 650.00/hr	650.00
6/3/2024	IR	STAFF PTS, EXHIBITS, AND TRIAL PREP WITH GW	0.40 295.00/hr	118.00
	GRW	EMAIL WITH WITNESS MARACINI REGARDING COORDINATION .1 MORE DRAFTING OFQUESTION OUTLINE DRAFT .7	0.80 650.00/hr	520.00

		<u>Hrs/Rate</u>	<u>Amount</u>
6/3/2024	IR EXHIBIT REVIEW AND NOTE TAKING REGARDING SAME; NOTE EXHIBITS TO CUT	1.00 295.00/hr	295.00
	GRW FINAL EDITS ON PTS	0.50 650.00/hr	325.00
	IR EXHIBIT AND PTS REVIEW WITH GW AND MB	0.50 295.00/hr	147.50
	LC DRAFT NOTICE OF ASSOCIATION FOR DA ON JUNE 10 HEARING	0.30 175.00/hr	52.50
	IR REVIEW AND AID IN EXHIBIT SELECTION; SELECT EXHIBITS FROM 2500 MM FILES	0.30 295.00/hr	88.50
	GRW WITNESS PREP WITH MARACINI	0.60 650.00/hr	390.00
	IR ROUND 3 REVIEW AND EDITS TO EXHIBIT LIST AND COORDINATE SAME WITH MB	0.50 295.00/hr	147.50
	MB PREPARED AND FINALIZED TRIAL EXHIBITS	5.00 175.00/hr	875.00
	GRW RECEIVED AND SENT TO CLIENT PETITIONERS PRETRIAL STATEMENT AND REQUEST FOR FINDINGS	0.20 650.00/hr	130.00
	MB FINALIZED, FILED AND SENT TO CLIENT, JUDGE'S ASSISTANT AND OPPOSING COUNSEL RESPONDENT'S PRETRIAL STATEMENT AND EXHIBITS	0.30 175.00/hr	52.50
	DA BEGIN OUTLINE FOR TRIAL, INCLUDING BEGINNING REVIEW OF CLIENT'S EXHIBITS.	1.20 425.00/hr	510.00
6/4/2024	GRW REVIEWED OWENS PTS AND STAFF WITH TEAM	0.60 650.00/hr	390.00
	MB RECEIVED, DOWNLOADED AND SENT TO CLIENT LAURA'S EXHIBITS	0.20 175.00/hr	35.00
	GRW REVIEWED CORY KEITH'S NOTICE PER 3.3 AND RESEARCH REGARDING SAME	0.30 650.00/hr	195.00
	MB PREPARED TRIAL NOTEBOOK	1.00 175.00/hr	175.00
	IR STAFF DG THREATS WITH GW; REVIEW DG PTS FOR FALSE AND INCONSISTENT STATEMENTS	0.30 295.00/hr	88.50
	GRW CALL WITH COURT SECURITY AND STAFF REGARDING OPTIONS IN LIGHT OF GINGRAS LETTER, EMAIL TO ALL REGARDING ARREST COMMENT, RESEARCH REGARDING	0.80 650.00/hr	520.00

			<u>Hrs/Rate</u>	<u>Amount</u>
		STATUTE REGARDING WITNESS INTIMIDATION AND REVISION TO LETTER		
6/4/2024	GRW	EMIAL WITH COURT AND REGARDING MARACINI	0.40 650.00/hr	260.00
	GRW	COORDINATE INTERVIEW AND PREP WITH WITNESS GILLESPIE	0.10 650.00/hr	65.00
	DA	CONTINUE REVIEWING EXHIBITS, PRIOR CORRESPONDENCE BETWEEN THE PARTIES AND COUNSEL, PRETRIAL STATEMENTS, AND BEGIN REVIEWING DEPOSITION OF OPPOSING PARTY IN PREPARATION FOR TRIAL. CONTINUE DRAFTING TRIAL OUTLINE.	2.20 425.00/hr	935.00
6/5/2024	GRW	EXHIBIT REVIEW AND PREP FOR TRIAL	0.70 650.00/hr	455.00
	IR	STAFF AND PREP QUESTIONS FOR ECHARD AND GILLESPIE WITH GW AS WELL AS EXHIBIT PREP	1.50 295.00/hr	442.50
	GRW	WITNESS PREP WITH GILLESPIE	0.50 650.00/hr	325.00
	IR	STAFF QUESTIONS AND EXHIBIT ISSUES WITH DA AND GW	0.20 295.00/hr	59.00
	DA	CONTINUE WORKING ON TRIAL PREP OUTLINE INCLUDING REVIEWING EXHIBITS, SPECIFICALLY OPPOSING PARTY'S ENTIRE DEPOSITION TRANSCRIPT. BEGIN DRAFTING SOME CROSS AND DIRECT EXAMINATION QUESTIONS	2.30 425.00/hr	977.50
6/6/2024	GRW	TRIAL PREP WITH CE AND IR	0.60 650.00/hr	390.00
	IR	WITNESS PREP WITH CLIENT AND GW	0.60 295.00/hr	177.00
	MB	TELEPHONE CALL WITH JUDGE'S ASSISTANT TO GET LINK FOR WITNESS TESTIMONY	0.10 175.00/hr	17.50
	GRW	REVIEWED TWO EMAILS FROM COURT REGARDING LOGISTICS, STAFF WITH IR REGARDING SAME REGARDING COORDINATING WITH EXPERT TO VIDEO APPEAR	0.20 650.00/hr	130.00
	IR	STAFF LO EXHIBITS WITH DA 2X EMAIL TO DR. DEANS WITH LINK TO HEARING AND REQUEST FOR CALL TO PREP	0.30 295.00/hr	88.50
	MB	FINALIZED, FILED AND SENT TO CLIENT, JUDGE'S ASSISTANT AND OPPOSING COUNSEL NOTICE OF ASSOCIATION	0.20 175.00/hr	35.00

		<u>Hrs/Rate</u>	<u>Amount</u>
6/6/2024	IR GO THROUGH DRAFT QUESTIONS FOR CLAYTON AND CLEAN UP AND COORDINATE WITH EXHIBITS	0.40 295.00/hr	118.00
	IR EMAILS TO COORDINATE TIME TO CALL DR. DEANS EXPERT	0.20 295.00/hr	59.00
	GRW WITNESS PREP WITH DR. DEANS	0.70 650.00/hr	455.00
	DA PHONE CALL WITH DR. DEANS REGARDING UPCOMING TRIAL. STAFFING WITH ATTORNEY G.WOODNICK REGARDING SAME.	0.70 425.00/hr	297.50
	IR TC WITH DR DEANS AND STAFF WITH DA AND GW FOR WITNESS PREP; STAFF CROSS FOR DR MEDCHILL WITH GW	0.70 295.00/hr	206.50
	GRW EXPANDED WITNESS OUTLINE FOR CROSS EXAMINAGION	0.70 650.00/hr	455.00
	DA CONTINUE REVIEWING ALL EXHIBITS AND PREPARING TRIAL OUTLINE.	2.40 425.00/hr	1,020.00
6/7/2024	IR CLEAN UP QUESTIONS FOR TRIAL AND COORDINATE WITH EXHIBIT LIST	0.50 295.00/hr	147.50
	IR PREP WITH DA AND GW FOR TRIAL	0.50 295.00/hr	147.50
	GRW TRIAL AND EXHIBIT ORCHESTRATION FOR MONDAY	2.80 650.00/hr	1,820.00
	GRW REVIEWED SUP FILING FROM GINGRAS WHICH SEEMS TO MALIGNANTLY CLAIM CLAYTON., MM OR I FAKED 2500 RECORDS AS BASIS FOR OBJECTION, STAFF SAME WITH DA	0.30 650.00/hr	195.00
	IR STAFF AND RUN THROUGH TRIAL QUESTIONS AND PREP WITH DA AND GW	2.50 295.00/hr	737.50
	DA CONTINUE REVIEWING ALL EXHIBITS, PLEADINGS, AND PRIOR DISCLOSURES FOR TRIAL. CONTINUE PREPARING TRIAL OUTLINE AND QUESTIONS (CROSS AND DIRECT).	4.50 425.00/hr	1,912.50
6/8/2024	IR STAFF QUESTIONS AND TRIAL PREP WITH GW AND DA	4.50 295.00/hr	1,327.50
	GRW TRAIL PREP FROM 10-4PM FOR FULL REVIEW OF ALL EVIDENCE	6.00 650.00/hr	3,900.00
	DA CONTINUE PREPARING FOR TRIAL WITH ATTORNEY G.WOODNICK, INCLUDING PREPARING DIRECT AND CROSS EXAMINATION QUESTIONS FOR WITNESSES.	4.00 425.00/hr	1,700.00

		<u>Hrs/Rate</u>	<u>Amount</u>
6/9/2024	GRW FINAL TRIAL PREP WITH CE AND REGARDING EXHIBITS	1.90 650.00/hr	1,235.00
	DA CONTINUE FINE TUNING TRIAL OUTLINE AND QUESTIONS FOR TRIAL.	1.60 425.00/hr	680.00
6/10/2024	GRW FINAL TRIAL PREP, TRIAL AND DEBRIEF WITH TEAM	5.00 650.00/hr	3,250.00
	IR TRAVEL TO AND FROM COURT; COURT HEARING REGARDING PETITION TO ESTABLISH, ATTORNEYS FEES AND SANCTIONS	5.00 295.00/hr	1,475.00
	DA COURT APPEARANCE WITH ATTORNEY, G. WOODNICK AND CLIENT FOR FINAL TRIAL. FINAL PREPARATION FOR HEARING. TRAVEL TO AND FROM COURT HOUSE. ATTEND HEARING. FINALIZE CASE NOTES AND UPDATE FILE.	5.00 425.00/hr	2,125.00
6/13/2024	GRW REVIEWED MINUTE ENTRY, EMAIL TO CLIENT	0.20 650.00/hr	130.00
	IR ECHARD POST TRIAL RESEARCH PER GW INSTRUCTION	1.50 295.00/hr	442.50
6/14/2024	IR CLEAN UP DRAFT LETTER REGARDING ECHARD	0.50 295.00/hr	147.50
	IR EDITS TO DRAFT LETTER REGARDING ECHARD CASE PER GW REQUEST	0.20 295.00/hr	59.00
6/17/2024	GRW EMIAL FROM GINGRAS, STAFF WITH TEAM REGARDING ALLEGATIONS AGAINST COURT FOR IMPROPRIETY	0.50 650.00/hr	325.00
	GRW CALL WITH CLAYTON REGARDING IMPROPRIETY ALLEGATION FROM GINGRAS, EMIAL TO CLAYTON REGARDING SAME	0.30 650.00/hr	195.00
6/18/2024	GRW REVIEWED 19 PAGE RULING FROM COURT .3 STAFF RULING WITH DA .2 REVIEWED MULTIPLE BIZZARE TWEETS FROM GINGRAS INCLUDING HIM ASKING FOR VENMO DONATIONS AND COMMENTS ABOUT IT BEING ONLY "HALF TIME" .1 CALL WITH CLAYTON TO DISCUSS RULING .3	0.90 650.00/hr	585.00
	MB PREPPED OUTLINE DRAFT OF CHINA DOLL FOR ATTORNEY	0.50 175.00/hr	87.50
6/25/2024	GRW FIRST DRAFT CDA 1.0	1.0 650.00/hr	650.00
	For professional services rendered	356.6	\$148,816.00

Additional Charges :

	<u>Amount</u>
8/2/2023 CONSULTATION FEE – RM WARNER, PLC	385.00
8/21/2023 CONSULTATION FEE – SLOMA LAW GROUP	350.00
8/23/2023 FILING FEE – RESPONSE TO PETITION TO ESTABLISH PATERNITY	204.00
12/11/2023 Credit Card Fee 3% of \$4,000	120.00
12/12/2023 FILING FEE - NOTICE OF APPEARANCE	6.70
FILING FEE - MOTION TO AMEND RESPONSE TO PETITION	6.70
FILING FEE - EXPEDITED MOTION TO EXTEND THE INACTIVE CALENDAR	6.70
FILING FEE - NOTICE OF FILING NON-PATERNITY	6.70
1/3/2024 FILING FEE - RESPONSE TO MOTION TO DISMISS	6.70
FILING FEE - REPLY TO RESPONSE TO MOTION TO EXTEND	6.70
FILING FEE - MOTION FOR SANCTIONS	6.70
1/4/2024 FILING FEE - RESPONSE TO MOTION TO QUASH	6.70
1/17/2024 FILING FEE NOTICE.	6.50
1/19/2024 FILING FEE - RESPONSE/OBJECTION TO MOTION FOR PROTECTIVE ORDER	6.70
1/25/2024 FILING FEE - REPLY TO RESPONSE TO MOTION FOR SANCTIONS	6.70
1/26/2024 FILING FEE - AMENDED RESPONSE TO PETITION	6.70
2/6/2024 FILING FEE - EXPEDITED MOTION TO CONTINUE AND MOTION FOR ADDITIONAL TIME	6.70
2/12/2024 FILING FEE - EXPEDITED MOTION TO SET STATUS CONFERENCE	6.70
3/14/2024 TRANSCRIPT AND VIDEOGRAPHER COST FOR DEPOSITION OF LAURA OWENS	1,909.65
3/11/2024 FILING FEE - MOTION TO COMPEL	6.70
3/14/2024 Cancellation Fee for Deposition on 1/17/24 from Maricopa Reporting; Invoice 4620	500.00
3/18/2024 SUBPOENA FOR SARAH OWENS	40.00
3/25/2024 FILING FEE - MOTION FOR JOINT HEARING FC202302771	6.70
FILING FEE - MOTION FOR JOINT HEARING FC2023052114	6.70
FILING FEE - MOTION FOR RELIEF FROM JUDGEMENT	6.70
4/1/2024 TRANSCRIPT COST FOR DEPOSITION OF CLAYTON ECHARD TAKEN ON 2/2/24	532.71

Clayton Echard

Page 44

4/3/2024 FILING FEE - MOTION TO WITHDRAW MOTION FOR SANCTIONS

6.70

4/10/2024 FILING FEE - RESPONSE TO MOTION FOR LUNCH

6.70

	<u>Amount</u>
4/26/2024 FILING FEE - AMENDED MOTION FOR RELIEF	6.70
4/30/2024 FILING FEE - REPLY TO AMENDED MOTION FOR RELIEF BASED ON FRAUD	6.70
5/7/2024 FEE FOR ISSUING SUBPOENA DUCES TECUM FOR MICHAEL MARRACCINI TO TESTIFY AT TRIAL	40.00
5/15/2024 FILING FEE - RESPONSE/OBJECTION TO MOTION FOR JUDGMENT AND RENEWED MOTION TO DISMISS	6.70
FILING FEE - NOTICE OF FILING AFI	6.70
5/21/2024 FILING FEE - STIPULATED MOTION FOR VIRTUAL APPEARANCE OF WITNESS	6.70
6/3/2024 FILING FEE - RESPONDENT'S PRETRIAL STATEMENT	6.70
6/6/2024 FILING FEE - NOTICE OF ASSOCIATION	6.70
Total additional charges	<u>\$4,776.76</u>